Transportation

1.0 Introduction

1.0.1 Since the publication of the Regional Policy Statement in December 2007 there has been a substantial change to the NZ Governments expectations of Land Transport. Government has moved away from "Predict and Provide" mode to an affordable integrated, safe, responsive and sustainable Land Transport System. In delivering the Land Transport System the Government requires a sense of social and environmental responsibility.

1.0.2 To define this new direction a significant number of Strategic Direction Papers have been published along with some new legislation. Government has also significantly restructured its key Land Transport Agencies twice. First in 2004 with the restructure of the Ministry of Transport, Transfund New Zealand and the Land Transport Safety Authority to create a different Ministry of Transport and the Land Transport New Zealand, and now in August 2008 with the restructuring of Transit New Zealand and Land Transport New Zealand to create the New Zealand Transport Agency.

1.0.3 Government has published the NZ Transport Strategy to set the desired direction ahead. It has further set in place a legislative requirement to issue a Government Policy Statement (revised at regular periods) that sets out the short term targets and funding to underpin the longer term goals of the NZ Transport Strategy.

1.1 What are the outcomes now sought by Government

1.1.1 "In August 2008, the Government published its New Zealand Transport Strategy 2008 (NZTS) to set the long term direction for transport to 2040 and provide a greater degree of strategic leadership to the transport sector. The NZTS was informed by relevant parts of the New Zealand Energy Strategy and the New Zealand Energy Efficiency and Conservation Strategy. It also took account of a wide range of feedback received in discussions with stakeholders.

1.1.2 The NZTS sets out the government's vision for transport to 2040 and the strategic approach to be taken.

1.1.3 The vision is that:

'*People and freight in New Zealand have access to an affordable, integrated, safe, responsive and sustainable transport system.*'

1.1.4 The vision is supported by five transport objectives:

- ensuring environmental sustainability,
- assisting economic development,
- assisting safety and personal security,

- improving access and mobility,
- protecting and promoting public health.

1.1.5 The NZTS identifies the following challenges to achieving the 2040 vision:

- responding to climate change,
- energy security and cost,
- investment in infrastructure and services while keeping transport affordable,
- increases in the environmental and social impacts of transport,
- changing demands arising from the ageing of the population,
- how land is developed and the impact this has on demand for transport,
- global terrorism.

1.1.6 The following key trends and issues have been identified as affecting the transport sector:

- Carbon dioxide (CO2) emissions from land transport increased by 64 percent between 1990 and 2006. They are expected to increase a further 30 percent by 2030, if nothing is done to reduce them.
- New Zealand is experiencing significant growth in land transport activity. For example, total annual vehicle kilometres travelled (VKT) have increased approximately 30 percent since 1995.
- New Zealand's population is predicted to grow from 4.2 million today to 5.43 million in 2041.
- Growth in vehicle use for both freight and passenger purposes has been most notable in the triangle formed by Auckland, Hamilton and Tauranga, around 'coastal sunspots' such as Nelson, and in the metropolitan cities where economic and population growth have been concentrated.
- Most transport within New Zealand is now road-based. New Zealand has one of the highest levels of per capita vehicle ownership in the world, with over 700 vehicles per 1000 people.
- The predominant users of roads are people in cars, accounting for about 80 percent of road traffic. Around 90 percent of people travelling to work in cars do so alone.
- Congestion in Auckland can be severe during peak traffic periods and is also occurring outside traditional peak periods. This affects the quality of life for Aucklanders and imposes costs in terms of lost productivity.
- The decline in the number of deaths from road crashes appears to be slowing. Hospitalisations from road crashes have increased in the last few years.
- Public transport use is estimated to have increased by almost 50 percent since 1999/2000. However, the proportion of trips by public transport relative to other forms of transport is low compared with the middle of the twentieth century.
- Transport choices appear to be associated with more sedentary lifestyles to the detriment of people's health and fitness.
- Vehicle emissions in New Zealand have been estimated to contribute to the premature mortality of 500 people annually.

1.1.7 The challenges and trends identified above present a significant risk to achieving the government's vision for transport. The NZTS states that a 'business-as-usual' approach will not be adequate to achieve that vision and sets out seven key components where increased emphasis needs to be applied. These will need to guide how transport is planned and delivered. The seven key components are:

- integrated planning,
- making best use of existing networks and infrastructure,
- investing in critical infrastructure and the transport sector workforce,
- increasing the availability and use of public transport, cycling, walking and other shared and active modes,
- considering options for charging that will generate revenue for investment in transport infrastructure and services,
- using new technologies and fuels,
- maintaining and improving international links.

1.1.8 The NZTS also includes targets to help set the strategic direction for the transport sector and provide a focus for many of the government's actions. In most cases, the targets within the NZTS are expressed in terms of desirable achievement by 2040. The targets address each of the five transport objectives and provide a basis for measuring progress. The key components described above are designed to deliver the targets and vision for transport, in particular by addressing the key challenges." - *This section has been extracted from the new Government Policy Statement published August 2008*

1.1.9 **Target areas and Targets are:**

- ***reducing greenhouse gas emissions***

  Target: reduce kilometres travelled by single occupancy vehicles, in major urban areas on weekdays by 10 % per capita by 2015

- ***freight mode shift***

  Target: increase the mode share of transporting freight by coastal shipping and rail by 2015

- ***travel times and reliability on critical routes***

  Target: no overall deterioration in travel times and reliability on critical routes by 2015

- ***road safety***

  Target: reduce fatalities and hospitalisations from road crashes by 2015

- ***public transport use***

  Target: increase patronage on public transport by 3% per year through to 2015 (this equates to around 23%)

- ***walking and cycling use***

  Target: increase the number of walking and cycling trips by 1% per year through to 2015 (this equates to 7.2%)

1.1.10 Other potential targets:

- Road maintenance
- Accessibility

1.2 How are these targets going to be measured?

1.2.1 The message from the Government is that the Transport system needs to change. The Government is seeking gradual, but accelerating change to give the transport sector, business and individuals time to adapt. **Major changes** are anticipated in order to meet the challenges ahead and small preparatory changes need to be made now.

1.2.2 The first Government Policy Statement (GPS) has set some targets, these GPS targets are National Targets and are the best attempt at this point in time. They will be refined over time as new information and knowledge develop. Currently work is in progress to distil these targets down to regional targets.

2.0 Relevance of Existing Regional Policy Statement and Southland District Plan Issues

2.0.1 One of the purposes of this paper is to assess whether existing issues relating to transport contained in the operative Regional Policy Statement and the Southland District Council District Plan are still relevant to the management of transportation in Southland and whether the objectives, policies and rules that are presently contained in the Regional Policy Statement Southland District Council Plan address the issues appropriately.

2.1 *Regional Policy Statement*

2.1.1 In reviewing the existing Regional Policy Statement it is necessary to recognise that the current community values have evolved from those existing in 1997 when the current Regional Policy Statement was adopted. Since then the New Zealand Transport Strategy was published in 2002 and updated in 2008. Taking all this into consideration, the existing Regional Policy Statement generally addresses the Transportation issues in Southland.

2.1.2 In the existing RPS the following transport issues are relevant and are covered: global warming, managing vehicle emissions, water quality, biodiversity, health, hazardous materials, environment, nuisance, urban design, mode transfer, fuel conservation, interregional issues, cross country water flows and fossil fuel conservation.

2.1.3 While the Objectives and the Methods in the Regional Policy Statement are, in most cases relevant, they are generic and therefore not well defined. As a consequence the aims of the Regional Policy Statement have not been carried into the various District Plans to the extent desirable. This has resulted in an ad-hoc type of development that is not fully reflecting the objectives of the Regional Policy Statement. In other words the outcomes achieved are not a integrated land use/transportation network that minimises the adverse effects on the environment. The generic objectives and methods have also made it just about impossible to implement an effective monitoring regime.

2.1.4 In making these observations it is recognised that in 1997 there was not the information available to well define many of the objectives, policies and methods. Knowledge and best practice of many of the issues included in the 1997 RPS has since increased.

2.1.5 This review provides an opportunity to update these to more closely align with current community expectations and the objectives of the New Zealand Transport Strategy. Areas where the RPS could be strengthened are a more definitive description of the issues (including order of importance), a stronger emphasis on integrated planning and implementation of Travel Demand Management, along with an exact definition of outcomes sought. A key issue is to get the right balance between regulation and good practice so that the region progresses without compromising the environment. By adopting the changes suggested it should be possible to implement a cost effective monitoring plan to measure and achieve the desired outcomes over time.

2.1.6 A detailed analysis of each issues and its objectives, policies is included in Appendix 1.

2.2 *Southland District Council*

2.2.1 Staff at the Southland District Council have provided input into this paper by way of this section. This section provides a Southland District Council perspective on transport infrastructure.

2.2.2 Transport infrastructure is considered to be a physical resource and therefore part of the environment under the Resource Management Act 1991. The Southland District Council is responsible for the administration and maintenance of the District's roading and bridging network (excluding State Highways). The provision of an integrated, safe, responsive and sustainable land transport system is a basic need required to support the economic and social wellbeing of the District's residents. The following resource management issues are identified and listed in the Transportation Section of the existing District Plan. These issues are listed along with discussion on their relevance in terms of the second generation Southland District Plan and transportation options available for inclusion in the new Plan.

2.3 **Southland is dependent on an efficient land transport network to utilise and develop its resources, and to provide mobility and access for its people and communities.**

Explanation

The dispersed nature of Southland's population, its reliance on primary production, and its often rugged topography has led to a high dependence on an efficient land transport system. This system needs to be maintained if Southland is to grow and prosper.

2.3.1 In terms of the second generation Southland District Plan this issue is still considered very relevant. Maintaining the safety and efficiency of key transportation corridors within the District is required to provide for both the economic and social well being of its residents.

2.4 **The Roading Network**

2.4.1 The roading network of the District currently provides the principal form of transport and is likely to continue to do so for the foreseeable future. As such it is considered important that the maintenance and repair of the existing roading network should not be subject to excessive regulatory restrictions under the second generation District Plan. The roading network within the Southland District can be affected by a number of different natural hazards including flooding, landslips, earthquakes, and coastal erosion among others. It is important that when roads or other forms of transport infrastructure such as rail lines are closed as a result of natural hazard events that they are repaired and reopened as quickly as possible. This is especially relevant to roads in remote parts of the District where there may be limited means of access to isolated communities. The importance of a strategic approach towards management of the roading network could be highlighted in this issue. A strategic approach can be used to guide growth and create preferred transportation routes.

2.5 Rail Network

2.5.1 The Southland region historically had an established rail network that provided both passenger and freight services. However with deregulation, the rise of the private motor vehicle, heavy vehicle transport and the development of the roading network, the rail network shrunk and today there are a limited number of rail routes focussed on transportation of industrial goods. In terms of the second generation Southland District Plan it is important the benefits of rail transportation as an alternative form of transportation are recognised along with the other advantages of rail transport. One advantage of the transportation of large amounts of heavy goods via the rail network is that it can prevent damage by heavy goods vehicles on the roading network. Transportation by rail in certain circumstances can be more efficient than transportation via the roading network with less energy being used to transport larger amount of goods.

2.6 Walking & Cycling

2.6.1 While the large size of the Southland District results in a heavy reliance on road transport the existing District Plan does not specifically recognise or encourage other transport methods such as walking and cycling. Distances between townships and the fact that the main road links between towns are along State Highways limits to some extent safe cycling and walking options. There are significant environmental, cost and health advantages associated with walking and cycling and there may be potential for the development of further links between some towns in the District.

2.7 There is a significant increase in land uses generating heavy traffic in the District.

Explanation

The increase in dairy conversions, lime application, gravel extraction and forestry activity in the District is having an impact on the roading resources. Heavy vehicles carrying large loads put a greater strain on roading surfaces, and therefore the cost of roading can be increased dramatically. Forestry could also lead to a greater use of rail transport in the District.

