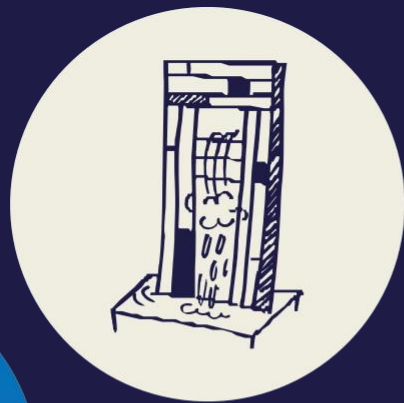


HAMILTON CITY COUNCIL SUBMISSION

Draft Waikato Regional Land Transport Plan 2024 – 2054

Waikato Regional Council



6 March 2024



**Hamilton
City Council**
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to all five priorities.

Council Approval and Reference

This submission was approved by Hamilton City Council's Infrastructure and Transport Committee at its 5 March 2024 meeting.

Submission # 756.

Key Messages and Recommendations

1. Hamilton City Council welcomes the opportunity to make a submission to the Waikato Regional Council's **Draft Waikato Regional Land Transport Plan 2024 – 2054**.
2. We support the overall strategic approach of giving effect to national and regional climate change and environmental sustainability outcomes, as well as prioritising the integration of land use and transport planning.
3. We also support the 2024 Regional Land Transport Plan change of responding more urgently to climate change and resilience issues, including the role of the Regional Land Transport Plan (RLTP) in meeting nationally required transport emissions targets.
4. We endorse the five key issues and objective areas for the 2024 RLTP:
 - a. Climate change.
 - b. Resilience.
 - c. Safety.
 - d. Accessibility/transport options.
 - e. Growth and economic development.
5. We note that the vision of *"An integrated, safe, and resilient transport system that delivers on the well-beings of our diverse Waikato communities"* does not necessarily support the prioritisation of climate change and resilience objectives and their combined weighting of 40%, and we recommend including a reference to low-emissions, low-carbon, or similar in the vision statement itself so that the importance of responding to climate change is accurately reflected.
6. We suggest that the resilience targets are currently limited in their scope and do not reflect the resilience objective of *"an efficient and resilient land transport system that ensures communities have route security and access to essential services"*. We recommend that the resilience targets, which currently only focus on state highways, also address resilience of the public transport, biking and micromobility network.
7. We support the strategic objective for 'Growth and economic development', particularly the aspect regarding supporting compact urban form and planned future growth. However, we recommend that this objective include greater emphasis on enabling future growth areas to enable reductions in embodied carbon associated with new infrastructure.
8. We strongly support collaboration with the Waikato Regional Council in the development of infrastructure that enables transport options and improving public transport reliability and frequency.
9. We agree that we are in a better position to understand what needs to be delivered to achieve some of the transformative projects and transport activities that have been identified as priorities for implementation in the Metro Spatial Plan Programme Business Case. We note that we are not in a better position financially to deliver this work.
10. We note that the information provided by Hamilton City Council for the tables in Appendices G, H and I is out of date in the context of the development of the Hamilton City Council Long Term Plan. Hamilton City Council will provide the latest information for the final publishing of the 2024 RLTP.

Introduction

11. Hamilton City Council welcomes the opportunity to make a submission to the Waikato Regional Council's **Draft Waikato Regional Land Transport Plan 2024 – 2054**.
12. We offer the following observations and comments according to the main headings in the document.

