



29 March 2021

Via email: transport@orc.govt.nz and policy@es.govt.nz

To the Otago and Southland Regional Transport Committees,

SUBMISSION ON THE DRAFT REGIONAL LAND TRANSPORT PLAN (RLTP)

Thank you for providing QLDC with the opportunity to present this submission. Officers have participated in the development of the programme presented, working to the parameters of a constrained funding environment. However, it's important to note that the district continues to face projected increased population demand and a potential infrastructure deficit in future. As such, it's essential that planning for the next RLTP continues unabated as there is still much to be done.

QLDC would encourage the Committees to place more emphasis in the plan on both resilience and climate action. Transport needs to focus on both adaptation and mitigation, recognising the strategic role it can play in behaviour change. As the RLTP highlights, Mode shift is one of the greatest challenges facing this RLTP. The provision of public and active transport options will be key to success and as such, QLDC would encourage the Committees to ensure that these modes automatically receive high priority status.

QLDC wishes to appear before the committee to speak to its submission. It should be noted that this submission reflects the position of officers and has not yet been ratified by full council.

Yours faithfully



Mike Theelen
Chief Executive

1.0 STRATEGIC DIRECTION

1.1 QLDC broadly supports the RLTP and thanks the Committees for the involvement of officers at earlier stages in the process. The RLTP reinforces the content and priority of some of the district's programmes.

1.2 QLDC supports the vision of the RLTP (p8), but would like to see the inclusion of resilience as an important aspect:

"A transport system providing integrated, quality choices that are safe, environmentally sustainable and support the regions' wellbeing, **resilience** and prosperity"

1.3 The objectives listed are supported by QLDC, with particular focus on the importance of 'connectivity and choice'. This will be essential for the provision of alternate transport modes and supporting behavioural change.

1.4 Where objective three reference "communities and business" (p42), the RLTP needs to clarify that this is inclusive of all users, including freight/haulage and visitors (domestic and international).

1.5 QLDC also strongly supports the objectives of 'environmental sustainability' and 'road safety, but does not consider either of these to be sufficiently represented within the draft RLTP (p9).

1.6 There are a number of issues in the draft RLTP that need to be addressed. These will be set out within the following sections:

- Timing and Programme
- Environmental Sustainability
- Systems Approach and Resilience
- Planning and Land Use
- Mode Shift and Behaviour Change
- Speed Management

2.0 TIMING AND PROGRAMME

The direction of the plan is sound, but low investment will impact service levels and community wellbeing.

2.1 The strategic direction of the plan is sound, but there is a lack of investment in the Queenstown Lakes District. Constrained funding opportunities both at a national and local level have resulted in a programme that does not address the district's escalating infrastructure deficit. This puts pressure on the service levels being offered and places delivery and community satisfaction at risk.

2.2 Personal private transport, congestion, parking, active travel and public transport are critical factors in the ability for our communities to have a high quality of life and a good standard of general wellbeing. Lack of investment in the district results in increased stress, time poverty, less active living and threatens community connections.

- 2.3 QLDC's 2020 Quality of Life survey highlighted that less than half of respondents felt that public transport was accessible for their needs, while even fewer felt that it meets the needs of all residents. Planning for further investment is needed¹.

Planning for higher levels of demand in the Queenstown Lakes District needs to continue, even if project interventions are deferred.

- 2.4 QLDC recognises that the current economic environment has resulted in the need for a prudent approach to all funding. However, it is important that planning processes are enabled to continue in preparation to higher levels of demand. Despite COVID – 19, QLDC's projections identify a rapid return to growth in population². This will have significant implications for all aspects of transport planning and must also include provisions for visitors to move around the district in a safe, low-emissions fashion.
- 2.5 QLDC requests the inclusion of a number of Pre-Implementation phases to ensure effective preparation for this return to increased demand. These include:
- Public Transport Interchange (2M)
 - Arterial route (2M)
 - Street Upgrade (2M)
 - Wanaka Active Travel Network (1M)
 - Arthurs Point Crossing (road bridge) (1M)
 - Parking Management – Travel Demand Management (TDM) (2M)

There is opportunity to improve the efficiency of the programme development process

- 2.6 The timing of the RLTP processes and its approvals are poorly aligned with other dependent processes relating to transport. It significantly hampers the delivery of a robust programme that spans the RLTP, the National Land Transport Plan (NLTP) and QLDC's Long Term Plan (LTP). This inefficient and frustrating situation creates complexity and uncertainty, making it difficult to allocate sufficient funding in the QLDC LTP when there is no security of funding from other parties. This also places our ability to reallocate local share funding at risk.
- 2.7 Unfortunately, the laborious nature NLTP/RLTP submission process exacerbated frustrations with the process further. It will be essential for the Transport Investment Online portal to be fully functioning for the next process, as the use of multiple spreadsheets introduced unnecessary risk for 2021-31.

3.0 ENVIRONMENTAL SUSTAINABILITY

- 3.1 Whilst environmental sustainability is highlighted as an objective (p9), there is little exploration of tangible action to achieve this within the plan. It is unclear as to how the strategic response translates to a programme response.

¹ <https://www.qldc.govt.nz/community/community-research#quality-of-life> p72

² <https://www.qldc.govt.nz/community/population-and-demand>

- 3.2 Intergenerational equity needs to be understood in more detail, ensuring that necessary interventions are not disproportionately shouldered by future generations. QLDC would encourage the Committees to focus beyond sustainability and consider how transport can be approached with a regenerative mindset.
- 3.3 Whilst not government policy, the RLTP may want to reflect on the potential implications of the Climate Change Commission's advice to government in relation to transport and the extensive behavioural change programmes that will be required.
- 3.4 The plan reflects the need to adapt to the impacts of climate change (p29), but a coherent approach to climate action (both mitigation and adaptation) is unclear. Transport is the highest source of greenhouse gas emissions in the district, with 37% of all emissions attributable to road transport³. The RLTP needs to recognise its role in the development of a strategic programme to counter this and help target net zero carbon emissions by 2050 as per the Climate Change Response (Zero Carbon) Amendment Act.

