



SUBMISSION BY NATIONAL ROAD CARRIERS (INC) TO THE DRAFT NORTHLAND REGIONAL LAND TRANSPORT PLAN 2021-2027 (2023 review)

Submission to: Draft Regional Land Transport Plan 2021-27 (RLTP)
Northland Regional Transport Committee
Northland Regional Council

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INTRODUCTION

1. National Road Carriers Association welcomes the opportunity to make a submission on Northland's Draft Regional Land Transport Plan 2021-27 (RLTP).
2. Our comments on the draft plan are focused on areas of interest to the freight transport sector in Auckland and Northland, with particular attention to concerns of our Northland members. In summary, these concerns focus on the need to improve local roads used by trucks carrying increasing volumes of heavy freight within Northland and strategic routes connecting Auckland and Northland as highlighted in the document.

BACKGROUND

3. National Road Carriers is New Zealand's progressive nationwide organisation representing 1500 supply chain company members, who collectively operate over 16,000 trucks throughout New Zealand including many located in, or who service customers in, Northland. National Road Carriers advocates on behalf of members and works with Central and Local Government on road transport infrastructure and regulations.
4. National Road Carriers' members are committed to providing an efficient, safe and high-quality road-freight service. To achieve this, trucking operators need a safe, efficient and sustainable operating environment that enables the efficient and safe movement of goods.

5. For decades, investment in New Zealand's local and national roading infrastructure has lagged well behind what's needed for a safe, productive and resilient roading network. This includes both the construction of new roads and the maintenance of existing ones.
6. The lack of investment is increasingly visible across New Zealand's roading network - from routes that are not resilient to weather events, to damaging potholes, to roads and lanes that are too narrow and therefore unsafe. This impacts truck drivers and operators, the broader transport industry and the country's productivity. Substandard roading infrastructure also creates an unsafe and unpleasant environment for everyone using our roads. In many situations, investments have been made but - without reliable evidence underpinning decisions or consistency of funding - outcomes have been ineffective.
7. Roothing investments and funding initiatives are easy for local and central governments to delay in the short-term, often for other legitimate priorities, without obvious consequences. But before long, the impact of either no progress or stop-start progress is noticeable and it becomes more and more expensive to catch up. This approach is unsustainable and effectively pushes the cost of maintaining and improving today's roads on to the next generation of New Zealanders.
8. The absence of a reliable infrastructure plan (and the funding to implement), free from conflict with short-term government priorities or other interests, also makes it difficult for the trucking industry and other infrastructure businesses to plan and invest for the long term.
9. National Road Carriers advocates for:
Development of a 50-year roading infrastructure plan that delivers a safe, productive and resilient roading network and helps New Zealanders and businesses connect to each other, and to the world.

SUBMISSION

10. The Submission Form asks for our comments on the Regional Priorities and the Transport Projects and Rankings outlined in the draft plan, plus any other comments we would like to make. Our response is set out below focusing on the Regional Priorities.

Regional priorities

Transport priority 1: Route resilience and security

11. National Road Carriers notes and strongly endorses many of the comments in the Foreword by Regional Land Transport Committee Chair Joe Carr as they almost uncannily mirror National Road Carriers' position outlined in the Background above. We endorse these comments:

"Northland faces the task of catching up on years of deferred road maintenance and lack of investment in resilience. Forewarnings of extreme weather events have not been heeded across the nation and known areas of ground instability in our strategic road network have failed. The incremental deterioration of roads that have been 'sweated' has finally caught up with New Zealand generally and Northland in particular."

"Northland's State Highway network, both within the region and between Northland and Auckland, is vulnerable to disruption. This has an adverse effect on both social wellbeing and the regional and national economy."

"A 'perfect storm' of coinciding factors including extreme weather events, lack of resilience and the poor condition of our roads has elevated maintenance of Northland's road network to a state of crisis management. Recent experience has found that crisis or event"

management is a far more expensive default option than having an appropriate maintenance and preventative management regime in place.”

“This paradigm shift by Government towards funding the best “whole of life” management of our roads must be strongly supported so that it endures governmental election cycles.”

“On behalf of the Northland Region, the Regional Transport Committee is strongly advocating for completion of a four-lane State Highway between Auckland and Whangārei.”

12. We also agree with the Problem and Summary of Evidence under Transport Priority 1 including:

“Secure transport connections are vital to ensure the security of supply of the goods, food and fuel that Northlanders depend on. As almost all of these supplies are delivered by road; road closures cause major disruption with no alternative means of supplying large areas of Northland.

“Disruption has resulted in significant economic loss and has reduced access to emergency and essential services.”

“Our region is growing, the volume of traffic is increasing and more freight is being moved on our roading network.”

13. We applaud the strong recognition given in the draft plan to the key role the freight sector plays in securing the prosperity of Northland. Improvements to the transport network would help stimulate Northland’s economic growth, especially in industries reliant on good road transport – dairying, forestry, fishing, horticulture and tourism. Conversely half-baked approaches will leave Northland at a disadvantage to competing regions, such as Waikato and Bay of Plenty.

In our view SH1 between Auckland and Whangarei is Northland’s ‘economic lifeline.’ Many of our members are involved in daily High Productivity Motor Vehicle (HPMV) freight runs taking vital freight from Auckland to Whangarei – for supplying supermarkets, manufacturers, hotels and motels, Northland’s retail sector and its farming community (e.g. fertiliser). The freight goes in both directions with Northland helping to meet Auckland’s need for raw materials and food.