'RLTP at a Glance' Diagram

13. We support and are pleased to see the level of ambition set by the headline target of 41% reduction in transport generated carbon emissions by 2035 (from 2018/19 baseline), on the path to net zero by 2050.
14. However, it would be useful to have an explanation of how this target has been calculated, particularly as it is such an ambitious goal. 'Appendix A: Summary of supporting evidence for key transport issues' simply states that the target is *"consistent with the Emissions Reduction Plan and numerous other national and international commitments"*, and we would encourage at least this level of detail, and ideally more information, to be provided in the main document itself so that all readers can understand that this goal is ambitious but necessary.
15. An explanation of *"on the pathway to net zero by 2050"* is also required, as it is not clear what this means, and it is open for interpretation. For example, is this saying that the goal is to achieve net zero by 2050, or is there a level of variation that will be accepted?
16. We support and are pleased to see the inclusion of resilience targets. However, we consider that the targets are currently limited in their scope and do not reflect what the resilience objective is trying to achieve i.e., *"an efficient and resilient land transport system that ensures communities have route security and access to essential services"*.
17. The current resilience targets only focus on state highways and the number of/duration of unplanned closures annually. We need to also be considering things like resilience of the public transport/bus network and our biking and micromobility network, particularly as we move towards a more multi-modal transport network and are encouraging people to use these lower-carbon forms of transport (which the 2024 RLTP itself sets out to do).
18. Alternatively, targets related to this could be captured under the climate change objective as this objective aims to enhance our communities' long-term resilience to the effect of climate change.
19. The draft resilience targets as they currently are, also need to include the baseline year that the reductions will be measured from i.e., what year will the 10% reduction by 2035 be measured against?
20. We question whether the stated target for Accessibility/Transport options (*"Double PT and active mode share by 2035 from 2018 levels"*) aligns with the targets in the Metro Spatial Plan Programme Business Case (page 982). Doubling PT and active mode share by 2035 from 2018 levels, considering that the 2018 figures are low, does not seem adequately aspirational.
21. We note that the top and bottom boxes under 'Programme Implementation' should also refer to road controlling authority Low-Cost Low Risk programmes, which also encourage mode shift, reduce transport emissions, and address road safety.

Strategic Approach to Land Transport

22. We support the overall strategic approach of giving effect to national and regional climate change and environmental sustainability outcomes, as well as prioritising the integration of land use and transport planning. We also support the 2024 RLTP change of responding more urgently to climate change and resilience issues, including the role of the RLTP in meeting nationally required transport emissions targets.

- 23.** We endorse the following five key issues and objective areas for the 2024 RLTP:
- a.** Climate change.
 - b.** Resilience.
 - c.** Safety.
 - d.** Accessibility/transport options.
 - e.** Growth and economic development.
- 24.** We recommend considering a greater emphasis on housing affordability as this would align more to Access Hamilton and Metro Spatial Plan key objectives.

Key Drivers Shaping the 2024 RLTP

- 25.** We acknowledge that the strategic policy framework for the Draft 2024 RLTP was developed through 2023 under the policy environment of the previous Labour government, and therefore there could be further unknown policy drivers that reflect priorities of the new coalition government.
- 26.** We note that the Future Proof Strategy has not been mentioned as a key driver in shaping the 2024 RLTP. We therefore suggest that key references to this strategy are included in the final 2024 RLTP.
- 27.** We support the prioritisation of climate change and resilience objectives and their combined weighting of 40%.
- 28.** However, the vision of *“An integrated, safe, and resilient transport system that deliver on the well-beings of our diverse Waikato communities”* does not necessarily reflect this prioritisation. Specifically, it is missing any mention of emissions reduction that is so crucial to the future of our transport network and is outlined in detail throughout the RLTP document. We would suggest including a reference to low emissions, low carbon, or similar in the vision statement itself so that the importance of responding to climate change is accurately reflected.

