

Sandy Fong  
Policy and Planning Group  
Land Transport New Zealand  
P.O. Box 2840  
Wellington

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Dear Sandy

Thank you for the opportunity to comment on the Land Transport New Zealand (Land Transport NZ) Community Focused Land Transport Activities consultation document (the Document). Waitakere City Council supports the proposal to combine the Community Road Safety Programme (CRSP) with other community focused land transport initiatives and to integrate them into the National Land Transport Programme (NLTP). Waitakere City Council also supports the promotion of land transport safety and sustainability in an integrated manner.

A concern we do have with the Document is a lack of certainty about which organisation is being referred to when the term 'approved organisation' is used. In the Auckland region we will require absolute clarity in the use of this term, that is, whenever the Document indicates a particular responsibility or task allocated to an approved organisation, we require clarification as to whether a Territorial Authority or the Auckland Regional Transport Authority (ARTA) is being referred to.

**Specific questions from the consultation questionnaire**

This submission is from Waitakere City Council – Territorial authority

*Do you have any comments on the proposal to integrate community road safety activities into the annual land transport programme process?*

Waitakere City Council supports the integration of community road safety activities into the annual land transport programme. A condition of this support is an assurance from Land Transport New Zealand that sufficient levels of direction and guidance will be available for Council and Council staff to successfully manage

community road safety projects and activities operating previously outside of the land transport programme process.

Waitakere City Council supports the intention to broaden CRSP (including local advertising) to also address sustainability issues but notes that the Document does not clearly indicate that community activities may focus on road safety **and/or** sustainability issues.

*What advice and support will you need to become fully involved with planning and managing community road safety activities?*

Appropriate new Council staff will continue to require induction training and ongoing education in community road safety, and new and existing Council staff would benefit from education and advice in transport sustainability issues. This will be a new field of work for some road safety coordinators. It is assumed job descriptions may change to more accurately reflect a broader work programme should CRSP be expanded to address sustainability issues.

Waitakere City Council will require clear process guidelines for administrative requirements, and will also require an ongoing relationship and direct access to regional Land Transport NZ staff. Printed materials, online information, best practice guidelines and other resource will continue to be needed. Assurance is sought that these resources will continue to be provided by Land Transport NZ and will be updated as necessary.

Road Safety Coordinators in Waitakere have a close working relationship with many community groups implementing quality road safety activities in the City. The requirement of the Document for Council staff to work even more directly with these groups is supported, although a longer transition period may be needed than is currently indicated for community groups to understand that the direct access to Land Transport NZ staff that they have had for some time is changing. Another result of closer links between community groups and Council staff may be that community groups view resolutions of funding and governance that negatively impact on their work as decisions made solely by Council staff. In particular, funding decisions have been viewed by the community as the judgment of Land Transport NZ. Mediation expertise may be required to ensure that relationships between Council staff and community groups continue to be positive and beneficial to both parties. Guidelines for decision makers should be made available, this is particularly important for funding decisions related to community programmes.

The Document does not specifically outline what new administrative requirements may be required of Council staff. Any new or increased administrative processes will require guidelines and support for staff involved. Extra responsibilities on the Council to provide for staff for new work programmes, specifically coordinators, will need to be funded by Land Transport NZ.

It is preferable that Council staff (in particular road safety coordinators) are consulted with, and are involved, in the development of any new process relating to the day-to-day planning and management of community road safety and/or sustainability activities.

*Do you have any comments on the proposal to integrate Safer Routes projects (broadened to become neighbourhood accessibility planning projects) into the annual land transport programme process?*

Waitakere City Council supports the redevelopment of Safer Routes projects broadening the focus to encompass sustainability. It is our understanding that neighbourhood accessibility planning projects have the potential to generate demand for more community focused activities, particularly community road safety activities and other types of community promotion or education activities and are broader than the existing Safer Routes projects because they do not need to be initiated in high risk safety areas.