2.7.1 This issue is still considered relevant and the industries mentioned in the explanation are all still generating heavy traffic within the Southland District. Landuse changes within the Southland District since the existing District plan became operative have given rise to a number of specific issues in terms of the transportation network. The explanation of this issue may need to recognise the potential for future development of lignite and oil reserves and other energy resources in the Southland region which could also add to heavy vehicle pressures.

2.8 Rural Landuse change

2.8.1 Increases in the number of farms converting from pastoral to dairy farming has resulted in increased pressure on the District' s road networks particularly rural road networks. The development of these farms during the conversion process requires heavy vehicle haulage of large amounts of gravel to form cow lanes along with heavy vehicle traffic associated with the construction of new milking sheds and other buildings. Once the dairy farm is operating daily milk tanker collections also place additional pressures on the roading network. While dairy farming is a well established industry in the Southland District there has been a significant increase in the number of dairy farms over recent years and the this trend is expected to continue in the near future.

2.9 Financial Contributions/Regulatory Approach

2.9.1 The existing Southland District Plan recognises that development can have adverse effects and place additional pressures on infrastructure and notes that wherever possible these activities should contribute towards the provision of these facilities. Currently the Council under the existing District Plan Rule Fin.1 can impose as a condition of resource consent a condition requiring that a financial contribution be made to council for a number of purposes one of which is the provision and improvement of roading. Subdivision requires resource consent under the current District Plan and as such financial contributions towards the improvement of roading are often obtained when subdivision applications are processed.

2.9.2 Rural activities however are permitted in the Rural Sub Area under the existing District Plan and as such changes from one type of farming activity to another do not require resource consent. As the conversion of pastoral farms to dairy farms does not require a resource consent , financial contributions for the provision and improvement of roading when this landuse change occurs under Rule Fin.1 cannot be obtained.

2.9.3 It is worth noting that there has been criticism of the existing District Plan in terms of addressing the environmental impacts of increasing numbers of dairy farms in the District. This criticism has been concentrated on issues relating to insufficient/weak provisions for the protection of riparian margins along with water quality and quantity concerns. Damage to the District's roading network from dairy farm conversions and the day to day operation of these farms is another issue associated with dairying. This damage can result in significant costs for the District Council and as noted above some of these costs are often avoidable. As the roading network forms part of the physical environment damage to it is a relevant resource management issue.

2.9.4 These effects are not confined to dairying. Forestry activities can also have significant impacts on roading within the District, albeit that these are primarily linked to initial land preparation and harvesting stages and these impacts are somewhat more predictable in advance.

2.10 Rural Residential Growth

2.10.1 Increasing demand for rural/residential 'lifestyle blocks' on the outskirts of towns such as Te Anau, Riverton and Winton has resulted in an increased number of new subdivision applications within the district in recent years. As noted above Under Rule Fin.1 subdivision requires resource consent under the current District Plan and as such financial contributions towards the improvement of roading can be obtained when subdivision applications are processed. Up grading percentages and their relevance in the current plan may require consideration.

2.11 Urban Consolidation/Urban Infill

2.11.1 One problem with continued growth on the fringes of towns is that it can lead to increasing reliance on private motor vehicles. New residential developments on the outskirts of townships tend to increase the area of land that towns cover while at the same time lowering their residential density. Often new residential subdivisions are located further from shopping centres and service areas of towns as well as being situated further from schools and recreational facilities. From a transportation perspective the longer distances between new dwellings built in these subdivisions and town services can lead to an increased reliance on private motor vehicles and increased numbers of vehicle trips. Consolidating residential growth within existing urban areas can reduce peoples reliance on motor vehicles for transportation. Alternative forms of transport such as walking and cycling become more attractive and viable with shorter distances. There is also a need to provide and maintain more roading infrastructure where the urban areas of townships increases and there are significant long term costs associated with this.

2.11.2 There is scope for residential development within existing Urban Resource Area limits in the townships Te Anau, Winton and Riverton. These towns have experienced the highest levels of residential growth over recent years and many of the new residential subdivisions have often been located in the rural areas on the outskirts of these towns. There are a number of empty residential sections and larger areas of land that could be suitable for residential development in the existing urban areas. The second generation District Plan could include policies and rules that look to encourage development of these areas as opposed to sprawling residential development on the rural/urban fringe.

2.12 **Air transport is vital to both Stewart Island and the Milford/Te Anau area, while water transport is vital to Stewart Island.**

Explanation

Stewart Island residents are restricted to two forms of access to and from the Island - air and water. Air transport is also an important component in the tourism trade in the Milford/Te Anau area.

2.12.1 Air transport is an important form of transport particularly in terms of accessing the remoter parts of the District. Stewart Island relies on flight services as one of its main forms of access to the Island. The importance of maintaining two viable forms of transport to the island should perhaps be recognised in the second generation District Plan. Flights to the Island are an important form of transport for both the Island's residents and also its visitors.

2.12.2 Recently the Te Anau and Manapouri airports are being consolidated onto the Manapouri airport site with a new terminal building and airport facilities being constructed, the new airport officially opened in April 2008. This is a modern airport facility in the Te Anau Basin which be well situated to provide for tourists visiting Fiordland, Milford and the Te Anau area.

2.12.3 Water transport via a ferry service is the second form of transport that Stewart Island is dependant on and the importance of the ferry as a vital transportation link to the island should be recognised in the second generation District Plan.

2.13 **The increasing number of tourists visiting Southland imposes an increasing demand to improve and develop transportation links and facilities.**

Explanation

The tourist industry in New Zealand has set a target of an increase of tourists threefold by the year 2000. Southland will continue to be a popular destination. There are currently pressures to develop new links between Queenstown and Milford via the Greenstone Valley and to the West Coast via the Hollyford Valley, and tourist ships are visiting Stewart Island and Fiordland in increasing numbers.

2.13.1 This issue is still considered relevant although a new estimate of the expected number of tourists for the next 5 to 10 years would be appropriate in terms of framing this issue for the second generation Southland District Plan. Several changes have occurred within the Southland District since the current District Plan became operative that may influence the

numbers of tourists visiting the Southland region. One significant change was the establishment in 2002 of the Rakiura National Park on Stewart Island.

2.13.2 Tourist access to Stewart Island is mainly by either ferry services from Bluff or airplane services from Invercargill Airport and these services are run by private companies. From a transportation perspective it is important that these transport services are viable. While Southland and New Zealand has experienced a period of growth in tourist visitors and this may continue it is also important to note that the number of tourists visiting the region may level off or could decrease. The wording of this issue may need to reflect this.

2.13.3 Pressures for new transportation links between Queenstown and Milford via the Greenstone Valley are still present and proposals for new transport links including a bus tunnel proposal and a proposal for an aerial gondola system among others have been advocated at different times, and some of these proposals are still current. The alternative route proposals for Milford if approved and constructed could have significant economic and transportation impacts on the Southland District. Large numbers of tourists currently access Milford from Queenstown via Mossburn and Te Anau and any new alternative link could result in a decrease in the number of tourists travelling through the Southland District.

2.13.4 Other new transportation links outside the Southland District could have an influence on the District. As outlined above a number of proposals for new links to Milford and have been proposed at various times a possible ferry service between Kingston and Frankton has also been proposed. New transportation links such as these may influence both the numbers of tourists visiting the District, the routes they take and the tourist attractions they then visit.

2.14 Cruise ships

2.14.1 There has recently been an increase in the number of cruise ships visiting parts of the Southland District namely Stewart Island and Fiordland. While the cruise ships operate in the Coastal Marine Area which is under the control and management of Environment Southland the large size of some of these vessels and the number of people able to be accommodated on them means that potentially they could have significant environmental effects on these parts of the Southland District. Environment Southland have established a system where by Deeds of Agreement are used to allow cruise ships to visit these areas. In terms of the second generation Southland District Plan it is important the potential environmental impact of cruise ships is recognised.

2.15 **Most forms of transport may give rise to adverse effects.**

Explanation

It is estimated that the transport sector contributes 40% of CO2 emissions in New Zealand. Transportation can also give rise to problems such as noise, vibration, dust, headlight glare, visual intrusion, and discharges, which can impact on environmental amenities.

2.15.1 The adverse environmental effects of transportation are still a relevant resource management issue that the second generation Southland District Plan will need to address. As noted at the start of this paper, Central Government's New Zealand Transport Assessment notes that carbon dioxide (CO2) emissions from land transport increased by 64 percent between 1990 and 2006. They are expected to increase a further 30 percent by 2030, if nothing is done to reduce them. The Southland Districts reliance on the roading network and the resulting high use of motorised vehicles is particularly relevant to this issue. Alternative forms of transportation such as the use of the rail network and cycling and walking can have environmental advantages in terms of reducing CO2 emissions and the other environmental effects. The use of these alternatives is problematic given the size of the District and lower population levels. The new Plan should recognise the importance and role of energy efficiency measures and alternative fuel use in reducing CO2 emissions from transportation.

2.16 **Public Transport**

2.16.1 Development and use of public transport may be one way of reducing the District's CO2 emissions. One of the key components of the New Zealand Transport Authority's vision for transport to 2040 is increasing the availability and use of public transport, cycling, walking and other shared and active modes. The main Issues associated with public transport within the Southland District relate to the District's large size and relatively low population. The low population and the fact that communities are spread over a wide geographic area, has implications in terms of demand for and viability of public transport. There are currently no public transport services within the District although a number of private transport operators provide passenger transport services mainly to and from the larger towns.

2.17 **Land use activities can greatly affect the safe and efficient operation of the transport network.**

Explanation

High traffic generating activities (such as petrol stations), vegetation growing on the side of the road or railway, residential development, to name a few, all have the potential to impact on the safe and efficient

operation of the transport system. Land uses that generate unexpected traffic increases on inadequate roading can lead to poor utilisation of fundings available.

2.17.1 This issue is still considered relevant and as discussed earlier an activity such as dairy farming and forestry could be added to this list. Potential development of the Southland's mineral reserves could also lead to new pressures on the safe and efficient operation of the transport network.

2.18 **Movement of stock along and across roads has been a problem for some time. Specific problems are delays and potential hazard to road traffic and road surface degradation. This activity is and will be controlled by the Stock Droving Bylaw 1993 and any amendment or Bylaw passed in substitution therefore.**

Explanation

Movement of stock along and across roads has been a problem in the District for some time. This activity is controlled by the Stock Droving Bylaw 1993.

2.18.1 Discharges of stock wastes from stock trucks is still an issue for the Southland District and should be included in the second generation District Plan. There are plans to establish effluent dump sites at different points around the District. The establishment of these facilities could be one way of addressing this issue. There is now a 2008 Stock Driving bylaw and this issue will need to be updated in the new plan to reflect this.

2.19 **Construction and upgrading of the transportation network can have effects on natural, cultural, historic and recreational values.**

Explanation

Road construction, and to a lesser extent upgrading, can have effects on the natural, cultural, historic and recreational values in the areas where those activities are carried out. Not all of those effects will be adverse.

2.19.1 As noted earlier in this document it is important that the transportation network of the Southland District is not subject to an excessively regulatory regime. Particularly in regard to situations where repairs are required for existing infrastructure that has been damaged as a result of natural hazards, accidents or other events. It is however important especially in regard to the construction and upgrading of the transportation network that natural, cultural, historic and recreational values are taken into account, recognising Part 2 of the RMA.