Vision and Objectives - What the RLTP is Trying to Achieve

- 29.** We support the vision for land transport in the Waikato Region of *“An integrated, safe and resilient transport system that delivers on the wellbeing of our diverse Waikato communities”*.
- 30.** We support that the 2024 RLTP seeks to:
- a.** Continue to build on the momentum set in the 2021 RLTP.
 - b.** Secure funding to invest in the regional land transport priorities across all five objective areas.
 - c.** Secure funding for transformative projects and transport activities that will make substantial progress towards shaping a future transport system that delivers on emissions reductions and provides for the future transport needs of our communities.
 - d.** Demonstrate that the region is ready to take up opportunities to shape the future transport system, which will have wider national benefits beyond the region.
- 31.** We support the strategic objective *“Climate change - an environmentally sustainable, energy efficient and low-carbon transport system that delivers emissions reductions and enhances communities long-term resilience to the effects of climate change”*.
- 32.** We support the strategic objective *“Resilience - an efficient and resilient land transport system that ensure communities have route security and access to essential services”*.

33. We support the strategic objective for 'Growth and economic development', particularly the aspect regarding supporting compact urban form and planned future growth. However, this objective could include greater emphasis on enabling future growth that is low carbon, to ensure that new growth areas have this embedded right from the beginning. This will enable reductions in embodied carbon associated with new infrastructure (as well as operational emissions from the ongoing use of transport network in these areas).
34. We support the strategic objective 'Accessibility and transport choice', particularly the aspect regarding providing transport options for differing community access and mobility needs. However, we caution use of 'choice' and 'option' interchangeably, recommending 'option' as this better describes Council's responsibility i.e., we provide options for people to make choices.
35. For our region to experience an equitable transition to a low carbon future, we need to recognise the existing inequalities and barriers for our community to participate in low carbon transport modes. We must ensure that we are providing the right options for those who can and are able to use low carbon forms of transport (for example, shifting unnecessary private vehicle journeys to another, lower carbon mode), while recognising that there are others in our community who will be less able to change their transport mode (for example, due to limited mobility or disability). Infrastructure and services that respond to this challenge are key to supporting the wellbeing of our communities as we respond to climate change and reduce our emissions.
36. With regard to the comment *"The region is now in a much better position to deliver on some of the transformative projects and transport activities that have been identified as priorities for implementation in the Metro Spatial Plan Programme Business Case"*, we recommend that the term 'deliver on' is replaced with 'understand'. While we are in a better position to understand what needs to be delivered to achieve the change, we are not in a better position financially to deliver this work.
37. This section also states that *"It is in our largest metro area where we can make the most significant advances in reducing carbon emissions from the transport sector"*. However, at this point in the document, the Waikato context and map of metro and regional areas has not been provided. As such, we suggest including a map in the final 2024 RLTP showing the *"largest metro area"* so that it is clear where the responsibility lies for delivering the majority of the change required in our transport network.

Key Transport Issues and Challenges

38. We agree with the urgency weightings for the five key issues for the Waikato Region:
 - a. Climate change and resilience (40% weighting).
 - b. Growth/economic development and accessibility/transport options (35% weighting).
 - c. Safety (25% weighting).
39. We agree that over the next 30 years, significant transformation of the Waikato transport system is needed to address challenges, including meeting national emissions reductions priorities, to make significant progress on the region's key transport objectives.
40. A key issue/challenge that has not been identified in this section, is the level of communications with and to the community, and enabling change in their behaviour, that is required to achieve the RLTP outcomes.
41. People use our transport network every day for different things, and the changes we are talking about are completely transformational. If we are going to succeed in achieving the vision set out in the 2024 RLTP, there needs to be much better communications and behaviour change work that brings our various communities on the journey, so that they understand and are prepared for the disruption these changes will cause, and to achieve the benefits that the future sustainable, low carbon, resilient, and safe transport network will bring.

