



**ENM submission on
Horizons Regional Council's Draft Regional Land Transport Plan 2015-2025
(2018 Review)**

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Submitted By:

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Speaking to our submission:

Environment Network Manawatu would like to speak to our submission. Currently our preferred day is Thursday February 22nd (am) however our availability may change.

Thank you for the opportunity to make a submission on Horizons Regional Council's Draft Review of the Regional Land Transport Plan 2015-2025 (hereafter 'the Draft RLTP 2018 review').

About ENM

Environment Network Manawatu (ENM) is a coordinating and umbrella organization for Manawatu-based environmental initiatives. ENM is an incorporated society, governed by a Management Committee of volunteers, elected by and accountable to our member groups. Currently, ENM has 50 group members¹, which make up a large portion of the environmental community sector in the Manawatu area. A sizeable portion of the groups are based in and around Palmerston North. ENM currently receives a substantial amount of funding from PNCC, under their Fee-for-Service scheme. We also receive significant funding from Lottery Community grants. Other sources of funding for ENM are other government agencies and grant providers.

General Comments

As we noted in our 2015 submission on the Draft Regional Land Transport Plan (RLTP), ENM is particularly interested to support initiatives in the Plan that will lead to a more environmentally sustainable transport system in the region. This means reducing people's dependence on private vehicles for personal travel and promoting more sustainable (and affordable) modes such as public transport, walking and cycling. It also means reducing the economy's dependence on fossil fuels.

In legislating for a three-yearly review of RLTPs, Parliament intended that the RLTP be kept up to date with new information and developments. In the case of transport, there are significant new developments that need to inform the Draft RLTP 2018 review. In particular, we now know the detail of the December 2015 Paris Agreement and we also have information about trends in road transport emissions. Both sets of information highlight the need to review the order of importance given to the strategic priorities.

We note that the Draft RLTP 2018 Review incorporates a refocus on strategic priorities for the Region's land transport needs looking forward to 2025. We also note that the Draft RLTP 2018 Review is seen as an opportunity to tie priorities into two existing work streams, namely, the Accelerate25 Manawatu-Whanganui Economic Action (hereafter 'Accelerate25') and Accessing Central New Zealand (ACNZ), which leads on from Accelerate25 by focusing on a number of connected strategic projects to plan and implement a cohesive, resilient and connected transport network to, from and within the Region.

¹ Our member group NZ Landcare Trust has a formal, blanket "no submissions" policy and is not represented by this submission.

ENM notes that these projects were strongly shaped by central government policies in the 2015-2017 period. As such, a focus on environmental sustainability and regional growth from environmentally sustainable activities was displaced by the Business Growth Agenda priorities of the then National government. Going forward, the momentum and even some of the justification for those projects may diminish. For example, it is clear that the Labour New Zealand First Coalition Government intends to have a significant investment in regional rail and to introduce a Zero Carbon Act and an independent Climate Change Commission based on the recommendations of the Parliamentary Commissioner for the Environment.²

Our submission therefore focuses primarily on the strategic priorities and their order. This submission draws on points made in our 2015 submission which have been given fresh currency by the formation of the new government in October 2017.

We reiterate these points because, although we are very pleased to see that the Draft RLTP Review 2018 has recognised the new government's priorities for the GPS 2018, as signalled by the new Minister of Transport, we consider that the Draft RLTP Review 2018 does not fully reflect the significance of these new priorities:

- giving public transport greater priority in cities and expanding the public transport system to support new housing and interregional commuting
- increasing the use of rail to enable efficient passenger and freight use;
- supporting regional development;
- increasing support for active modes – walking and cycling;
- delivering health, safety and environmental improvements;
- reducing the environmental impact of transport;
- mode neutrality in freight transport planning.

We feel these new areas of focus have not been sufficiently woven into the Draft RLTP 2018 Review. To a large extent, this is due to the short time-frame but also because of the imbalance in the two key projects (Accelerate25 and ACNZ). For example, Figure 1 shows the key initiatives for ACNZ which are all roading projects. It is difficult to see how these projects are mode-neutral for freight transport.