3.0 Emerging Transportation Issues in Southland

3.0.1 The key changes affecting transportation include:

- awareness of Global Warming has increased and there is an increased expectation from the community that more should be done to minimise or neutralise day to day activities impact on Global Warming.
- peak oil has again emerged as a concern of the foreseeable future.
- globalisation/ rationalisation of industrial activities has increased, which means raw product is transported over greater distance and longer distribution routes for the finished product. Critical routes are now inter-regional as shipping ports now compete for trade.
- The Government's expectation of how the transportation networks will operate.
- New legislation on how Land Transport will be administered. Amongst this change are new requirements for Regional Transport Committees and Regional Land Transport Strategies.
- The Government has purchased back the rail network and the railway business.

3.0.2 In Southland the most obvious sign of change is the dairying industry and the extensive development of the Edendale dairy factory and the construction of the Dongwha MDF plant south of Mataura.

3.0.3 Further changes include:

- Solid Energy has been buying up farms and has access to 600million tonnes of coal. One use of this could be for manufacture of liquid fuel. Clearly this will be dependent on international oil reserves and prices.
- Awarua Industrial area is being expanded the increase in freight movements, be it rail or road will be dependent on the rate of development.
- The Government has released licences for oil exploration in the Great Southern basin. It has been reported that one consortium will spend over $1billion over the next five years on exploration. Exploration rigs are not expected until 2009 and production from wells is not expected until 2017. At this stage both Port Chalmers and Bluff are competing to service the consortiums.
- Impacts of legislative changes.

3.0.4 In addition to the issues above there are a number of matters that that have the potential to have a significant impact on Southland. These are activities such as the development of

a shorter tourist route between Queenstown and Milford Sound. The traffic loadings on the key highway links will be reduced except for the section of SH94 between the Lower Hollyford Road and Milford Sound. This section of highway presents the biggest safety challenge to the NZ Transport Association. This change is likely to have a significant negative effect on the Southland economy.

3.0.5 If the Haast - Hollyford Highway was to progress, it would have a positive benefit to Southland.

3.0.6 The flow of unprocessed timber into Southland is important to existing processing industries as Southland has a shortage of unprocessed timber while Otago has an excess. Equally important is the flow of containers to northern export ports.

3.0.7 Therefore what matters from the transport perspective is that the transport links that are important to Southland extend into Otago and, at least in terms of data gathering, the development of the Regional Land Transport Strategy for each province should complement each other.

3.1 **Key issues for the future that require address in the reviewed planning documents include:**

- Understanding the impact and requirements of the Government Policy Statement (GPS), and shaping policies and methods to achieve the GPS objectives will be essential. This covers a wide range of key issues: air quality, integrated planning, mode transfer, safety, walking and cycling, public health, accessibility, Traffic Demand Management (TDM) etc.

- Ensuring good Transportation Planning is implemented for the foreseeable future – generally taken as 30 years.

- Improved understanding with respect to the decisions that are made and the impacts these will have in the foreseeable future.

- The direction the Government will take with respect to the rail network.

- A sensitivity analysis of the impacts of the potential developments referred to above.

4. Options to Better Reflect Existing and Emerging Issues

4.1 *Regional Policy Statement*

4.1.1 When considering the issues there is one factor that is common to all transportation issues and that is the change that Government is seeking in the Transport sector. In seeking that change Government is looking for more than recognition of this change, it is looking for proactive implementation. The current objectives, policies and methods do not reflect this new direction, in addition they only loosely define what should be achieved. This makes it virtually impossible to measure progress or undertake meaningful monitoring. There is nothing on encouraging walking and cycling or protection of the key transport corridors (i.e. arterial roads or rail). Efficient movement of freight is vital for Southland's economic wellbeing.

4.1.2 A revised Regional Policy Statement needs to encourage "Best Practice" Transport Planning, including Growth Studies, Urban Design, Travel Demand Management (TDM) and protection of the Arterial Routes etc. These areas of "best practice" need to be supported by measurable policies and methods.

4.1.3 The need for a separate "Southland Regional Strategy" has to be resolved. In time the Regional Land Transport Strategies (RLTS) will need to be reviewed and updated to take into account the new legislation. (LTMA 2003). It is possible that updating the RTLS will require an analysis of commodity flows, modal transfer intentions, TDM opportunities. In this instance it may be an option not to develop a separate Southland Regional Strategy, especially given the legal changes to RLTS's. It should be noted that RLTS must include an assessment of the appropriate role of each land transport mode. Coastal shipping is now included in the "Land Transport Sector" when government defines funding priorities in the new Government Policy Statement, hence it could be expected that this activities will now be included in the next Regional Land Transport Strategy.

4.1.4 The transport issues in the current Regional Policy Statement (RPS) are generally still relevant. In some cases issues could have been identified clearer, and in other instances the intensity of the issue has changed.

4.1.5 Some issues could have been presented differently, for example there is recognition that roads are a physical resource under the RMA and thus should be protected, but there is no recognition of how vital it is to protect the arterial road network. There is no direct recognition of walking and cycling.

4.1.6 The tourist traffic between Queenstown to Milford Sound (via Five Rivers and Mossburn) continues to have a steady growth. The winding nature of the highway, unpredictable weather and spectacular scenery result in a significant number of crashes.

4.1.7 Dairying has continued its high growth with increased maintenance required on local roads due to the servicing of farms and tanker movements. Stock effluent spills onto the roads is becoming a significant nuisance. Fonterra's factory at Edendale is about to enter another expansion phase and there is the recent construction of a milk processing plant South of Invercargill and other major dairy associated expansions in Gore and Invercargill.

4.1.8 Currently coal for Fonterra's plants at Edendale and Clandeboye (near Timaru) is sourced from Southland at a rate of 300,000 tonnes per year. A large part of this will travel by road.

4.2 *Southland District Council*

4.2.1 An efficient roading network remains of great importance to the Southland District Council to ensure secure roading corridors to provide for both economic and social well being of Southlanders and this requires consideration in the revised District Plan.

4.2.2 The existing District Plan does not specifically recognise or encourage other transport methods such as walking and cycling. A combined walking / cycle link between Te Anau and Manapouri is an example of one such possible link. A walking / cycling route could build on existing footpath / tracks along the Te Anau lakefront and Waiau river and would provide an alternative to the existing road linking the two towns. There may be potential for development of walking/cycling links like this in a number of different areas of the Southland District. While there may not currently be any detailed plans for such links the second generation District Plan should recognise the advantages of walking and cycling and encourage transport infrastructure that provides for these modes of transport. Furthermore alternative forms of transportation such as the use of the rail network and cycling and walking can have environmental advantages in terms of reducing CO2 emissions and the other environmental effects. The new Plan should recognise the importance and role of energy efficiency measures and alternative fuel use in reducing CO2 emissions from transportation.

4.2.3 The Te Araroa Trust project is an example of a national initiative to develop walking links within New Zealand. The second generation Southland District Plan could recognise the development of Te Araroa which will be a continuous 3,000 km walking track from Cape Reinga to Bluff. Part of the walk will run through the Southland District and the development of Te Araroa into a transportation link and attraction will have social and economic benefits for the District. The walkway as well as providing a walking track along

the length of the country will also provide for shorter walks. The scheduled completion date for the walkway is 2010.

4.2.4 Development should be encouraged to consolidate existing settlements within existing urban boundaries where possible, to minimise travel demand and maximise viability of alternative transport options. New residential development on the fringes of existing towns should be designed to allow for and encourage walking and cycling and should link into existing footpath networks of townships where ever possible. Over recent years there has been significant residential development pressure on areas located on the fringe of the existing urban resource areas of towns such as Te Anau, Riverton and Winton. These developments wherever possible, should link in to the existing footpath and cycleway network of the town. Residential 'lifestyle block' developments located on State Highways can be reliant on motor vehicles as their only form of access and wherever feasible alternative cycling and walking links should form part of subdivision design.

4.2.5 The possibility and advantages of establishing recreational cycling and walking opportunities could also be recognised in the second generation District Plan. The Southland District may facilitate recreational cycle and mountain biking trails similar to those that have been developed in other Districts of New Zealand for example the Central Otago Rail Trail. The development of the Hump Ridge Track is another example and one that was developed within the Southland District.

4.2.6 Increased use of the region' s rail network in the future, particularly by larger industries should be encouraged where existing routes can be utilised. By way of example trainloads of up to 550 tonnes of thermal coal at a time have recently started being transported by rail from the Takitimu Mine at Nightcaps bound for Fonterra's Clandeboye dairy plant north of Temuka. This will equate to a significant reduction in the number of heavy vehicles transporting coal through the Southland District. There is potential in the future for increased use of the rail network by industries located within the District.

4.2.7 Currently due to a small and dispersed population there is limited scope or need for use of rail in the Southland District for passenger transport. However there have been some community-initiated moves to seek to reinstate some former passenger rail routes such as the Southerner. The protection of the rail network as a key transport corridor and alternative to the road network should be identified in the second generation Southland District Plan.

4.2.8 Landuse changes continue to have a significant impact on roading and transport networks. When dairy farm conversions take place, damage to roads often arises. Many roads have not been designed to cope with the number of heavy vehicle movements that are required

both during the conversion of the farm itself and also afterwards with the day to day operation of the dairy farm. Farms in pastoral production generally do not have such high numbers of heavy vehicle movements and as such the existing roads have not been designed for intensive heavy vehicle use. As dairy farming has spread to areas of the District it has not previously occurred in and the numbers of dairy farms has increased, the pressure on roading infrastructure has also increased. This has resulted in significant damage to rural roads which in many cases could have been avoided. From a road maintenance perspective it is significantly more cost effective for the District Council to upgrade roads before they are subject to heavy traffic usage rather than repairing damage that has already been done. If the Council is aware of the roads new dairy farms will be using they can make more cost effective road maintenance and upgrading decisions. Currently there is no formal process through which the District Council in informed well in advance of where new dairy conversions are occurring.

4.2.9 There are also a significant number of forestry blocks in the Southland District that are due to be harvested in the near future. The harvesting of private and corporate forestry blocks can also result in significant damage to the Districts roads. If the Council is aware of where and when forestry block harvesting is coming on stream road maintenance and upgrading decisions that may limit potential damage to roads can be made.

4.2.10 In terms of avoiding, remedying and mitigating adverse effects on the roading network there are a number of options that could be incorporated into second generation Southland District Plan. A change to the existing permissive approach to landuse change to require land use consent to be obtained where conversion of farmland from pastoral farming to dairying is proposed may be a consideration.

4.2.11 This would provide a mechanism for conditions to be imposed relating to the roading network such as financial contributions for the provision and improvement of roading as well as a mechanism for dealing with some of the other environmental impacts of dairying. If such landuse change was not permitted in terms of the second generation District Plan its listing as a controlled activity could be one option. The Council is required to grant resource consent for controlled activities subject to conditions over matters referred to in the District Plan rules. The impact on the roading network of new dairy farms both at the time of farm conversion and then during the day to day operation of the farm could be matters referred to in the District Plan.

4.2.12 One option in terms of the second generation Southland District Plan could be to modify non-regulatory approaches. The existing District Plan notes that the purpose of the Rural Resource Area is to provide a flexible framework that allows rural activities to continue while ensuring that they do not adversely affect the physical and natural resources upon

which they rely. In terms of landuse change the Council could maintain the existing non-regulatory approach to the Rural Resource Area. Non-regulatory approaches such as economic incentives and education programmes could be adopted.

4.2.13 In response to the continued growth in dairy farming in the Southland District the District Council has put together Dairy Conversion Packs which are an information resource. The purpose of the packs is to provide all the relevant District Council information relating to the different approvals that are normally required when a dairy conversion occurs. The approvals that may be needed that are covered in the packs include building consents for new buildings, resource consents for gravel/rock extraction and new dwellings and roading approvals for new and improved vehicular accesses on to Council roads and the construction of stock underpasses.

4.2.14 While Council approval is required for new vehicular accesses onto Council roads, some rural properties that have been converted to dairy farms use existing vehicular accesses and as such may start operating without access upgrading work occurring. The use of non-regulatory means also means that the District Council cannot influence which roads or routes dairy tankers take between the farm and dairy factory. The use of roads that are not suitable can result in significant damage and costs as noted earlier.

