



SUBMISSION

To: Stratford District Council

Submission: Connecting Our Communities Strategy 2021-2051

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Sent to: feedback@stratford.govt.nz

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Ia Ara Aotearoa Transporting New Zealand submission to Stratford District Council: Connecting Our Communities Strategy 2021-2051

Introduction

- 1 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) welcomes the opportunity to make a submission on the Stratford District Council (the Council) Connecting Our Communities Strategy (the Strategy).
- 2 As a national road freight association, Transporting New Zealand has members throughout Taranaki who we have consulted with on this submission. Stratford plays a central role as a service centre for the entire region. Transporting New Zealand is also represented in the area by one of our regional sector advisors, Sandy Walker.¹

Submission summary

- 3 Transporting New Zealand is broadly supportive of the Strategy and acknowledges the importance of developing a more inclusive transport network and improving road safety.
- 4 Transporting New Zealand proposes the following additions:
 - 4.1. We submit that the Strategy should give greater consideration to the “Improving Freight Connections” and “Climate Change” strategic priorities in the Government Policy Statement on Land Transport (2021 to 2031) (the GPS).
 - 4.2. We submit that consideration should be given to including road safety measures (traffic accidents, incidents of death, and serious injury) in the investment objective performance indicators (section 10).
 - 4.3. Section 4.2 *Accident Statistics* should include references to the cause / who was at fault (where that data is available).
 - 4.4. We submit that the Strategy should include consideration of a heavy vehicle bypass in the *Policies* and *Opportunities and Initiatives* sections.
 - 4.5. We submit that the *Speed* section (7.1.5.) should include references to engineering and enforcement solutions, and commit to evidence-based speed policies that contributes to the credibility of speed management.
- 5 Transporting New Zealand is grateful for the opportunity to participate in this Council consultation. We would appreciate being notified about further transportation plans and programmes that follow on from the Strategy.

A safe, inclusive road network

- 6 Transporting New Zealand supports the three guiding statements set in the *Purpose* section (1.1.) and the reference to prioritising effective and efficient investment.
- 7 Our submission provides specific feedback on the Strategy below. However, to broadly outline our organisation’s position on inclusive transport networks:

¹ Additional general information about Transporting New Zealand is provided at the end of this document.

- 7.1. All transport investment should be based on robust cost benefit analysis using well accepted methodologies, rather than informed by an ideological preference for one mode over another.
- 7.2. We are generally supportive of investments and engineering decisions that separate vulnerable road users and tourists from general road traffic and road hazards. This includes the development of the Forgotten World Highway 'epic ride' (7.1.2) and other off road cycling and walking links mentioned in the Strategy (page 32).
- 7.3. Revenue collected from road user charges (the majority of which is paid by heavy vehicle operators) should be used to maintain and invest in the roading network. After all, RUC rates are calculated by vehicle's estimated impact on road pavement. Investments in walking, cycling and other modes are more appropriately funded by general taxation.
- 7.4. Road design intended to assist vulnerable road users must take into account the needs of trucks and their operators so they can be operated at maximum safety.

Weighing strategic priorities

- 8 Transporting New Zealand considers that the Strategy should give greater consideration to the *Improving Freight Connections* and *Climate Change* strategic priorities in the GPS. We are concerned that the current framing of the two leading priorities at 1.2 and 3.1.2 may encourage *Safety* and *Better Travel Options* to be viewed in isolation.
- 9 While we accept that *Safety* and *Better Travel Options* have the most direct relevance (as stated at 1.2 of the Strategy), creating a more inclusive transport network will necessarily involve a weighing of all four priorities. As stated in the GPS, the four strategic priorities are inter-related and overlap.²
- 10 The overlap between the priorities is particularly relevant in Stratford, with SH3 and SH43 intersecting in the Town Centre. Decisions including speed limit reduction or "traffic calming" (7.1.5) and cycle and pedestrian first approaches (7.1.4) could have material impact on freight efficiency and disrupt fuel efficient driving (due to stop-start driving and additional acceleration and braking) if all four priorities are not adequately considered. As the Strategy notes, the Stratford section of SH3 alone has an average traffic volume of 15,056 vehicles per day, that will include a considerable number of heavy vehicles (2.2).
- 11 When considering the GPS priorities in the Strategy, it is also important to note that functional road freight routes are essential to the success of the Taranaki region. Waka Kotahi NZ Transport Agency's National Land Transport Programme 2021-24 states:

*"Reliable freight routes are the life blood of Taranaki. The region relies on SH3 to get goods north to Waikato and road and rail connections south through the Manawatū to the rest of the country and international markets"*³

12 Transporting New Zealand proposes the following amendments to the Strategy:

- 12.1. Including a reference to all four Strategic Priorities in Section 1, and their inter-relation and overlap.

² Government Policy Statement on Land Transport (2021 to 2031), at pages 6 and 13.

³ Waka Kotahi NZ Transport Agency 2021-24 NLTP Regional Summaries: Taranaki, published August 2021.

12.2. Including the GPS Strategic Priorities Graphic⁴ at 3.1.2, as has been done at Figure 1: Transport Outcomes at 3.1.5.



12.3. Including “Climate Change” in the list of the four GPS strategic priorities at 3.1.2. It appears to have been omitted from the bullet points on page six.

12.4. Including a reference to the essential role that efficient road freight plays in Stratford and the wider Taranaki region at section 2.2 *Roading Network*.