The environmental effects of increased numbers of private and commercial (especially freight) vehicles are significant yet these two projects (and the Draft RLTP 2018 Review) encourage even greater numbers of vehicles on the roads in our region.

It is widely accepted internationally that traffic growth and economic growth need to be decoupled. The Draft RLTP 2018 Review refers to transport being a key enabler of growth but is very focused on just one mode (vehicles) despite acknowledgement of the importance of rail in para 2.5. Much greater attention needs to be given, for example, to the integration of road and rail in Palmerston North's North East Industrial Zone than is suggested on page 21 where the qualifier "potentially" is used.

Strategic Priorities

Based on the comments above, ENM recommends that the **first** strategic priority should be:

1) Effective, accessible and affordable multi-modal transport networks.

Given the importance of a resilient transport system, ENM recommends that the **second** strategic priority should be:

2) Improve connectivity, resilience and the safety of strategic routes to and from key destinations linking north-south and east-west while factoring in demographic changes and impacts on land use.

However, the focus needs to be on reducing dependence on roading and include much greater use of rail for freight and inter-regional passenger transport.

Recognising the importance of tourism, ENM recommends that the **third** strategic priority should remain as:

² We note the Coalition Government was formed by the Labour and New Zealand First Parties (not Labour, New Zealand First and Green Parties as stated on page 8 of the Draft RLTP 2018 Review).

3) An appropriate network of tourism routes.

In light of the significant environmental benefits of walking and cycling (and the very significant increase in e-bike sales), ENM recommends that the **fourth** strategic priority should remain:

4) An integrated walking and cycling network.

ENM does not see any need for Effective and Efficient Road Maintenance and Delivery to be a strategic priority. This will be encompassed in the first two strategic priorities. The maintenance of the existing roading network at its current level of service should not be the most important deliverable of the Plan, for the reason that this does not contribute to improved safety, resilience and environmental sustainability, which ENM considers should be key aims of this Plan over the next decade.

If there is a view that additional strategic priorities are useful, then we suggest that consideration be given to ones we supported in 2015:

- **Plan for and proactively respond to demographic change and impacts of land use change to ensure that the land transport system is resilient, environmentally sustainable and meets the needs of all sectors of the community**
- **Efficient, accessible, and affordable public transport networks**

The accessibility and affordability of public transport networks are particularly important to those who have limited transport options, including those under financial pressure, for example tertiary students.

In general, we would like to see more reference within the RLTP to the importance of engaging with members of the community, user groups and others, in the planning and development of transport networks.

Given our recommendations for changed strategic priorities, we do not wish to comment in detail about the policies for the strategic priorities in the Draft RLTP 2018 Review. However, we do wish to make a few comments about some of the measures in the Draft RLTP 2018 Review.

Comments about some measures in Draft RLTP 2018 Review

Measures	ENM Comments
Complete the decision-making process for an alternative route to the Manawatū Gorge and construct and implement the new alternative east west connection.	Ensure adequate provision for pedestrians and cyclists in the Manawatū Gorge SH3 alternative route(s). At present cycle safety is very compromised. Cycle tourism is important to the national and regional economy.
Complete investigations of necessary improvements to the Wellington Northern Corridor from Ōtaki to north of Levin and implement the identified improvements.	Ensure adequate provision for pedestrians and cyclists in the WNC. At present pedestrian and cycle safety is very compromised. Cycle tourism is important to the national and regional economy. Ensure roading is integrated with passenger rail.
Implement the recommendations of the Joint Transport Study, and continue to advocate for alignment of the Accessing Central New Zealand project areas.	Review these recommendations as the Study does not give adequate consideration to environmental impacts.
Implement safety realignments on strategic routes in identified priority order through the Plan.	Ensure adequate provision for pedestrians and cyclists in all safety realignments on strategic routes.
Identify and advocate for improvements on activities identified as having inter-regional significance.	Ensure rail is optimised for inter-regional connectivity.
Submit on District Plan reviews and land use proposals to ensure effects of development on existing and future networks are avoided or mitigated.	Much greater advocacy of land-use/transport integration needed.
Increased tonnage moved by rail.	Support.