4.2.15 Increasing demand for rural/residential 'lifestyle blocks' on the outskirts of towns such as Te Anau, Riverton and Winton has resulted in an increased number of new subdivision applications within the district in recent years. Financial contributions towards the improvement of roading can be obtained when subdivision applications are processed and are limited to a maximum of 50% of the upgrade costs. The Council's Roading Department have indicated that this percentage may need to be increased enabling the Council to address some roading issues when they arise in the subdivision process.

4.2.16 New residential developments on the outskirts of townships tend to increase the area of land that towns cover while at the same time lowering their residential density. Consolidating residential growth within existing urban areas can reduce peoples reliance on motor vehicles for transportation. Alternative forms of transport such as walking and cycling become more attractive and viable with shorter distances. The second generation District Plan could include policies and rules that look to encourage development of areas as opposed to sprawling residential development on the rural/urban fringe.

4.2.17 Retention of accessible air and ferry transport to remoter parts of the district particularly Stewart Island and Fiordland is important for both residents and tourists. The second generation plan should therefore recognise for the maintenance and viability of these forms of transports. In addition the increase in the number of cruise ships visiting the

district and the impacts of large tourist numbers on infrastructure and accommodation facilities requires recognition given the potential environmental effects that this could have on parts of the district.

4.2.18 Development and use of public transport may be one way of reducing the District's CO2 emissions. The main Issues associated with public transport within the Southland District relate to the District's large size and relatively low population. There are currently no public transport services within the District although a number of private transport operators provide passenger transport services mainly to and from the larger towns.

4.2.19 One issue associated with existing private transport network is the relatively expensive cost of this type of travel. One option may be the introduction of a subsidised service for some private passenger transportation routes. This may be one way of encouraging public use of these existing private transport services, and providing a service for people without access to private motor vehicles. Demand for a subsidised private passenger service may be higher among certain members of the public who may not have a private motor vehicle, such as younger people and the elderly. Making greater use of existing private transport networks through a subsidy scheme may be a cost effective measure that could be implemented relatively easily. Public transport systems similar to those that operate in larger urban areas are not likely to be viable in a predominantly rural district.

4.2.20 Alternative routes between Queenstown and Milford Sound is still a high profile issue with around six alternatives in various stages of planning. All will have an impact on the Queenstown to Divide section of this key tourist route. The Haast- Hollyford Road proposal will have transportation and economic effects over a greater area. It is worth noting that the Westland Regional Transport Strategy includes provision of $100,000.00 for investigations of this route. The Milford Dart proposal could have significant economic impact on Southland.

4.2.21 Sourcing quality roading aggregates is still a potential issue. A Study by Environment Southland in 1996 set down a Code of Practice for the sustainable management of river gravel resources in Southland. Since this study is now over 10 years ago it is probably time to revisit this matter to ensure that the Code of Practice has achieved a sustainable regime.

4.2.22 The current rules appear adequate to deal with tourist ships visiting and with the development of the fishing industry at Milford Sound.

4.2.23 Monitoring to ensure the Regional Policy Statement objectives are met is a key activity. For monitoring to be effective there is a need to know what should be achieved. Decisions with respect to the level of monitoring needed to determine how effective the policies are at achieving the objectives will be required.

4.2.24 The implementation of the new direction for Transport as expected by Government will require revision of existing policies, i.e. understanding what is the required outcome and shaping policies to achieve that.

4.2.25 Consideration with respect to the inclusion of policies within a revised Regional Policy Statement will be required to ensure that the efficiency of the Arterial Network is maintained.

4.2.26 Furthermore consideration will be needed with respect to the setting of standards or development of guidelines that will help to better define the objectives and outcomes desired, e.g. noise, vibration etc. This will aid and ensure good long term transportation planning out comes, e.g. adoption of "best practice".

5.0 Questions For Further Discussion

5.1 *Regional Policy Statement*

1. Are the policies within the existing transport policies under 5.11 in the Regional Policy Statement definitive enough?
2. Should the Regional Policy Statement specify or direct readers to the current best practice?
3. What does the community want from its transport network now, and in 30 years?
4. When we know what the community wants, how will it be defined and measured?
5. Are all the issues around sea and air transport adequately defined?

5.2 *Southland District Plan*

1. Currently rural landuse change from pastoral farming to dairying is placing significant pressure on roading infrastructure. Should a regulatory approach to rural landuse change be adopted to ensure that these landuse activities contribute financially towards roading infrastructure?
2. Should there be more of a focus on encouraging the use and development of alternative modes of transport from the roading network such as rail, cycling and walking?
3. Is the provision of public transport services something that the Southland District Council should examine further?

4. Is there demand for public transport services and what transportation options would be viable, cost effective and realistic?

5. Would the development of a subsidy scheme for use of existing transport services currently provided by private transport operators be appropriate?

6. Should more be done to encourage infill development in existing towns rather than ongoing sprawl, so as to reduce travel demands?

6.0 Relevant Documents

6.1 *Legislation*

- Land Transport Amendment Act 2008
- Government Policy Statement Aug 2008
- Land Transport Amendment Act 2003 (this may be superseded by the 2003 Act)

6.2 *Strategic Direction*

- NZ Transport Strategy 2008 – MOT
- NZ Energy Strategy 2007 –Ministry of Economic Development
- NZ Energy Efficiency and Conservation Strategy 2007 – Energy Efficiency and Conservation Authority Oct 07
- Sea Change – NZ Sea Freight Strategy Strategy 2008 – Ministry Of Transport
- National Rail Strategy to 2015 – Not sure how the recent purchase of the Rail Business will affect this strategy
- NZ Freight Strategy - being developed
- Road Safety Strategy to 2010 – Oct 2003 – Ministry Of Transport
- The Accessible Journey – report by the enquiry into Accessible Public Land Transport 2005.
- National Urban Design Protocol

Appendix 1: Analysis of Existing Regional Policy Statement Issues

1.1 **Issue 1:**

1.1.2 All forms of transportation can give rise to adverse effects, for example:

- Emissions from engines increase carbon dioxide and other green house gases into the atmosphere. It is estimated that 40% of carbon dioxide comes from the transportation sector. *(Global Warming)*
- Waste from animals being carried on stock trucks causes nuisance to other road users when disposed on the road, and lowers the water quality in the vicinity. (*Nuisance/Water Quality)*
- Waste from the practice of washing down trucks lowers water quality in the vicinity. (*Water Quality)*
- Spills occurring during transit as a result of insecure loads and accidents, either on land or at sea, can give rise to nuisance and in some instances can be a risk to animal and plant life. (*Water quality, Nuisance, Biodiversity)*
- Discharges from boats both at sea and on lakes and rivers, can lower water quality, make water appear unattractive, introduce new unwanted organisms into the area and create a risk in some cases to animal and plant life. (*Water Quality/Nuisance/Biodiversity – note similarity with bullet point immediately above)*
- Sprays used to reduce and manage weed growth along road and rail margins can contaminate adjacent land and nearby waterways. (*Water Quality/Hazardous Materials)*
- Dust from, and oil spread on, rural roads can give rise to nuisance and affect water quality. (*Water Quality/Nuisance/Hazardous Material)*
- High volumes of traffic, particularly within urban areas, can give rise to problems from noise, vibration, headlight glare, smells and visual intrusion, which can impact upon amenities. (*Nuisance/Health)*
- Noise nuisance can arise from operational port areas and rail operations, particularly when loading is undertaken at night; and aircraft passing over urban areas, for example en route to or leaving airports, and flying over scenic and natural areas impacting upon their character. (*Nuisance /Health)*
- Large vehicle on main roads, particularly where they pass through populated areas, cause noise, smell and vibration. (*Nuisance /Health – note similarity with bullet point two up)*
- Inorganic matter and heavy metal contaminants from road vehicles leave deposits on roadways that can cause a danger to and affect water quality in nearby waterways. (*Water Quality/Hazardous Material)*

- Hazardous substances carried by land, sea and air pose a risk to people and the environment. (*Hazardous Material/Health)*
- Damage to, or removal of remnants of native vegetation as a consequence of road building and maintenance. (*Environment)*

1.1.3 Comment:

(a) The above issue is still relevant but it is not complete. It covers many factors (Note Italic annotations above) that can result in some parts of the issue not being given due weight and may be better split into several issues.

(b) This issue covers air, water, soil, hazardous substances, coastal, nuisance (noise, vibration, spillage), pollution, biodiversity etc. Heritage and archaeological are not covered as an issue, but are picked up under the policies (8.5).

(c) What it does not cover, and is not covered elsewhere is: maintenance of infrastructure (bridges, culverts, retaining walls, dumping/winning materials etc), natural hazards (rock falls, avalanches), taking global warming into account etc

1.2 **Objectives – Issue 1**

Objective 5.1. to sustain the Region's water resources so as to:
a) Meet the needs of a range of uses, including the reasonably foreseeable needs of future generations
b) Safeguard the life supporting capacity of water related ecosystems.
Objective 5.2: To ensure that in the use and the development of water and land resources, and the discharge of contaminants, water quality is maintained and wherever practical enhanced.
Objective 5.3: to ensure the taking, use, damming diversion of the water and the discharge of contaminants into the water does not compromise water quality standards established for the region.
Objective 8.2: To avoid, whenever practicable, adverse effects arising from sedimentation and nutrient runoff from land into water bodies.

1.2.1 Comment:
All directly applicable to road, rail and air operations for construction, maintenance and operations of their respective infrastructure.

1.3 *Objective 10.1: To achieve the sustainable management of the built environment in such a way that the needs of future generations are met.*

1.3.1 Comment:
Directly relevant, but generic

1.4 *Objective 11.1: to minimise the adverse effects of transportation modes and infrastructure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*

1.4.1 Comment:
The intent of this objective is appropriate, however it is too generic, because it covers such a range of effects, to be effective. The present intent of Government is to closely focus on reducing greenhouse gases arising from transport. It is now appropriate that there is an objective that specifically addresses this issue that, in turn, will allow the development of policy and methods to target the reduction of greenhouse gases from transportation. For example methods requiring the implementation of Travel Demand Management, integrated planning, walking, cycling and passenger transport infrastructure etc.

1.5 *Objective 11.2: To minimise the adverse effects on the region's transportation infrastructures, so that these physical resources are managed in such a way that they are able to meet the needs of future generations.*

1.5.1 Comment:
Directly relevant though very generic and makes no distinction between minor roads and arterial roads.

1.6 *Objective 12.2: To protect the life supporting capacity of the global atmosphere.*

1.6.1 Comment:
Directly relevant, again to generic (Note comments for 11.1 above). The key aspect raised in the issue statement is "emissions from engines" and this objective could be strengthened by making reference to reducing greenhouse gas emissions.

1.7 *Objective 17.1: to safeguard the environment from the adverse effects from existing and past storage, use, disposal or transportation of hazardous substances.*

1.7.1 Comment:
Directly applicable, storage, use and transportation of hazardous substances are part and parcel of moving freight and maintenance of infrastructure.

1.8 *Objective 18.1: To establish and maintain effective processes to deal with cross-boundary issues.*

1.8.1 Comment:
Directly relevant; although locally agreed solutions are ideal, transportation is a national activity and it is vital that a consistent approach nationally, where practical and possible, is taken across all regions because freight can travel to ports further a field than the neighbouring region. This will become more common as sea transport hubing continues.

1.9 **Other Objectives that may be Appropriate for Issue 1**

1.9.1 *Objective 10.2:*
To maintain and enhance the environmental quality of the regions built environment.

