



PROPOSAL FEEDBACK

To: Horizons Regional Council

Submission: Resource Consent Application and Notices of Requirement – Otaki to North of Levin Highway Project (Ō2NL)

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Sent to: consent.submissions@horizons.govt.nz

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Ia Ara Aotearoa Transporting New Zealand submission to the effected councils on the Waka Kotahi NZ Transport Agency (Waka Kotahi) lodging of Resource Consent applications and Notices of Requirements for the Ōtaki to North of Levin Highway Project (ŌN2L)

Introduction

- 1 Ia Ara Aotearoa Transporting New Zealand Incorporated (Transporting New Zealand) welcomes the opportunity to provide feedback on Waka Kotahi's applications and notifications in regard ŌN2L.
- 2 Transporting New Zealand acknowledges the relevant local authorities impacted by ŌN2L include Manawatu-Whanganui regional Council (Horizons Regional Council), Wellington Regional Council, Horowhenua District Council and Kapiti Coast District Council.
 - The Resource Applications are: APP-2021203231.00 and WGN230122
 - The Notices of Requirements are: 504/2022/22 and RM220254
- 3 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) provides leadership, advisory and advocacy to the transport industry and believes we all need to operate in an environment where the following must be managed and co-exist:
 - The safety and wellbeing of our drivers and other road users, our drivers are our most valuable asset
 - The impacts of transport on our environment
 - The transport of goods by road is economically feasible and viable and it contributes the best way it can to benefit our economy.
- 4 The predominant lens and scope of our submission is the impacts and risks associated with commercial (road freight) traffic and the economy that traffic serves.

Transporting New Zealand comments

- 5 For the reasons outlined in paragraphs 6 to 12 below Transporting New Zealand supports the ŌN2L project.
- 6 Transporting New Zealand supports Waka Kotahi's view that the ŌN2L project will bring significant transport safety, resilience and journey time benefits for all road users. This has been clearly demonstrated with last year's opening of the Transmission Gully Expressway and the more recent opening of the Peka Peka to Otaki Expressway.
- 7 It is indisputable that roads built to the highest design standard used in New Zealand, and particularly those that are multi-lane and median divided, are safer and they have the additional benefit of allowing traffic to operate at higher speeds.
- 8 The recent bank stabilisation works to make the rail network more resilient immediately north of Pukerua Bay on State Highway 59 (SH59) also demonstrates the benefit that another transport route brings to reducing congestion and increasing network resilience.

- 9 Transporting New Zealand sought and obtained traffic data for heavy and light vehicles respectively on SH59 and State Highway 1 (SH1) under the Official Information Act. The data Waka Kotahi provided covers the period April 2022 to November 2022. The data shows that typically, since the opening of Transmission Gully, during week days heavy vehicle traffic travelling on what was the old state highway, now SH59, has reduced by between 85% and 92%. This illustrates that the vast majority of trucks travelling between Wellington and Paraparaumu are using SH1 Transmission Gully instead of SH59. The data provided did not enable detailed analysis regarding the destinations of heavy vehicles using SH59 however, we expect a number of those trucks are moving freight or serving the communities that are accessed off SH59.
- 10 The reduction in heavy vehicle traffic on SH59 benefits the communities along that route making them safer and more environmentally friendly in terms of reducing heavy vehicle airborne harmful emissions and also reducing harmful particulates, such as those that come from brake systems and tyres, ending up in waterways.
- 11 A four-lane route benefits connecting communities and letting freight move more efficiently which in turn bolsters the economy.
- 12 Transporting New Zealand has adopted the International Road Transport Union's "Green Compact" on emissions reduction. The Green Compact establishes five decarbonisation pillars: alternative fuels, efficient logistics, collective mobility, vehicle technologies and driver training. To reflect New Zealand's roading and political environment, Transporting New Zealand has added a sixth pillar¹: designing infrastructure to lessen emissions sustainability. The Ō2NL project fits perfectly with the sixth pillar, in particular the Road Network element.
- 13 It is our view that for the reasons above, this project should be completed as soon as possible. Therefore, Transporting New Zealand supports the Applicant's request that the application be processed via a direct referral to the Environment Court because that approach should streamline the approval process.
- 14 Transporting New Zealand would like to take the opportunity to provide an oral presentation in support of its submission.

About Ia Ara Aotearoa Transporting New Zealand

Ia 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

¹ Appendix 1. Transporting New Zealand's Green Compact

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).

END

Appendix 1

Excerpt from Transporting New Zealand's The Green Compact our framework for decarbonising commercial road transport by 2050, the sixth pillar

VI Green Infrastructure

Intelligent infrastructure design can reduce unnecessary idling, acceleration and braking - reducing energy use and carbon emissions. Minimising congestion and ensuring efficient traffic flow is a double win for our operators: reduced emissions and faster service delivery.

Objective

Ensure that roading design is allowing energy efficient driving and minimising stop-start traffic. This can be done at a micro-level by limiting features like raised platforms and roading barriers, and at a larger scale by supporting significant improvements to our national roading network.

Our Green Compact commitment (2022-2024)

Transporting New Zealand added this sixth pillar to our Green Compact after seeing a concerning trend towards roading and urban design, and underinvestment in our roading network that is inconsistent with reducing emissions. Issues like decarbonisation, road safety and mode shift cannot be considered in isolation when designing and maintaining our roading infrastructure. Over the next two years, we will continue to engage with local and central government on this issue.