Increased GDP per capita in the Region.	Ensure economic growth is decoupled from traffic growth.
Implement the recommendations of the Regional Growth Strategy and Central Agribusiness Strategy, where appropriate.	Review these recommendations to ensure environmental (especially climate change) impacts are fully considered.
Increasing number of high productivity vehicles on high productivity motor vehicle routes.	Do not increase HPMVs until further research on impact on cyclists is carried out and use of rail is optimised.
Contribute to the review of district and regional planning documents to ensure alignment with the Regional Land Transport Plan.	Support – with particular focus on promoting multi-modal transport system and reduced road transport emissions.
Reduction in five-year vehicle kilometres travelled rolling average in urban areas.	Support – with resourcing from Horizons to fund workplace and school travel plans
Maintain / reduce percentage of household consumption expenditure on transport.	Support – with resourcing from Horizons to fund workplace and school travel plans
Advocating on District Plan reviews / plan changes on land use proposals.	Support – with particular focus on promoting multi-modal transport system and reduced road transport emissions.
Collaboration with territorial authorities on walking and cycling strategies, new developments and urban growth.	More specific outcomes needed.
Increased population density in Palmerston North and Whanganui.	More specific targets needed.
Decrease in tonnes of CO2 emitted from domestic transport per capita.	Support – with resourcing from Horizons to fund workplace and school travel plans
Year on year growth in the use of the National Cycle Trail routes in the Region.	Support – with resourcing for safety improvements
Advocate for the development of new cycle trail routes, including the Manawatū Gorge and Feilding to Palmerston North cycle routes.	Not sure about Manawatū Gorge – see earlier comments about need to ensure adequate provision for pedestrians and cyclists in the Manawatū Gorge SH3 alternative route(s). At present cycle safety is very compromised.
Working with the tourism industry to raise awareness of the Regions tourist routes.	Support – but ensure focus on cycle tourism and rail tourism.
Complete construction of the Ruapehu-Whanganui Pathways - Ngā Ara Tūhono cycleway and the Pureora-Ongarue Central North Island Rail Trail.	Support
Complete construction of the He Ara Kotahi Manawatū Pedestrian Cycle Bridge and the Palmerston North to Linton shared pathway.	Support but additional work needed on safety improvements on adjacent urban cycle routes
Undertake pedestrian and cycling safety education programmes in selected high-risk locations.	Specific targets needed, developed collaboratively with user groups, with annual review.
Increased uptake of walking and cycling counts.	Specific targets needed with annual review.
Increase level of investment in walking and cycling facilities.	Specific targets needed, developed collaboratively with user groups, with annual review.
Review and implement the Regional Public Transport Plan (RPTP) to implement the public transport component of the Plan.	Specific targets needed, developed collaboratively with user groups, with annual review. Include within the review process representatives of low income groups reliant on public transport for financial reasons (for example students)
Implement the first principles review outcomes for the Palmerston North urban services.	Specific targets needed, developed collaboratively with user groups, with annual review.
Complete investigations into bus terminal improvements in Palmerston North and Whanganui.	ENM is disappointed at the continuing delays to improvements to the Main Street Terminal in Palmerston North. Improvements need to include facilities for cyclists.

Maintain existing rural bus services, and where feasible, introduce new services.	Specific targets needed, with annual review.
Investigate the provision of cycle carriers on buses in urban areas and on commuter services between centres.	This has been provided in Palmerston North but increased promotion needed
Provide improved bus service information where necessary.	Significant improvements are urgently needed, in particular, real-time information at bus stops and online bus tracking.
Investigate the feasibility of retaining or improving the current commuter rail service between Palmerston North and Wellington.	ENM supports this as a high priority – essential to have attractive alternative to private vehicles.
Increase public transport trips per capita.	Specific targets needed, with annual review.
Implement the Regional Integrated Ticketing System.	This should be given urgency

Conclusion

ENM thanks Horizons for the opportunity to make this submission. It is not just the significant impact of the Manawatū Gorge closure and the implications for the community of the SH 3 Manawatū Gorge alternative route, but also recent political developments that have highlighted the need for increased awareness of the need for our region to have a more resilient land transport system and one that is less dependent on the roading network. With a more multimodal land transport system there will be significant environmental gains.

Yours sincerely,

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 Environment Network Manawatu