1.9.1.1 Comment:
Applicable for the reduction of greenhouse gases from transportation.

1.9.2 *Objective 10.3: To protect heritage values and archaeological sites of regional significance.*

1.9.2.1 Comment:
This complements the last bullet point of issue 1.

1.9.3 *Objective 12.1: To protect the region's air quality, and enhance air quality in areas that it has been degraded.*

1.9.3.1 Comment:
In some areas of NZ there are areas where air quality is substandard due to vehicle use. This should be considered as to whether this is applicable in a Regional Policy Statement for Southland.

1.10 **Policies – Issue 1**

1.10.1 *Policy 2.4: Avoid, wherever practical, remedy or mitigate adverse impacts on biodiversity and the natural processes of ecosystems.*

1.10.1.1 Comment:
Directly relevant but the issue for transportation is to not contaminate the water.

1.10.2 a *Policy 5.3: Prepare Regional Plan(s) for the management of water quality considering point and non-point source discharges.*

b *Policy 5.7: Encourage and, where practical, require marine and freshwater vessels to dispose of sewage into a shore based sewage treatment/disposal system.*

c *Policy 5.9: Discourage, and where practical prohibit the discharge and bio-accumulative contaminants into water.*

d *Policy 8.1: Maintain and enhance Southland's soil resource by avoiding, remedying or mitigating the adverse effects of activities.*

e *Policy 8.5: To avoid, remedy or mitigate any adverse effects of the use or development of land on wahitapu. Ahi taoka and archaeological sites.*

1.10.2.1 Comment:
All directly relevant.

1.10.3 *Policy 10.1: Encourage development and use of the built environment that provides for the efficient use of existing facilities and infrastructure while simultaneously avoiding the development of unnecessary additional infrastructure.*

1.10.3.1 Comment:
Directly relevant. It is considered that this policy should be expanded to give more direction to what is required and this should be implemented through the methods. Wording could include 'development should follow best practice of integrated planning, urban design and Travel Demand Management'.

1.10.4 *Policy 11.3: Require statutory resource management documents to include provisions that avoid, remedy or mitigate the adverse effects on the Region's transportation infrastructures, so that these physical resources can be managed in such a way that they are able to meet the needs of future generations.*

1.10.4.1 Comment:

(a) Directly relevant.

(b) Policies 11.2 and 11.3 are essentially the same policy, they both provide for the continuance etc of transportation infrastructure. I believe that they could be combined without weakening the protections sought. I also believe the methods are compatible.

1.10.5 *Policy 11.4: Require district and regional plans to included provisions that avoid, remedy or mitigate the adverse effects of transportation and transportation infrastructure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*

1.10.5.1 Comment:
Directly relevant.

1.10.6 *Policy 11.7: Minimise the adverse impacts upon natural resources, in particular water quality, by road and railway maintenance activities including:*
i Managing the use of oil as a dust suppressant on unsealed roads;
ii Managing drainage ditch construction and maintenance; and
iii Managing spraying of verge vegetation

1.10.6.1 Comment:
This policy is directly relevant as far as it goes. Oil is not the only dust suppression product available. Verge is not a clear definition. It is assumed that this would include both the road shoulder and the drainage water tables. There is no performance parameters for any of what is trying to be achieved.

1.10.7 *Policy 11.8: Minimise the adverse effects of waste discharges on water quality from vehicles carrying stock or passengers, campervans and vehicle washing facilities on water quality.*

1.10.7.1 Comment: This is directly relevant. However needs a minor edit:- delete " on water quality" from the end of the policy –repetition.

1.10.8 *Policy 11.9: Minimise the effects of the movement of livestock on public roads.*

1.10.8.1 Comment:
This policy applies principally to droving. While an appropriate policy, droving of stock is not listed as an issue under issue 1.

1.10.9 *Policy 12.2: To protect the life supporting capacity of the global atmosphere.*

1.10.9.1 Comment:
Directly relevant to the control of vehicle emissions. However the policy could give clearer direction to what is required, which is the reduction of emissions.

1.10.10 *Policy 13.7: Ensure that reasonable noise levels are not exceeded with in the coastal environment.*

1.10.10.1 Comment:
This policy is relevant to a pleasant environment but, again noise in the coastal environment is not raised as an issue.

1.10.11 *Policy 13.13: Promote the adoption of systems for the discharge of wastes and contaminants which have the least adverse effects.*

1.10.11.1 Comment:
The intent of this policy is relevant. The policy could be stronger by changing the term 'promote'. The qualifier "---which have the least adverse effects" does not meet the community's expectations for the control of adverse effects.

1.10.12 *Policy 13.16: Advocate Government to take action to avoid adverse effects from ships discharging ballast, bunkerage, and other material within the waters of the region.*

1.10.12.1 Comment:
Directly relevant

1.10.13 *Policy 17.4: Encourage the reduction in the use of hazardous substances.*

1.10.13.1 Comment:
Directly relevant, in that reduction in use is likely to reduce risk. The more effective policy is 17.5.

1.10.14 *Policy 17.5: minimise the adverse effects on the environment from the storage, use, discharge, transportation and disposal of hazardous substances.*

1.10.14.1 Comment:
Directly relevant, but this policy does not recognise that in reality there will always be a need to transport hazardous substances. Therefore to control/minimise or eliminate the risk of an adverse event there should be a policy that targets the adoption of best practice for the transport of hazardous goods.

1.11 Issue 1: Methods

1.11.1 *Method 11.1: Information, education, and public awareness.*
Provision of advice and information can be directed at raising the public awareness or, to specific activities, in order to minimise environmental effects. This can include the consideration of:

- *The adverse impacts upon natural resources of road and rail construction and maintenance activities*
- *The adverse effects of uncontrolled waste discharges on water quality from vehicles carrying stock, and campervans*
- *The adverse effects that washing down vehicles in inappropriate areas on water quality*
- *The adverse effects that the movement of livestock can cause*
- *The adverse effects of the activities on the transportation network.*

1.11.1.1 Comment:

(a) Directly relevant , but, if possible, should also be linked to some form of enforcement.

(b) While promotion is a valid tool, it does not recognise that transport infrastructure is a physical resource and has significant economical and social benefits to a community.

1.11.2 *Methods 11.2: Promotion.*

Promotion of alternative, more efficient, transportation modes or more fuel efficient use, including fuel types and measures such as lowering the speed limit to reduce fuel use, can result in conservation of resources and, ultimately, sustainability of transport.

1.11.2.1 Comment:

This method is a mixed bag that is incomplete. A more appropriate promotion would be to promote fully integrated transport solutions including Travel Demand Management and urban design. Lowering speed limits is counter to maintaining efficiency. Government has assessed what is a reasonable balance between safety, efficiency and fuel use when setting speed limits.

1.11.3 *Method 11.3: Advocating.*

Advocate to Government the need to recognise that the regional contribution of Southland to Nation's economy, and as a vital link in tourism, depends on a well maintained and safe transportation network, which requires appropriate Government funding to operate efficiently and effectively.

1.11.3.1 Comment:

Directly relevant once an issue has been identified and evaluated. The likely nationally significant transportation issues in Southland are use of rail, use of coastal shipping and the Homer Tunnel section of SH94.

1.11.4 *Method 11.4: Developing guidelines for resource users.*

Guidelines can be developed. For example, gravel extraction and spraying of the verge vegetation, in order to minimise adverse effects.

1.11.4.1 Comment:

Development of guidelines is practical and useful, but to be effective it needs a champion in the region for each specific guideline. Furthermore it also needs to be linked to other statutory documents such as the Pest Management Strategy.

1.11.5 *Method 11.5: Protocols and Accords.*

Protocols can be developed between local authorities for responding to cross-boundary issues. Accords will be necessary in dealing with various activities, for example, aircraft movement into and out of airports, or with the shipping industry for the adoption of voluntary practices relating to the activities of ships passing through the regions waters.

1.11.5.1 Comment:

The protocols section is directly relevant, but only a minor part of this issue. Accords are not relevant. Accords may not be an effective tool if used after the infrastructure has been put in place.

1.11.6 *Method 11.6: Strategies. Strategies can be prepared setting out a regional perspective on such matters as a Regional Transportation Strategy. While not having a formal status under the Resource Management Act such documents could be used as a means of obtaining agreement between different organisations as to appropriate approaches to issues within the Region. Consultation will be required in preparing any strategies.*

1.11.6.1 Comment:

Directly relevant.

1.11.7 *Method 11.7: Prepare, Implement and Administer Regional and District Plan*

In preparing Regional and District Plans, there will be a need to co-ordinate land use , transportation provisions and transportation infrastructure, and include provisions relating to:

- *Activities near transportation routes*
- *Protection of transportation networks*
- *Standards relating to effects of transportation modes, including noise, vibration, glare, pollutants into waterways etc*
- *Standards relating to the effects of large scale transportation modes, including transportation yards, airports, railways yards, and sea ports*
- *Patterns of development that enable people to minimise their transportation needs.*

1.11.7.1 Comment:

Directly relevant. This is an effective process. But first need to start from first principles:- Integrated planning - a transportation network services the community/land use and cannot be implemented as an add-on.

1.11.8 *Method 11.8: Plans, other documents, and action under other Acts.*

Action undertaken under other legislation, for example, the Regional Land Transport Strategy prepared under the Transit New Zealand Act, shall consider and have regard to the potential environmental effects of existing and proposed activities. Activities requiring consideration under other Acts will include:

- *Disposal of waste from vehicles*
- *Noise of road and air transport*
- *Movement of hazardous substances*
- *Movement of stock on roads*

1.11.8.1 Comment:
Directly relevant.

1.11.9 *Method 11.9: Resource Consents and Public Works. In the preparation and consideration of resource consents and public works, those that concern transportation shall consider effects on natural and physical resources, for example, the potential effect on flooding caused by changes to the vertical and horizontal alignment to roads and railways. Resource consents and public works not directly related to transportation shall consider their effect on transportation, where appropriate.*

1.11.9.1 Comment:
Directly relevant. Presume public works means designation so may be a change of title.

1.11.10 *Method 11.10: Economic Instruments. Economic instruments can be used to provide incentives for modes of transport which have lower adverse effects on the environment.*

1.11.10.1 Comment:
Directly relevant, but limited.

1.11.11 *Method 11.11: Works and Services. By the provision of works and services, territorial authorities can achieve a more effective transportation network and minimise environmental effects, for example, by the building of heavy traffic bypass routes.*

1.11.11.1 Comment:
This is relevant for specific solutions only and is very costly. Far better to start from a growth strategy, define arterial network and vigorously protect it.

1.11.12 *Method 11.12: Consultation. Consultation can be used to ensure the views of interest groups and the public taken into account in preparing documents and prior to making decisions on non-statutory matters.*

1.11.12.1 Comment:

(a) Directly relevant.

(b) The methods need to identify activities for an efficient and effective transportation system – that is integrated planning. Transport is not a separate process, it is part of a whole. There should be reference to growth planning and environmentally and socially responsible systems to support the current needs and future growth. Implementing planning in a structured way ensures that all issues are balanced against each other, not in direct confrontation.

1.12 **ISSUE 2:**

The structure and shape of urban areas, whether compact or ribbon determines the degree of accessibility to the central area and to places of work and commerce. Where the central area is accessible, or where there is an efficient and affordable public transportation sector, then the need for public car parking areas within the central area is significantly reduced.

1.12.1 Comment:

This issue appears disjointed. While the first part of the statement is correct, it appears to be starting from the finished product. The second part of the issues discuss passenger transport. Central accessibility does not reduce parking needs, good passenger transport does. The outcome to achieve an integrated urban area is determined by good design and having objectives that deliver good design along with the vision to plan for the future. Most of the Government Policy Statement is structured to correct past mistakes and move existing transport networks to a future sustainable network. Consideration should be given to rewriting this issue to clearly define what the real issue is.

1.13 **Objectives – Issue 2**

1.13.1 *Objective 10.1: To achieve the sustainable management of the built environment in such a way that the needs of future generations are met.*

1.13.1.1 Comment:

Directly relevant to the intent of issue 2.