42. This is an issue faced by local governments nationally, and we have called for central government to recognise and support the significant role that local governments can play in delivering communications, engagement, and behaviour change work. It is not the sole responsibility of the Waikato Regional Council to lead this work for the region, and the communications and behaviour change required will be different for different areas of the Waikato.
43. However, it should be called out as a key issue in the 2024 RLTP, as without the right story-telling and mindset and behavioural shift in our community, who use and rely on this network every day, we will not be able to achieve the transformational change that we are after.
44. We recognise that this is starting to be addressed in the Hamilton-Waikato Metro Spatial Plan Transport Programme Business Case work, but it will be needed at a wider scale too i.e., for the other communities and projects that are occurring across the region.
45. It would be useful to provide a year and reference for each of the facts outlined. For example, on page 28 it states that *"16% of our regional emissions are from transport"* but looking at the PowerBI reports on the Waikato Regional Council's website, the dashboard shows transport as 18.5% of the 2021/22 profile.
46. We support and are pleased to see the breakdown of what is required to achieve the headline target for climate change, as this provides greater understanding of the level of change required to achieve emissions reduction. However, it is currently not clear whether this is in reference to the regional target outlined in Figure 2, and if so, whether it will achieve the 41% reduction by 2030, or net zero by 2050.
47. Baseline years for each of the targets are also required i.e., what year will the 24% reduction in VKT and the 100% increase in public transport be measured from?
48. Further work is also required to understand what the headline target for climate change actually means, at least across the Tier 1 urban areas.
49. We consider that a key issue/challenge is missing from Section 2.2.2 'Resilience and the impacts of climate change on our strategic corridors', which is the balance of funding the maintenance and renewal of the strategic transport network so that people can continue to move around as they need to, without jeopardising the low carbon network that we are trying to develop at the same time. For example, maintaining and renewing state highways in a way that supports current levels of car use, but not 'wasting' money on this as our transport behaviours become increasing less car-dependent in the near future (if we are to achieve the targets set in this and other documents).
50. We consider that responding to the challenge of growth will also require urban planning that focuses on reducing embodied and operational emissions from the very beginning.
51. This is somewhat supported by the point about 'optimising and prioritising road corridor space', but we consider that it is important to specifically highlight embodied emissions (as well as operational). This will encourage decision-makers across the region to fully explore opportunities to repurpose and reuse existing infrastructure (so long as it is safe and financially sustainable to do so), rather than building new infrastructure as a first priority.
52. We support the references to implementation of Metro Spatial Plan, the Regional Public Transport Plan and Access Hamilton initiatives to improve transport options and mode shift.

Key Opportunities

53. We particularly endorse the following opportunities listed in the Draft 2024 RLTP:
 - a. Implementation of the Hamilton – Waikato Metro Spatial Plan Transport Programme Business Case and the Access Hamilton 30-year strategy for Hamilton City, and in particular acknowledge the importance of community transport-based projects that form part of the Metro Spatial Plan recommended programme.

- b. Implementation of the Waikato Regional Public Transport Plan 2022-2032 to deliver an integrated network that improves regional accessibility and a transition to a ridership-oriented network for the Metro Spatial Area.
 - c. The future role of freight and passenger rail in our region.
 - d. Enhancing freight efficiency and mode shift to rail associated with the Ruakura Superhub.
 - e. Investment in building wider community resilience.
 - f. Provide innovative transport options that will support accessibility and people's mobility, and that will support regional economic development.
 - g. Deliver road safety implementation across the region, including innovative education programmes.
54. This section could also highlight how the transformational shift from our current transport network to a more multi-modal, low-carbon, sustainable and resilient one, has co-benefits such as:
- a. Improving the health and wellbeing of our people through walking, cycling, and moving more as part of their journey(s).
 - b. Reducing cost impacts e.g., by reducing reliance on petrol/diesel and instead moving to cheaper forms of transport such as bus/bike/walking/electric vehicles (recognising that EVs may have a higher up-front cost but are typically cheaper over the lifetime of the vehicle).
55. We support embedding Te Huia as part of Hamilton's core transport functions and expanding passenger rail connections between Hamilton and other urban areas. We also support improving the rail freight system, not only due to the climate and safety benefits, but also because fewer heavy vehicles on Hamilton's roads will improve the amenity of our city through reduced visual, noise and air pollution.