Clarity is needed about how neighbourhood accessibility planning projects differ from and/or complement ARTA town centre transport plans, and how neighbourhood accessibility planning projects activities will be funded in relation to the proposed funding profile for town centre transport plan activities in ARTAs draft Sustainable Transport Plan June 2006-2016 (the draft Plan). The draft Plan indicates that Safer Routes (and so subsequently neighbourhood accessibility planning projects) is integrated in the town centre transport process, but the Document does not specify how this will happen.

As with other sections of the Document, implications for making Safer Routes part of the NLTP indicate that a change in responsibility will be required in some areas. In the Auckland region allocated tasks and activities cannot be generically allocated to 'approved organisations' but must specify either ARTA or Territorial Authority as the proposed responsibility holder. The Document does not reflect the Auckland situation whereby Territorial Authorities do not apply directly to Land Transport NZ for funding. A weakness

of the Document is that it does not acknowledge or provide for the unique role that ARTA has in the Auckland region.

Funding applications in this area will require special treatment. Land Transport NZ should make the funding application process simpler by providing a generic priority or benefit cost ratio or it should provide financial or other assistance to carry out this work. Currently, Waitakere City Council builds, maintains and upgrades footpaths, removes graffiti and maintains lighting as part of a general programme for the City. Most of this work is 100 percent funded by Waitakere City Council. Land Transport NZ needs to provide clarity about the type of work it will fund.

*What advice and support will you need to become fully involved with planning and managing neighbourhood accessibility planning activities?*

Waitakere City Council seeks ongoing and direct access to knowledgeable regional Land Transport NZ staff trained in neighbourhood accessibility planning projects. We also ask for more guidance as to how neighbourhood accessibility planning projects activities fit with school and workplace travel plans and town centre transport plans.

*What advice and support will you need to become fully involved with travel planning activities?*

Waitakere City Council is already fully involved with travel planning activities. We are implementing school travel plans in collaboration with ARTA, and are in the process of implementing a workplace travel plan for the new location of the Council, Waitakere Central. With the assistance of ARTA school travel planners, Waitakere City Council implements the TravelWise planning process for school travel plans, and has also followed the TravelWise workplace travel plan process for the Waitakere Central workplace travel plan. The Document indicates that travel planning activities will be standardised to facilitate implementation, but does not recognise the TravelWise process as a best practice model, nor does it indicate whether or not TravelWise will be an accepted process for travel planning.

Waitakere City Council staff may require professional development in the area of personalised travel planning, and desire ongoing training and information on innovations and new developments in all aspects of travel planning.

Waitakere City Council requests a simpler process to make funding applications to Land Transport NZ in relation to work required by a travel plan. It is time consuming and expensive to analyse existing and future use of footpaths and cycleways in order to justify funding for infrastructure to support a travel plan. Land Transport NZ should make this process easier by providing a generic priority and benefit cost ratio or should provide financial or other assistance to carry out this work.

*Do you have any general comments on the proposal for the work category structure for 'system use' activities?*

The three categories - community coordination, community programming and community advertising need more detailed explanations of activities that they cover. Waitakere City Council agrees that CRSP activities should not all come under one heading or category, but seeks clarity about the relationships between each work category so that there is no ambiguity as to how they naturally follow on, complement and support one another.

*Do you have any comments about the proposal to group together community road safety, travel planning and neighbourhood accessibility planning?*

The proposal to group together community road safety, sustainability, travel planning and neighbourhood accessibility planning will assist in the coordination and integration of all activities and plans within approved organisations. Some of these activities appear to have very similar outcomes (for example, the outcomes of neighbourhood accessibility projects and school and workplace travel plans) which may result in an overlap of activity. This effect may well be positive for communities and approved organisations, but Land Transport NZ must work closely with ARTA and other approved organisations so that all parties are clear about how these activities will work together to deliver the best outcome.

A concern was also expressed that important road safety activities may "get lost" in the wide range of other sustainable transport initiatives that communities may choose to become involved in. Land Transport NZ is requested to continue to promote the importance of community road safety work and also closely monitor any reduction in community road safety activity.