Performance indicators

- 13 Transporting New Zealand supports the Strategy’s focus on improving road safety outcomes (alongside Accessible Streets and Road to Zero). The roads are the workplace for many of our members, and no business wants to see their staff involved in, or having to witness, traffic accidents and road fatalities.
- 14 Transporting New Zealand commends the safer system principles and aspirations of Road to Zero. However, we have consistently expressed concern to local and central government that investment is being targeted at speed management, enforcement and marketing, rather than more effective investments in roading improvements. This concern was borne out in the latest GPS Annual Report, that observed that deaths and injuries rates are increasing as COVID-19 travel restrictions ease.⁵
- 15 It is essential to rigorously assess the performance of road safety investments. We are concerned that the Strategy’s Performance Indicators do not expressly include deaths, injuries and accident rates. Instead, there is a deliberate focus on perceived safety and outcomes, assessed through community and visitor surveys.
- 16 As the Strategy notes at section 4.3 *“perception is complex; it is individual and dependant on numerous factors”*. We submit that subjective performance indicators need to be carefully considered against objective safety metrics, to effectively measure progress and achievement. This would also complement the Strategy’s existing references to prior accident statistics at section 4.2.
- 17 In relation to section 4.2, we also consider that the *Accident Statistics* should include a reference to the cause / who was at fault. Without this the data lacks context and doesn’t properly identify how future tragedies can best be avoided.

⁴ Government Policy Statement on Land Transport (2021 to 2031), at page 6.

⁵ Ministry of Transport *Government Policy Statement on Land Transport 2018 Annual Report (Year 3)*, published June 2022.

18 Transporting New Zealand proposes that:

- 18.1. Consideration be given to incorporating objective road safety measures (including traffic accidents; incidents of death and serious injury) in the investment objective performance indicators (section 10).
- 18.2. That the ongoing performance of the Strategy be assessed against other road safety strategies and investment programmes, to ensure the best outcomes for all road safety stakeholders and the most efficient use of funding.
- 18.3. Section 4.2 *Accident Statistics* should include references to the cause / who was at fault (where that data is available). Without this the accident data lacks context.

Heavy vehicle bypass

- 19 Transporting New Zealand considers that a long term, high-level document like the Strategy presents a great chance to be aspirational when it comes to developing a safe, convenient and attractive road network for Stratford.
- 20 We are concerned that the Strategy's *Opportunities and Initiatives* and *Policies* are not sufficiently ambitious, given it looks through to 2051.
- 21 Transporting New Zealand submits that the Strategy should include consideration of a heavy vehicle bypass for the Stratford Town Centre. Heavy vehicle bypasses and other Green Infrastructure are an important element of Transporting New Zealand's six-pillar "Green Compact" – our organisation's roadmap for decarbonising commercial road transport by 2050.⁶
- 22 The Strategy states that SH3 and SH43 currently segregate community facilities⁷, impede walking and cycling⁸, and impact on perceived safety.⁹ Roding investment that relocates heavy vehicle traffic from the Stratford Town Centre would address these issues, and have substantial environmental, safety and accessibility benefits.
- 23 Although a heavy vehicle bypass would primarily be the responsibility of Waka Kotahi NZ Transport Agency, the Strategy can still reasonably identify it as an investment opportunity. After all, Connecting our Communities supports the national strategies of Accessible Streets and Road to Zero, and references opportunities for external funding (11.2).

24 Transporting New Zealand proposes:

- 24.1. Inserting a "Heavy Vehicle Bypass" section in the *Opportunities and Initiatives* section at 7.1.7. noting that investment in a heavy vehicle bypass for the Stratford Town Centre as an opportunity to improve the network. Alternatively, this opportunity could be added at 7.1.4 "Road Hierarchy".

⁶ In April 2022 Transporting New Zealand adopted the International Roding Union's "Green Compact" on emission reduction. The Green Compact establishes five decarbonisation pillars: alternative fuels, efficient logistics, collective mobility, vehicle technologies and driver training. To reflect New Zealand's roding and political environment, Transporting New Zealand has added a sixth pillar: designing infrastructure to lessen emissions (Green Infrastructure). Transporting New Zealand will be releasing our Green Compact outline shortly.

⁷ At 2.1.

⁸ At 6.1.

⁹ At 4.3.

- 24.2. Amending the *Policies* section (Investment Objects 1, 2 and 3) to include a reference to the Council investigating, encouraging and supporting proposals for investment in a heavy vehicle bypass for the Stratford Town Centre.

Speed

25 While we accept that evidence based speed-limit adjustment can play a key part in road safety and accessibility, it cannot be considered in isolation. We are concerned that the *Speed* section of the Strategy suggests a pre-determined commitment to speed limit reduction, without referencing other tools and considerations.

26 **We submit that the Speed section (7.1.5.) should include express references to:**

- 26.1. Engineering and enforcement solutions (including speed cameras and hazard signage).
- 26.2. Evidence-based speed policy that contributes to the credibility of speed management.

Support for inclusive transportation and request for ongoing consultation

- 27 Notwithstanding our proposed additions and amendments above, Transporting New Zealand is broadly supportive of the Strategy and acknowledges the importance of developing a more inclusive transport network and increasing road safety.
- 28 We are happy to answer any questions or provide further information relating to our submission that may assist the Council.
- 29 Transporting New Zealand would appreciate being notified about further transportation plans and programmes that follow on from the Strategy. This could include being listed as a stakeholder at section 5.1.

About la Ara Aotearoa Transporting New Zealand

la Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our members operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand's purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

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