The Regional Transport System in 30 Years

56. We endorse the following 10-to-30-year outlook for the Waikato regional land transport system:
- a. A low emissions transport future.
 - b. Multi-modal transport options that are affordable, accessible, inclusive, and safe for our users.
 - c. Rapid and frequent passenger transport corridors.
 - d. A resilient, efficient, and safe strategic transport network.
 - e. More freight moved by rail and coastal shipping.
 - f. Enhanced inter-regional passenger rail in the Hamilton to Auckland corridor and intra and inter-regionally to Tauranga.
 - g. Proactive uptake of transport system technologies.
57. We endorse that the above outlook requires a sustainable funding model and national funding commitments to realise the region's strategic aspirations for the regional land transport system.

Summary of Regional Transport Priorities

58. We request that reference to the biking and micromobility, and Low-Cost Low-Risk walking and cycling programmes is included under 'Accessibility/Transport' options priority summary.

Climate Change

59. We request that travel 'choices' be changed to travel 'options' – it is only if travel options are provided that users have transport choices.

60. We recommend including supporting the development and improvement of travel options as part of the statement *“Encouraging growth in areas that already have good travel options and shorter average trip lengths”* as there are not many locations that already have good travel options in place.
61. We strongly support collaboration with the Waikato Regional Council in the development of infrastructure that enables transport choice options and improving public transport reliability and frequency.
62. While we absolutely support reference to implementing the Metro Spatial Plan and Access Hamilton, we submit there needs to be more emphasis on building connected and integrated networks, including implementing the Biking and Micromobility Business Case.
63. We recommend inclusion of travel demand management in the listed actions.
64. We note that there is a lot of information about how the Metro Spatial Plan will be critical for the climate change requirements, but this is not mentioned in the implementation actions at all in the table above.
65. While we don’t disagree with the statement *“Overall, investment in MSP implementation via NLTF and other implementation funding sources will make a significant contribution to meeting wider climate change targets”*, it assumes that there is enough funding to actually make meaningful change via the Metro Spatial Plan in the short-term. That will be unlikely for Hamilton City Council. Funding the Metro Spatial Plan, including building towards the Metro Spatial Plan in the short-term, is still a very big challenge and this should be noted in the 2024 RLTP.

Resilience

66. We submit that there is no action in the resilience stakeholder implementation actions with regard to the key priority of maintaining what we have. We encourage the 2024 RLTP to focus on a greater understanding of the gap in funding available for maintenance and renewal versus need for asset funding.
67. While we don’t disagree with the statement *“Waikato Regional Council to work with territorial authorities to develop regional guidelines for nature-based, climate-friendly urban design, transport and infrastructure networks”*, we submit that:
 - a. The focus on rural resilience needs to come first given the largest resilience issues are on the rural network.
 - b. There is recognition of the policies and guidelines that Hamilton City Council and other councils already have in place for a large amount of urban design, transport and infrastructure networks, and that this work, such as the Regional Infrastructure Technical Specification (RITS), isn’t replicated.

Growth and Economic Development

68. We recommend the problem statement is revised to refer to ‘goods’ rather than freight per se: *“...the efficient movement of people and ~~freight~~ goods”*.
69. We recommend reference to the Freight Study be added to the Metro Spatial Plan reference in Policy 12.
70. We submit that there are no headline targets to support the growth and economic development focus area which we believe is a key weakness of the 2024 RLTP. There are priorities for this focus area so there should be targets to support accountability and monitoring, such as:
 - a. How land use is enabled/influenced by transport e.g., intensification targets around rapid bus routes.
 - b. The amount of housing/business/industrial land that is enabled through transport investment in both brownfield and greenfield areas.

- c. New freight movement/freight growth being accommodated through the rail network, rather than increasing the number of trucks on the road as the freight task grows.