14. Taking into account the draft plan’s accurate analysis of the critical importance of a resilient roading network to Northland’s economic and social survival and success, we **strongly recommend** this plan should include:

- Completing a four-lane highway from Warkworth to Whangarei with bypassing the Brynderwyns on the western side as an urgent priority
- Prioritising road over rail at this stage to avoid diverting funding and focus from the road network, which delivers 93% of goods. Rail upgrades should be considered only after the key road network projects are complete.
- Consideration of increasing the volume of freight transported by sea.
- Drainage improvements and raising bridges in flood prone areas – the new bridge at Kaeo is a model of what could be done elsewhere where there are low bridges.
- Prioritising upgrading the Northland state highway network and local roads to full HPMV status to increase productivity. Note: Research shows HPMVs cause less road damage than 45 tonne trucks as the weight is better spread across the axles.
- Prioritising more sealing or better maintenance of the region’s 60 per cent of unsealed roads which are used by logging trucks and milk tankers and are dangerous and dusty
- Detour roads being made fit for purpose – at present the increase of traffic on detour roads is causing these roads to fail
- Bridges on key freight routes being strengthened to take HPMV class vehicles. Too many are currently restricted to 45 tonne vehicles.

Transport priority 2: Reducing transport-related deaths and serious injuries

15. As with Priority 1, National Road Carriers we strongly agree with the draft plan's assessment of the road safety problem, namely:

"Many of Northland's roads and roadsides are not designed, built or maintained to take account of drivers making mistakes, resulting in a high number of crashes resulting in death or serious injury."

16. From the perspective of National Road Carriers' truck driving members, we **strongly recommend** the emphasis of road safety should be on safer roads and roadsides. We could not agree more with this statement in the draft plan:

"Our roads and roadsides must factor in that people make mistakes – including those who are usually careful and responsible drivers. We need to build a safe road system that is designed for people."

"While infrastructure safety treatments can be expensive, they have proven to be effective at reducing the number of fatalities and injuries on roads."

If our recommendations for Priority 1 are implemented – i.e. a four-lane highway from Auckland to Whangarei bypassing the Brynderwyns, drainage improvements and bridge raising, upgrading the Northland state highway network to HPMV status, and sealing unsealed roads – this will be a massive leap forward for the safety of all road users.

The draft plan refers to fatigue management. We **strongly recommend** the provision of many more safe places for truck drivers to pull over to rest and revive when they are tired. State Highway 15 should be prioritised for these in consultation with the industry.

We fully endorse the concern in the report given to dust from unsealed roads that create both a health and safety hazard that needs to be addressed.

Transport priority 3: Regional and national connectivity

17. Again, National Road Carriers agrees with the draft plan's assessment of the problems, namely local variances in the quality of infrastructure and changing demands on the transport network leading to a failure to meet community/business expectations.

Also identified as problems are pinch points such as the Brynderwyn Hills, unstable land, poor road pavement strength and peak season holiday traffic causing congestion.

We agree with the assessment that investment in the corridor will address three critical problems: a poor safety record, a lack of resilience and alternative routes, and the higher cost of moving freight as a result of long journey times.

18. We strongly support the draft plan's reference to NZTA's 30 year Connecting Northland series of projects including the Whangārei to Te Hana project.

We also support the implication in the report that Northland north of Whangārei should be recognised "as a producer region that contributes to the nation's GDP that requires a "fit for purpose" classification for roading infrastructure based on freight volumes rather than vehicle numbers. As the report says, recognition should also be given that these roads serve national and international tourism.

In our view planning should be on a 50-year basis (rather than the current 10 or 30-year plans) and Northland plans should be connected to Auckland's transport plans.

Transport priority 4: Economic and tourism development

19. National Road Carriers agrees that Northland's economic development is hampered by a substandard, damaged and fragile roading network. For example, while Waikato is full HPMV, poor Northland is stuck in a 44-tonne regime.

In terms of tourism development, the tourism sector is supplied with goods and building materials etc by our members carting from Auckland. Once again this comes back to Priority 1, building a fit for purpose network that resilient to natural events.

Transport priority 5: Reducing the environmental effects of transport

20. Regarding freight the draft plan focuses on reducing emissions by shifting freight to rail and coastal shipping. A high quality, fit for purpose roading network (Priority 1) will play a significant role in reducing road freight emissions by improving efficiency and effectiveness. National Road Carriers is also at the forefront of supporting alternatives to fossil fuel vehicles where appropriate including electric vehicles for town deliveries and hydrogen powered trucks for line haul.

It is likely that Road Transport will continue to transition to Zero emission vehicles during the timeframe of the RLTP. National Road Carriers would like to see provision for charging Infrastructure both on highway routes and within towns to allow for BEV trucks to re-charge.

Transport priority 6: Provide people with better transport options and consider the needs of the transport disadvantaged (including transport choices in rural communities)

21. While it does not directly involve our sector, we support the good intent of this priority.

Transport priority 7: Future proofing and long-term planning

22. As stated above under Background, National Road Carriers advocates for: Development of a 50-year roading infrastructure plan that delivers a safe, productive and resilient roading network and helps New Zealanders and businesses connect to each other, and to the world.

Paula Rogers
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