4.0 SYSTEMS APPROACH AND RESILIENCE

- 4.1 QLDC strongly supports the adoption of a systems approach (p55), but again would like to see the approach taking prevalence in the draft RLTP. The approach will need a clear methodology, governance and system-definition to be effective.
- 4.2 Currently not all elements of the transport system are reflected in the RLTP and will need to be included if a true systems approach is to be taken. For example, parking and its management is a critical TDM measure that does not feature in the RLTP and NLTP due to it not being assigned an activity class. The RLTP process needs to influence change in this regard.
- 4.3 The Lakeview Arterial Upgrade in Queenstown Town Centre (p69) is an example of where the RLTP is unable to take the systems approach needed. The implementation interventions have all been determined through the integrated approach that the RLTP champions, but is now being disaggregated into its component parts in the RLTP prioritisation process. Viewed separately, the parts of the project are not as compelling as the whole and are therefore disadvantaged and de-prioritised. The arterial route is needed to enable PT to operate, and remove cars from the town centre to enable better access, walking and cycling. Separating these into sub-elements is counterproductive and anathema to a joined-up, systems approach.
- 4.4 QLDC would like to see a greater level of resilience in the transport network within the district. Alternative routes other than State Highways exist in Queenstown Lakes District – such as the Malaghans Road option from Arrow Junction to Queenstown. QLDC would like the RLTP to advocate for higher levels of investigations into resilience.

³ <https://www.qldc.govt.nz/media/qyyn4f4d/qldc-2019-ghg-inventory-report.pdf> p4

5.0 PLANNING AND LAND USE

- 5.1 The RLTP needs to better reflect the inclusion of land use within its systems approach. The Queenstown Lakes District has needed to develop alternate transport modes and possibilities due to the lack of integration between land use and transport planning. The Spatial Plan will help to improve this situation over time, provided it is afforded legislative weight during the reform of the Resource Management Act⁴. QLDC would like to see the RLTP give further importance given to the Spatial Plan in transport and land use integration.
- 5.2 The Resource Management Act Reforms and the Three Water Reforms could fundamentally change the operation of local authorities within the life of this plan. The RLTP needs to acknowledge the implications of this for Road Controlling Authorities (RTAs) and the transition period needed.
- 5.3 Other changes in the planning environment also need to be reflected in the RLTP. For example, the National Policy Statement for Urban Development in high growth areas has significantly changed parking management. As noted at 4.2 this is not recognised as an activity that can attract funding, but its integration in the system is critical to success.
- 5.4 The 'Way to Go' partnership has successfully sought joint planning and approvals through the Queenstown Transport Business Case, which has enabled the following aspects of the programme to enter pre-implementation phases:
- Arterial (all stages)
 - Street Upgrades (both stages)
 - Public Transport Improvements and Interchange
 - Ladies Mile through Frankton to Queenstown (NZUP)
- 5.5 Demonstrating the integration of land use and transport planning has been key to the ongoing success of the collaboration and it will continue to lead the planning and investment phases of the transport improvement programme. Testament to the success of the partnership, has been the subsequent formation of a delivery Alliance to facilitate the physical works.
- 5.6 QLDC will partner with the Otago Regional Council (ORC) and Waka Kotahi to produce a Mode Shift Plan, once the TDM, Technology and Queenstown Traffic Operations Centre workstreams have been completed.

6.0 MODE SHIFT AND BEHAVIOUR CHANGE

- 6.1 QLDC strongly supports short-term priority three, creating genuine mode choice (p9). However, despite this being an urgent matter in the district, projects relating to public (p25) and active transport (p24 and 25) still need to be assessed through the prioritisation process. To ensure mode shift is achieved, QLDC recommends that all alternate mode interventions (including the Wakatipu Active Travel Network p69) should be automatically prioritised as 'high' throughout the RLTP.

⁴ <https://www.mfe.govt.nz/rma/resource-management-system-reform>

- 6.2 The public transport network in QLDC has been greatly improved since 2017. However, the speed at which the provision of regional services occurs in fast-growing areas such as the Upper Clutha, is hampered by onerous planning, investment and implementation processes. QLDC requests that this RLTP addresses the extension of public transport services to both Wanaka in the Upper Clutha and Cromwell in Central Otago during the 2021 – 24 period.
- 6.3 As interventions that clearly support this critical short-term priority, QLDC recommends that these processes are significantly simplified and administered through a faster, more agile process. A step change is required if the district is to achieve meaningful mode shift and achieve its emissions-reduction aspirations.
- 6.4 The RLTP needs to place far more emphasis on the need for effective behaviour change. Mode shift will require a disciplined, structured approach to behaviour change that challenges fundamental social norms in many parts of the region. Shifting the paradigm away from reliance on personal private vehicles will require significant expertise, tools, funding, regulation and resources. Significant investment will be required into strategic and non-infrastructure solutions and TDM needs to be strengthened as a tool for change. The importance of behaviour change needs far greater amplification and emphasis throughout the RLTP.

7.0 SPEED MANAGEMENT

- 7.1 It is unclear from the RLTP as to whether the Regional Transport Committee (RTC) is going to lead the Regional Speed Management Plan approach. Further direction is needed to define how we work locally and regionally to achieve speed management outcomes.
- 7.2 The RLTP needs to provide more clarity in relation to the investment and timing needed for the State Highways Speed Management Review. QLDC would like to see Waka Kotahi provide leadership in regional speed management.