71. We acknowledge the statement *“The roll-out of the tranche of MSP activities that are identified in the regional programme of transport activities in Part B of the RLTP will represent the first step in a mid to longer-term roll-out of programme implementation identified in the MSP business case to transform the metro spatial transport system.”* However, we must emphasise that to support the Metro Spatial Plan, we need to prioritise Low-Cost Low-Risk improvements to our PT infrastructure (accessibility and safety emphasis, building and improving frequency while we investigate and improve capacity), improve the walking and biking network, and improve reliability and frequency on those key ridership services **in the short-term**, so we are actively **building towards** the Metro Spatial Plan and Bus Rapid Transit (BRT). **This emphasis on the short-term building towards the Metro Spatial Plan is missing from the 2024 RLTP in our view.**

Accessibility/Transport Options

72. We strongly support collaboration with the Waikato Regional Council in the development of infrastructure that enables transport ~~choice~~ **options** and improving public transport reliability and frequency.

Safety

- 73. We request that Road Controlling Authority implementation of safety improvement programmes is included in the listed Safety stakeholder implementation actions.
- 74. We request other road safety partners such as NZ Police and ACC are referenced as they are key road safety stakeholders and essential to the effective implementation of the RLTP.

Regional Programme

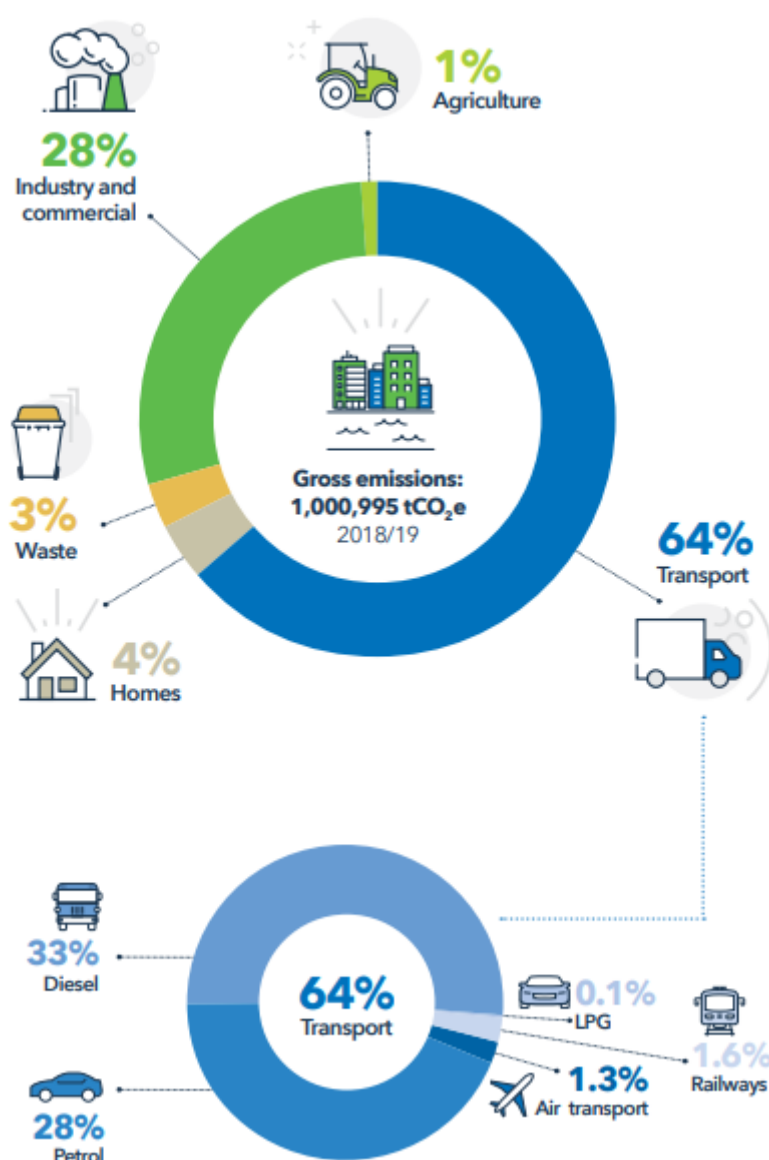
- 75. We submit the reason for the two graphs on page 65 is not clear.
- 76. We suggest removal of the RT1 term on Map 4 as MSP BRT Nort/East/South is adequate.