1.13.2 *Objective 11.3: Require statutory resource management documents to include provisions to avoid, remedy or mitigate the adverse effects on the on the Region's transportation infrastructures, so that these physical resources can be managed in a way that they are able to meet the needs of future generations.*

1.13.2.1 Comment:
Directly relevant, but could be strengthened to ask for best practice transport planning.

1.14 **Policies – Issue 2**

1.14.1 *Policy 10.1: Encourage development and use of the built environment that provides for the efficient use of existing facilities and infrastructure while simultaneously avoiding the development of additional infrastructure.*

1.14.1 Comment:
Directly relevant but it does not go far enough. The efficient use of existing infrastructure is good, however the policy should be asking for integrated development where developments and transportation networks are developed together.

1.15 **Methods – Issue 2**

1.15.1 *Method 11.1: Information, education, and public awareness. Provision of advice and information can be directed at raising the public awareness or, to specific activities, in order to minimise environmental effects. This can include the consideration of:*

- *The adverse impacts upon natural resources of road and rail construction and maintenance activities*
- *The adverse effects of uncontrolled waste discharges on water quality from vehicles carrying stock, and campervans*
- *The adverse effects that washing down vehicles in inappropriate areas on water quality*
- *The adverse effects that the movement of livestock can cause*
- *The adverse effects of the activities on the transportation network.*

1.15.1.1 Comment:
While promotion is a valid tool, the content of this list above is incomplete. It does not recognise that transport infrastructure is a physical resource and has significant economical and social benefits to a community, and for this issue a key target is the professional people who write the statutory resource management documents. Consideration should be given to amending this objective.

1.15.2 *Methods 11.2: Promotion. Promotion of alternative, more efficient, transportation modes or more fuel efficient use, including fuel types and measures such as lowering the speed limit to reduce fuel use, can result in conservation of resources and, ultimately, sustainability of transport.*

1.15.2.1 Comment:
This method is considered incomplete for this issue. A more appropriate promotion would be to promote fully integrated transport solutions including travel demand management and urban design.

1.15.3 *Method 11.3: Advocating. Advocate to Government the need to recognise that the regional contribution of Southland to Nation's economy, and as a vital link in tourism, depends on a well maintained and safe transportation network, which requires appropriate Government funding to operate efficiently and effectively.*

1.15.3.1 Comment:
Directly relevant once an issue has been clearly defined and evaluated. The likely nationally significant transportation issues in Southland are use of rail, use of coastal shipping and the Homer Tunnel section of SH94.

1.15.4 *Method 11.7: Prepare, Implement and Administer Regional and District Plans In preparing Regional and District Plans, there will be a need to co-ordinate land use , transportation provisions and transportation infrastructure, and include provisions relating to:*

- *Activities near transportation routes*
- *Protection of transportation networks*
- *Standards relating to effects of transportation modes, including noise, vibration, glare, pollutants into waterways etc*
- *Standards relating to the effects of large scale transportation modes, including transportation yards, airports, railways yards, and sea ports*
- *Patterns of development that enable people to minimise their transportation needs.*

1.15.4.1 Comment:
Directly relevant. Start from the beginning with a proposed growth strategy, a transport network to service that growth, including compatible development adjacent to the least desirable areas.

1.16 **Issue 3**

1.16.1 The structure and efficiency of the transportation network has implications on the management of the network. For example:

- An inefficient network has social and economic implications
- Increases in the number of large vehicles on the road impacts on other road users
- Rail may provide an alternative means of moving bulk products

- The location of new major airport facilities will attract other tourist related services.

1.16.2 Comment:

(a) It is not clear what is the concern raised by this issue.

(b) If the issue is to support the need for an efficient network it needs to be rewritten to be clearer on this matter. The existing transport network needs to be protected to maintain current efficiencies and improved in some locations. This need to protect and maintain transport efficiencies of the network is vital if the transport networks are to be able to deliver the economic benefits to the region. Poor decisions on land use have had significant adverse effect on the efficiency of the arterial roading network. Compromised efficiency means added costs on the transportation of goods and freight. Proper design means both good transportation networks and communities can live together in harmony, otherwise factors like Issue 7 emerge where the operation of transport infrastructure is being asked to compromise its operations to enable a community to occupy airport operational zones.

1.17 **Objectives – Issue 3**

1.17.1 <u>*Objective 11.1:*</u> *to minimise the adverse effects of transportation modes and infrastructure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*

1.17.1.1 Comment:

Not directly applicable to this issue. This issues is about protecting the transport infrastructure.

1.17.2 <u>*Objective 11.2:*</u> *To minimise the adverse effects on the region's transportation infrastructures, so that these physical resources are managed in such a way that they are able to meet the needs of future generations.*

1.17.2.1 Comment:

Directly relevant, also refer to objective 11.3 below.

1.17.3 <u>*Objective 11.3:*</u> *Require statutory resource management documents to include provisions to avoid, remedy or mitigate the adverse effects on the on the Region's transportation infrastructures, so that these physical resources can be managed in a way that they are able to meet the needs of future generations.*

1.18 **Policies – Issues 3**

1.18.1 *Policy 11.1: Prepare a Southland Transportation Strategy that-*

a Identifies the environmental issues arising from the operation from the various modes of transportation in the region.

b Provides a framework for the future development and management of the transportation network in the region

c Identifies the means of implementing the strategy.

1.18.1.1 Comment:
The Regional Land Transport Strategy under the amended Land Transport Management Act 2003 extends the area of interest to include both rail and coastal shipping therefore this policy needs review to take that into account.

1.18.2 a *Policy 11.2: Provide for the continuance, maintenance and enhancement of the existing facilities and infrastructure associated with the operation of ports, while avoiding wherever practicable, or remedying or mitigating, any adverse effects on the environment.*

b *Policy 11.3: Require statutory resource management documents to include provisions that avoid, remedy or mitigate the adverse effects on the Region's transportation infrastructures, so that these physical resources can be managed in such a way that they are able to meet the needs of future generations.*

1.18.2.1 Comment:
Directly relevant. Policies 11.2 and 11.3 are similar and should be combined.

1.18.3 *Policy 11.4: Require district and regional plans to include provisions that avoid, remedy or mitigate the adverse effects of transportation and transportation infra-structure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*

1.18.3.1 Comment:
Directly relevant.

1.18.4 *Policy 11.7: Minimise the adverse impacts upon natural resources, in particular water quality, by road and railway maintenance activities including:*

i Managing the use of oil as a dust suppressant on unsealed roads;

ii Managing drainage ditch construction and maintenance; and

iii Managing spraying of verge vegetation

1.18.4.1 Comment:
This policy is not relevant. It is applicable to maintenance activity not efficiency of the network.

1.19 **Methods – Issue 3**

1.19.1 See comments for Issues 1 and 2, for Methods 11.1 to 11.12.

1.19.2 **Issue – 4**
Increases in the number of people and vehicles using different transportation modes reduces safety levels for other users of those modes, and to people residing beside (in the case of road and rail) and under (in the case of air) the routes used.

1.19.2.1 Comment:
This is not practical for existing routes, though should be taken into account for new routes. If the Region is developing economically there will be growth in existing corridors and nothing can be done to reduce the growth and the consequent effects. There may be some benefit from mode transfer but there will still be growth.

1.19.3 a *Objective 11.1: to minimise the adverse effects of transportation modes and infrastructure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*
b *Objective 11.2: To minimise the adverse effects on the region's transportation infrastructures, so that these physical resources are managed in such a way that they are able to meet the needs of future generation.*

1.19.3.1 Comment:
In this instance these are high level principles. This is an operational safety issue. Existing activities will in many instances be outside of the RMA process. In newer activities this is downstream from the planning process and growth in use will be a result of economic development. The only way to deal with this is to have periodic review as part of the use consent.

1.20 **Policies – Issue 4**

1.20.1 *Policy 11.1: Prepare a Southland Transportation Strategy that-*
a Identifies the environmental issues arising from the operation from the various modes of transportation in the region.

b Provides a framework for the future development and management of the transportation network in the region

c Identifies the means of implementing the strategy.

1.20.1.1 Comment:

(a) Relevant as far as it can influence the existing system.

(b) As noted above a Southland Transport Strategy may not be relevant today but the RLTS should deal with future growth and safety of the existing network.

1.20.2 *Policy 11.3: Require statutory resource management documents to include provisions that avoid, remedy or mitigate the adverse effects on the Region's transportation infrastructures, so that these physical resources can be managed in such a way that they are able to meet the needs of future generations.*

1.20.2.1 Comment:
Directly relevant. See previous note above re policies 11.2 and 11.3.

1.20.3 *Policy 11.6: Promote the introduction of accords, or other instruments, which relate to aircraft flight paths and operating regimes for aircraft approaching and leaving airfields.*

1.20.3.1 Comment: Directly relevant, but not easily implemented and in practical terms not likely to offer any real relief.

1.20.4 *Policy 11.7: Minimise the adverse impacts upon natural resources, in particular water quality, by road and railway maintenance activities including:*

i Managing the use of oil as a dust suppressant on unsealed roads;

ii Managing drainage ditch construction and maintenance; and

iii Managing spraying of verge vegetation

1.20.4.1 Comment:
Not relevant to operational safety.

1.20.5 *Policy 11.8: minimise the adverse effects of waste discharges on water quality from vehicles carrying stock or passengers, campervans and vehicle washing facilities on water quality.*

1.20.5.1 Comment:
Only slightly relevant to operational safety if health risks or hazardous spill are included. However needs a minor edit:- delete " on water quality" from the end of the policy – repetition.

1.20.6 *Policy 11.11: Encourage the establishment of traffic free areas.*

1.20.6.1 Comment:
Not relevant to operational safety, in this instance traffic free areas are an outcome of the planning process.

1.21 **Issue – 4 Methods**

1.21.1 *Method 11.1: Information, education, and public awareness. Provision of advice and information can be directed at raising the public awareness or, to specific activities, in order to minimise environmental effects. This can include the consideration of:*

- *The adverse impacts upon natural resources of road and rail construction and maintenance activities*
- *The adverse effects of uncontrolled waste discharges on water quality from vehicles carrying stock, and campervans*
- *The adverse effects that washing down vehicles in inappropriate areas on water quality*
- *The adverse effects that the movement of livestock can cause*
- *The adverse effects of the activities on the transportation network.*

1.21.1.1 Comment:
Directly relevant to operational safety.

1.21.2 *Methods 11.2: Promotion. Promotion of alternative, more efficient, transportation modes or more fuel efficient use, including fuel types and measures such as lowering the speed limit to reduce fuel use, can result in conservation of resources and, ultimately, sustainability of transport.*

1.21.2.1 Comment:
Partly relevant to operational safety.

1.21.3 *Method 11.3: Advocating. Advocate to Government the need to recognise that the regional contribution of Southland to Nation's economy, and as a vital link in tourism, depends on a well maintained and safe transportation network, which requires appropriate Government funding to operate efficiently and effectively.*

1.21.3.1 Comment:
Partly relevant in that enforcement can help operational safety.

1.21.4 *Method 11.4: Developing guidelines for resource users. Guidelines can be developed. For example, gravel extraction and spraying of the verge vegetation, in order to minimise adverse effects.*

1.21.4.1 Comment:
Partly relevant, though health and safety plans, road code already exist.

1.21.5 *Method 11.5: Protocols and Accords. Protocols can be developed between local authorities for responding to cross-boundary issues. Accords will be necessary in dealing with various activities, for example, aircraft movement into and out of airports, or with the shipping industry for the adoption of voluntary practices relating to the activities of ships passing through the regions waters.*