Monitoring Framework for the Plan

- 77. We submit that ‘Length of cycleways’ needs to be more specific as there on-road cycle lanes, off-road cycle paths and off-road shared paths, all of which provide specific and important facilities for cyclists.
- 78. We submit that *“Length of key social and economic corridors with viable alternative routes”* is linked into the Lifelines Corridors also as they are not limited to just state highways.
- 79. We submit that the Economic Prosperity measurements could benefit from edits to the travel time predictability indicator: public transport should be included alongside general/freight travel time. Public transport is the most efficient way to move large numbers of people, so having a reliable public transport network will support the Economic Prosperity outcome.

Appendix A: Summary of Supporting Evidence for Key Transport Issues

- 80. We note that this paragraph only provides a pie chart related to the main sources of emission in the Waikato Region. We believe it is worth including another chart for comparison which is very different and demonstrates the main sources of emission in Urban Areas (e.g., Hamilton), which would support further discussion in the paragraph related to high level of transport emissions that are generated in the Hamilton-Waikato metro area:



81. We note the list of the required interventions that will reduce emissions:

- a. Reduce VKT by 24%.
- b. Increase EVs to 30% of the light fleet.
- c. Increase PT by 100%.
- d. Increase walking by 100%.
- e. Increase cycling by 100%.
- f. Increase fuel economy by 10%.

82. However, it is not clear enough what year these percentages are related to, or their associated measures i.e., number of people using PT, walking, and cycling, or is it km travelled, or the length of routes that should increase by 100%? We also believe some further information would be helpful which provides more clarity about the current/base level of PT and walking and cycling.
83. We believe that the diagram in section 'Accessibility and transport options' is not adequately linked to description. There is no discussion in the paragraph that refers to numbers on this diagram and we suggest that an additional paragraph would be helpful that describes:
- a. Why the numbers highlighted on the diagram are important.
 - b. Interventions that are needed for "18% over 65" group and "20% to (sic) young to drive" group, and what accessibility issues they are experiencing.
 - c. Why school children and students have different needs and require different types of interventions justifying the need for further improvements to walking and cycling infrastructure and PT.
 - d. Focus on people's needs rather than people's age (e.g., xx% need access to School/University but cannot drive, xx% of aged population are mobility scooter users etc.).

Appendix G: Transport Activity Class Tables; Appendix H: Significant Transport Activities Table; Appendix I: Hamilton City Council Activities Outside the NLTF

84. The information provided by Hamilton City Council for these tables is out of date in the context of the development of the Hamilton City Council Long Term Plan and will need updating to the latest information before the final publishing of the RLTP. Hamilton City Council staff will liaise directly with Waikato Regional Council staff to get the information in these tables updated.

Further Information and Hearings

85. Should the Waikato Regional Council require clarification of the submission from Hamilton City Council, or additional information, please contact **Glenn Bunting** (Urban Transport Policy and Planning Manager – City Transportation) on **021 962 829**, email glenn.bunting@hcc.govt.nz in the first instance.
86. Hamilton City Council representatives would welcome the opportunity to discuss the content of this feedback in more detail with the Waikato Regional Council.
87. Hamilton City Council representatives **do wish to be heard** at the hearings scheduled for 26 – 27 March 2024.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

Hamilton City Council
Garden Place, Private Bag 3010, Hamilton

 /HamiltonCityCouncil

 @hamiltoncitycouncil

 07 838 6699

hamilton.govt.nz