1.21.5.1 Comment:
Not relevant to operational safety.

1.21.6 *Method 11.6: Strategies. Strategies can be prepared setting out a regional perspective on such matters as a Regional Transportation Strategy. While not having a formal status under the Resource Management Act such documents could be used as a means of obtaining agreement between different organisations as to appropriate approaches to issues within the Region. Consultation will be required in preparing any strategies.*

1.21.6.1 Comment:
Directly relevant.

1.21.7 *Method 11.7: Prepare, Implement and Administer Regional and District Plans. In preparing Regional and District Plans, there will be a need to co-ordinate land use , transportation provisions and transportation infrastructure, and include provisions relating to:*

- *Activities near transportation routes*
- *Protection of transportation networks*
- *Standards relating to effects of transportation modes, including noise, vibration, glare, pollutants into waterways etc*
- *Standards relating to the effects of large scale transportation modes, including transportation yards, airports, railways yards, and sea ports*
- *Patterns of development that enable people to minimise their transportation needs.*

1.21.7.1 Comment:
Not directly relevant to operational safety of existing routes.

1.21.8 *Method 11.8: Plans, other documents, and action under other Acts. Action undertaken under other legislation, for example, the Regional Land Transport Strategy prepared under the Transit New Zealand Act, shall consider and have regard to the potential environmental effects of existing and proposed activities. Activities requiring consideration under other Acts will include:*

- *Disposal of waste from vehicles*

- *Noise of road and air transport*
- *Movement of hazardous substances*
- *Movement of stock on roads*

1.21.8.1 Comment:
Relevant for new work.

1.21.9 *Method 11.9: Resource Consents and Public Works. In the preparation and consideration of resource consents and public works, those that concern transportation shall consider effects on natural and physical resources, for example, the potential effect on flooding caused by changes to the vertical and horizontal alignment to roads and railways. Resource consents and public works not directly related to transportation shall consider their effect on transportation, where appropriate.*

1.21.9.1 Comment:
Directly relevant for new work, but not relevant for existing routes

1.21.10 *Method 11.10: Economic Instruments. Economic instruments can be used to provide incentives for modes of transport which have lower adverse effects on the environment.*

1.21.10.1 Comment:
Not relevant.

1.21.11 *Method 11.11: Works and Services. By the provision of works and services, territorial authorities can achieve a more effective transportation network and minimise environmental effects, for example, by the building of heavy traffic bypass routes.*

1.21.11.1 Comment:
Directly relevant for specific solutions.

1.21.12 *Method 11.12: Consultation. Consultation can be used to ensure the views of interest groups and the public taken into account in preparing documents and prior to making decisions on non-statutory matters.*

1.21.12.1 Comment:
Partly relevant.

1.22 **Issue – 5**

1.22.1 All forms of transportation in the Region rely upon petroleum-based fuels, which are a finite resource. Continuation of existing fuels and present technology is not sustainable.

1.22.2 *Objective 11.1: To minimise the adverse effects of transportation modes and infrastructure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*

1.22.2.1 Comment:
Partly relevant. This prime issue is about encouraging change to other fuel/conservation of existing resources so that these are available for future generations.

1.22.3 *Objective 14.1: To promote the sustainable management of energy resources and reduce the regions dependence on non-renewable energy resources.*

1.22.3.1 Comment:
Directly relevant.

1.22.4 *Objective 14.2: To avoid remedy or mitigate any adverse effects of mineral and energy resource development, production, use or transportation in the Region.*

1.22.4.1 Comment:
Relevant to the conservation of use, but not as to development of new sources – the issue is petroleum fuel conservation.

1.23 **Issue – 5 Policies**

1.23.1 *Policy 11.1:*

Prepare a Southland Transportation Strategy that-

a Identifies the environmental issues arising from the operation from the various modes of transportation in the region.

b Provides a framework for the future development and management of the transportation network in the region

c Identifies the means of implementing the strategy.

1.23.1.1 Comment:
Relevant, as the key aspect of this policy is to encourage change.

1.23.2 a *Policy 11.5: Promote energy conservation and efficiency with in the land transport sector.*

b *Policy 14.1: Promote the efficient use of all energy sources.*

c *Policy 14.3: Promote energy conservation.*

1.23.2.1 Comment:
Directly relevant.

1.24 **Issue – 5 Methods**

1.24.1 a *Method 11.1: Information, education, and public awareness.*

Provision of advice and information can be directed at raising the public awareness or, to specific activities, in order to minimise environmental effects. This can include the consideration of:

- *The adverse impacts upon natural resources of road and rail construction and maintenance activities*
- *The adverse effects of uncontrolled waste discharges on water quality from vehicles carrying stock, and campervans*
- *The adverse effects that washing down vehicles in inappropriate areas on water quality*
- *The adverse effects that the movement of livestock can cause*
- *The adverse effects of the activities on the transportation network.*

b *Methods 11.2 Promotion:*

Promotion of alternative, more efficient, transportation modes or more fuel efficient use, including fuel types and measures such as lowering the speed limit to reduce fuel use, can result in conservation of resources and , ultimately, sustainability of transport.

1.24.1.1 Comment:

Directly relevant.

1.24.2 *Method 11.3: Advocating.*

Advocate to Government the need to recognise that the regional contribution of Southland to Nation's economy, and as a vital link in tourism, depends on a well maintained and safe transportation network, which requires appropriate Government funding to operate efficiently and effectively.

1.24.2.1 Comment:

Not directly relevant. The issue is energy conservation. There is a requirement for increased use of coastal shipping and rail which may reduce the overall energy demand, but the real issue is getting the community to minimise the use of energy.

1.24.3 *Method 11.7: Prepare, Implement and Administer Regional and District Plans*

In preparing Regional and District Plans, there will be a need to co-ordinate land use , transportation provisions and transportation infrastructure, and include provisions relating to:

- *Activities near transportation routes*
- *Protection of transportation networks*
- *Standards relating to effects of transportation modes, including noise, vibration, glare, pollutants into waterways etc*

- *Standards relating to the effects of large scale transportation modes, including transportation yards, airports, railways yards, and sea ports*
- *Patterns of development that enable people to minimise their transportation needs.*

1.24.3.1 Comment:
Relevant, in that good development design reduces the need for trips and potentially trip length. However there is a need to start from first principles:- Integrated plan - a transportation network services the community/ land use and cannot be implemented as an add-on.

1.24.4 *Method 11.8: Plans, other documents, and action under other Acts.*
Action undertaken under other legislation, for example, the Regional Land Transport Strategy prepared under the Transit New Zealand Act, shall consider and have regard to the potential environmental effects of existing and proposed activities. Activities requiring consideration under other Acts will include:

- *Disposal of waste from vehicles*
- *Noise of road and air transport*
- *Movement of hazardous substances*
- *Movement of stock on roads*

1.24.4.1 Comment:
Could add the energy Conservation Act in here to reinforce the direction required - As written this is more applicable to Issue 1.

1.24.5 *Method 11.10: Economic Instruments. Economic instruments can be used to provide incentives for modes of transport which have lower adverse effects on the environment.*

1.24.5.1 Comment:
Directly relevant.

1.25 **Issue – 6**

1.25.1 The transportation policies adopted, and the transportation network promoted, within one territorial authority can have implications upon other and adjoining authorities. The same applies at regional level.

1.26 **Issue – 6 Objectives**

1.26.1 *Objective 11.3: Require statutory resource management documents to include provisions to avoid, remedy or mitigate the adverse effects on the on the Region's transportation infrastructures, so that these physical resources can be managed in a way that they are able to meet the needs of future generations.*

1.26.1.1 Comment:
Partly relevant, issue is cross boundary matters. Southland's various statutory resource management documents can not influence the behaviour of the neighbouring councils.

1.26.2 *Objective 18.1: To establish and maintain effective processes to deal with cross-boundary issues.*

1.26.2.1 Comment:
Directly relevant.

1.27 **Issue – 6 Policies**

1.27.1 *Policy 11.1: Prepare a Southland Transportation Strategy that-*

a Identifies the environmental issues arising from the operation from the various modes of transportation in the region.

b Provides a framework for the future development and management of the transportation network in the region

c Identifies the means of implementing the strategy.

1.27.1.1 Comment:
Directly relevant.

1.27.2 a *Policy 11.3: Require statutory resource management documents to include provisions that avoid, remedy or mitigate the adverse effects on the Region's transportation infrastructures, so that these physical resources can be managed in such a way that they are able to meet the needs of future generations.*

b *Policy 11.4: Require district and regional plans to include provisions that avoid, remedy or mitigate the adverse effects of transportation and transportation infra-structure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*

1.27.2.1 Comment:
Partly relevant. See comment at objective 11.3 above.

1.27.3 a *Policy 11.5: Promote energy conservation and efficiency with in the land transport sector.*

b *Policy 11.6: Promote the introduction of accords, or other instruments, which relate to aircraft flight paths and operating regimes for aircraft approaching and leaving airfields.*

1.27.3.1 Comment:
Not relevant.

1.27.4 *Policy 18.1: The Regional Council and the Region's territorial authorities and neighbouring regional and territorial councils, will consult with each other and takata whenua to seek jointly agreed solutions to cross-boundary issues.*

1.27.4.1 Comment:
Directly relevant

1.28 **Issue – 6 Methods**

1.28.1 *Method 11.1: Information, education, and public awareness.*
Provision of advice and information can be directed at raising the public awareness or, to specific activities, in order to minimise environmental effects. This can include the consideration of:

- *The adverse impacts upon natural resources of road and rail construction and maintenance activities*
- *The adverse effects of uncontrolled waste discharges on water quality from vehicles carrying stock, and campervans*
- *The adverse effects that washing down vehicles in inappropriate areas on water quality*
- *The adverse effects that the movement of livestock can cause*
- *The adverse effects of the activities on the transportation network.*

1.28.1.1 Comment:
Relevant.

1.28.2 a *Methods 11.2: Promotion.*
Promotion of alternative, more efficient, transportation modes or more fuel efficient use, including fuel types and measures such as lowering the speed limit to reduce fuel use, can result in conservation of resources and, ultimately, sustainability of transport.

b *Method 11.3: Advocating.*
Advocate to Government the need to recognise that the regional contribution of Southland to Nation's economy, and as a vital link in tourism, depends on a well maintained and safe transportation network, which requires appropriate Government funding to operate efficiently and effectively.

1.28.2.1 Comment:
Not relevant.

1.28.3 *Method 11.4: Developing guidelines for resource users.*
Guidelines can be developed. For example, gravel extraction and spraying of the verge vegetation, in order to minimise adverse effects.

1.28.3.1 Comment:
Partly relevant.

1.28.4 a *Method 11.5: Protocols and Accords.*
Protocols can be developed between local authorities for responding to cross-boundary issues. Accords will be necessary in dealing with various activities, for example, aircraft movement into and out of airports, or with the shipping industry for the adoption of voluntary practices relating to the activities of ships passing through the regions waters.

b *Method 11.6: Strategies. Strategies can be prepared setting out a regional perspective on such matters as a Regional Transportation Strategy. While not having a formal status under the Resource Management Act such documents could be used as a means of obtaining agreement between different organisations as to appropriate approaches to issues within the Region. Consultation will be required in preparing any strategies.*

c *Method 11.7: Prepare, Implement and Administer Regional and District Plans In preparing Regional and District Plans, there will be a need to co-ordinate land use , transportation provisions and transportation infrastructure, and include provisions relating to:*

- *Activities near transportation routes*
- *Protection of transportation networks*
- *Standards relating to effects of transportation modes, including noise, vibration, glare, pollutants into waterways etc*
- *Standards relating to the effects of large scale transportation modes, including transportation yards, airports, railways yards, and sea ports*
- *Patterns of development that enable people to minimise their transportation needs.*

1.28.4.1 Comment:
Directly relevant.

1.28.5 *Method 11.8: Plans, other documents, and action under other Acts. Action undertaken under other legislation, for example, the Regional Land Transport Strategy prepared under the Transit New Zealand Act, shall consider and have regard to the potential environmental effects of existing and proposed activities. Activities requiring consideration under other Acts will include:*

- *Disposal of waste from vehicles*
- *Noise of road and air transport*
- *Movement of hazardous substances*
- *Movement of stock on roads*

1.28.5.1 Comment:
This is not applicable to this issue - which is inter territorial Authority issues and inter-regional issues.

1.28.6 *Method 11.9: Resource Consents and Public Works. In the preparation and consideration of resource consents and public works, those that concern transportation shall consider effects on natural and physical resources, for example, the potential effect on flooding caused by changes to the vertical and horizontal alignment to roads and railways. Resource consents and public works not directly related to transportation shall consider their effect on transportation, where appropriate.*

1.28.6.1 Comment:
Partly Relevant. The issue is inter-territorial authority or inter-regional effects. The RMA does not fully encompass off-site effects.

1.28.7 *Method 11.10: Economic Instruments. Economic instruments can be used to provide incentives for modes of transport which have lower adverse effects on the environment.*

1.28.7.1 Comment:
Not relevant.

1.28.8 *Method 11.11: Works and Services. By the provision of works and services, territorial authorities can achieve a more effective transportation network and minimise environmental effects, for example, by the building of heavy traffic bypass routes.*

1.28.8.1 Comment:
This is relevant for specific solutions.

1.28.9 *Method 11.12: Consultation. Consultation can be used to ensure the views of interest groups and the public taken into account in preparing documents and prior to making decisions on non-statutory matters.*

1.28.9.1 Comment:
Directly relevant.

1.29 **Issue – 7**

1.29.1 The vertical and horizontal alignment of roads and railways can act as a barrier to the movement of floodwaters, and changes to those alignments can have impacts beyond the immediate area.

1.29.2 *Objective 11.1: to minimise the adverse effects of transportation modes and infrastructure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*

1.29.2.1 Comment:
Directly relevant

1.30 **Issue – 7 Policies**

1.30.1 *Policy 11.1: Prepare a Southland Transportation Strategy that-*

a Identifies the environmental issues arising from the operation from the various modes of transportation in the region.

b Provides a framework for the future development and management of the transportation network in the region

c Identifies the means of implementing the strategy.

1.30.1.1 Comment:
Directly relevant, noting previous comments re new RTS.

1.30.2 *Policy 11.3: Require statutory resource management documents to include provisions that avoid, remedy or mitigate the adverse effects on the Region's transportation infrastructures, so that these physical resources can be managed in such a way that they are able to meet the needs of future generations.*

1.30.2.1 Comment:
Directly relevant.

1.30.3 *Policy 11.4: Require district and regional plans to included provisions that avoid, remedy or mitigate the adverse effects of transportation and transportation infrastructure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*

1.30.3.1 Comment:
Directly relevant for new projects only.

1.30.4 *Policy 11.7: Minimise the adverse impacts upon natural resources, in particular water quality, by road and railway maintenance activities including:*

i Managing the use of oil as a dust suppressant on unsealed roads;

ii Managing drainage ditch construction and maintenance; and

iii Managing spraying of verge vegetation

1.30.4.1 Comment:
Partly relevant. This issue is not a water quality issue, it is a cross land water flow issue.

1.30.5 *Policy 15.8: Avoid inundation hazard to other property from activities that are undertaken with in riverbeds, floodways and floodplains.*

1.30.5.1 Comment:
Directly relevant

1.31 **Issue – 7 Methods**

1.31.1 *Method 11.7: Prepare, Implement and Administer Regional and District Plans.*
In preparing Regional and District Plans, there will be a need to co-ordinate land use , transportation provisions and transportation infrastructure, and include provisions relating to:

- *Activities near transportation routes*
- *Protection of transportation networks*
- *Standards relating to effects of transportation modes, including noise, vibration, glare, pollutants into waterways etc*
- *Standards relating to the effects of large scale transportation modes, including transportation yards, airports, railways yards, and sea ports*
- *Patterns of development that enable people to minimise their transportation needs.*

1.31.1 Comment:
Directly relevant

1.31.2 *Method 11.9: Resource Consents and Public Works.*
In the preparation and consideration of resource consents and public works, those that concern transportation shall consider effects on natural and physical resources, for example, the potential effect on flooding caused by changes to the vertical and horizontal alignment to roads and railways. Resource consents and public works not directly related to transportation shall consider their effect on transportation, where appropriate.

1.31.2.1 Comment:
Directly relevant.

1.32 **Issue - 8**

1.32.1 Aircraft flying across urban areas, particularly during landing and take-off manoeuvres, give rise to a safety risk to the residents of those areas.

1.32.2 *Objective 11.1: to minimise the adverse effects of transportation modes and infrastructure on natural and physical resources, so that these resources can be managed in such a way that they are able to meet the needs of future generations.*

1.32.2.1 Comment:
Decisions on safety should have been made at the time of consenting either the residences or the airport, whichever followed the other. If it is unsafe now, something should be happening now to remove the danger.

1.33 **Issue – 8 Policies**

1.33.1 *Policy 11.1: Prepare a Southland Transportation Strategy that-*

a Identifies the environmental issues arising from the operation from the various modes of transportation in the region.

b Provides a framework for the future development and management of the transportation network in the region

c Identifies the means of implementing the strategy.

1.33.1.1 Comment:
Directly relevant for new developments.

1.33.2 *Policy 11.8: minimise the adverse effects of waste discharges on water quality from vehicles carrying stock or passengers, campervans and vehicle washing facilities on water quality.*

1.33.2.1 Comment:
This is an error. This policy does not apply to this issue

1.34 **Issue – 8 Methods**

1.34.1 *Method 11.5: Protocols and Accords.*
Protocols can be developed between local authorities for responding to cross-boundary issues. Accords will be necessary in dealing with various activities, for example, aircraft movement into and out of airports, or with the shipping industry for the adoption of voluntary practices relating to the activities of ships passing through the regions waters.

1.34.1.1 Comment: :
Not relevant. Accords are not relevant. Accords may not be an effective tool if used after the infrastructure has been put in place.

1.34.2 *Method 11.6: Strategies.*
Strategies can be prepared setting out a regional perspective on such matters as a Regional Transportation Strategy. While not having a formal status under the Resource Management Act such documents could be used as a means of obtaining agreement between different organisations as to appropriate approaches to issues within the Region. Consultation will be required in preparing any strategies.

1.34.2.1 Comment:
Some relevance.

1.34.3 *Method 11.7: Prepare, Implement and Administer Regional and District Plans*

In preparing Regional and District Plans, there will be a need to co-ordinate land use , transportation provisions and transportation infrastructure, and include provisions relating to:

- *Activities near transportation routes*
- *Protection of transportation networks*
- *Standards relating to effects of transportation modes, including noise, vibration, glare, pollutants into waterways etc*
- *Standards relating to the effects of large scale transportation modes, including transportation yards, airports, railways yards, and sea ports*
- *Patterns of development that enable people to minimise their transportation needs.*

1.34.3.1 Comment:
Directly relevant for new activities but not relevant for existing legally established activities.

1.34.4 *Method 11.8: Plans, other documents, and action under other Acts.*

Action undertaken under other legislation, for example, the Regional Land Transport Strategy prepared under the Transit New Zealand Act, shall consider and have regard to the potential environmental effects of existing and proposed activities. Activities requiring consideration under other Acts will include:

- *Disposal of waste from vehicles*
- *Noise of road and air transport*
- *Movement of hazardous substances*
- *Movement of stock on roads*

1.34.4.1 Comment:
This method is not applicable to air safety risk.

1.35 **Issue – 9**

1.35.1 Maintenance of roads within the Region is dependent upon the availability of adequate supplies of suitable quality gravel.

1.35.2 a *Objective 6.4: to avoid where ever practicable, remedy or mitigate, the adverse effects of activities in, on, under, adjacent to, or over the beds of lakes, rivers and wetlands.*

b *Objective 11.3: Require statutory resource management documents to include provisions to avoid, remedy or mitigate the adverse effects on the on the Region's transportation infrastructures, so that*

these physical resources can be managed in a way that they are able to meet the needs of future generations.

1.35.2.1 Comment:
Directly relevant

1.36 **Issue – 9 Policies**

1.36.1 *Policy 6.12: Manage the regions fluvial gravel resources in such a way as to avoid, remedy or mitigate adverse effects on gravel extraction.*

1.36.1.1 Comment:
Directly relevant.

1.36.2 *Policy 11.1: Prepare a Southland Transportation Strategy that-*

a Identifies the environmental issues arising from the operation from the various modes of transportation in the region.

b Provides a framework for the future development and management of the transportation network in the region

c Identifies the means of implementing the strategy.

1.36.2.1 Comment:
Not relevant, the issue could be noted in the RTS, however resolution is an environmental rather than a transport issue.

1.36.3 *Policy 11.10: provide for the extraction of gravel from environmentally appropriate locations in order to enable the transportation networks of the region to be maintained at a reasonable cost.*

1.36.3.1 Comment:
Directly relevant.

1.37 **Issue – 9 Methods**

1.37.1 *Method 11.7: Prepare, Implement and Administer Regional and District Plans*

In preparing Regional and District Plans, there will be a need to co-ordinate land use , transportation provisions and transportation infrastructure, and include provisions relating to:

- *Activities near transportation routes*
- *Protection of transportation networks*
- *Standards relating to effects of transportation modes, including noise, vibration, glare, pollutants into waterways etc*

- *Standards relating to the effects of large scale transportation modes, including transportation yards, airports, railways yards, and sea ports*
- *Patterns of development that enable people to minimise their transportation needs.*

1.37.1.1 Comment:
Directly relevant.

1.37.2 *Method 11.9: Resource Consents and Public Works.*
In the preparation and consideration of resource consents and public works, those that concern transportation shall consider effects on natural and physical resources, for example, the potential effect on flooding caused by changes to the vertical and horizontal alignment to roads and railways. Resource consents and public works not directly related to transportation shall consider their effect on transportation, where appropriate.

1.37.2.1 Comment:
Directly relevant. The sourcing of aggregates may require a resource consent, but the method is not targeted at this activity.

1.37.3 *Method 11.10: Economic Instruments. Economic instruments can be used to provide incentives for modes of transport which have lower adverse effects on the environment.*

1.37.3.1 Comment:
Not relevant. This deals with the future capacity of a road, i.e. mode change, not gravel sourcing issues.

1.37.4 *Method 11.11: Works and Services. By the provision of works and services, territorial authorities can achieve a more effective transportation network and minimise environmental effects, for example, by the building of heavy traffic bypass routes.*

1.37.4.1 Comment:

Not relevant, only applies to transportation solutions not sourcing of gravels.

1.38 **Areas requiring amendments or corrections within the current Regional Policy Statement**

1.38.1 Page 22: SH list needs updating. Three new SH declared since 1997:

- SH 93 Clinton to Mataura
- SH 97 Five Rivers to Mossburn
- SH 98 Dacre to Lorneville

1.38.2 Page 35: Change to the Act relevant to Regional Land Transport Strategies under the third bullet point

1.38.3 Page 149: Para 4, last sentence.

1.38.3.1 This is more of an emotive statement that is not reflected in the accident statistics. Large trucks are intimidating and generally an accident with a truck has more severe consequences but there is nothing to support the statement that increasing their size and number reduces safety any more than increasing other modes of traffic.

1.38.4 Page 151 Para's 2 and 3

1.38.4.1 Require updating to latest legislation

1.38.5 Page 160 Section 5.11.8 Roles.

1.38.5.1 This section needs review, legislative changes have had an impact on roles especially Transit New Zealand.

1.38.6 Other

1.38.6.1 Page 243 Policy number needs correction – 2 x policy 18.1