*Do you have any comments on the proposed descriptions of the work categories?*

As stated earlier in this submission, the descriptions of the three community work categories need further detail so that there is not uncertainty of definition or activity.

Community advertising has been singled out as still requiring technical approval by Land Transport NZ. The Document notes that advertising proposals will continue to be submitted to Land Transport NZ's advertising manager via Land Transport NZ regional staff. Waitakere City Council disagrees with this proposal. If approved organisations are seen as capable of managing and planning all other areas of community coordination and programming, it would be appropriate for the community advertising category to be managed and planned in the same way. Land Transport NZ should provide professional development and training in this area in the same manner as will be required to manage changes to other processes, initiatives and activities. We believe that if Land Transport NZ intends to provide advice and assistance to approved organisations instead of dealing directly with community groups in other areas, the community advertising category should be dealt with in the same way.

The category of associated engineering works states that "Funding for pedestrian and cycle facilities and for road improvements may be requested by approved organisations in the annual LTP." This statement appears to indicate that Land Transport NZ will accept and consider funding proposals for pedestrian facilities. We request Land Transport NZ clarifies if this includes funding for new footpaths.

*Should delivery of small community initiatives be provided for under the community coordination work category and, if so, what should be the limit on these activities?*

Waitakere City Council considers that delivery of small community initiatives should be provided for under the community programmes category rather than the community coordination category. We believe that the type of application we are most likely to receive from community groups for small initiatives would best fit the activities outlined in the community programmes category. We recommend a limit of \$5,000.00 for these small community initiatives and activities.

*Should Land Transport NZ continue to provide similar internet-based support for all aspects of community focused programmes for use of the land transport system as that currently provided for CRSP or do you have suggestions for something different?*

The information currently provided by Land Transport NZ is of a high standard and is used regularly by road safety coordinators. Waitakere City Council supports Land Transport NZ continuing to provide this type of online support, regularly updated and reviewed.

However, not all community groups have access to the internet in order to gain this information. Coordinators have advised that hard copy materials are still needed for many community groups. Council staff working directly with community groups would be able to distribute information supplied by Land Transport NZ to community groups, however additional administrative support would be required.

*Should Land Transport NZ continue to provide induction courses, learning and development opportunities and a biennial conference for all aspects of community focused programmes for use of the land transport system, as those currently provided for CRSP or do you have suggestions for something different?*

We support and encourage Land Transport NZ continuing to support the professional development of coordinators and community groups. Waitakere City Council seeks assurance that any review of Land Transport NZ's involvement and support of professional development involves wide consultation with affected parties, (as indicated in section 5.8 of the Document).

A biennial conference for community focused transport programmes is unique in New Zealand and should be retained.

There was some concern expressed at Land Transport NZ's ability to maintain contact and a sound understanding of community 'grass roots' needs if they are no longer dealing directly with community groups.

*Should Land Transport NZ provide an incentive financial assistance rate for community coordination, community programmes and community advertising?*

Subject to the Minister of Transport's approval, Waitakere City Council is very supportive of the 75 percent financial assistance rate (FAR) for community coordination, community programmes and community advertising.

The Document indicates that the 75 percent FAR would apply for 2007/2008 and 2008/2009. We request that this period is extended until 2009/2010 to more fully understand the implications of the FAR, and to allow all approved organisations to have a full understanding of a new system of community focused land transport activities along with at least two years activity within the new process. The Document signals that Land Transport NZ intends to continue to direct fund community groups in districts or regions for 2007/2008 in cases where the territorial authority or regional authority does not have the capacity to manage community focused activities, these cases will still require a full two years to work within the proposed 75 percent FAR.

Waitakere City Council recommends a financial assistance rate of 75 percent as a minimum rate beyond the review period.

*Do you have any comment on the assessment, evaluation, review and reporting proposals described in the consultation document?*

It would appear that assessment, evaluation, review and reporting requirements will significantly increase administrative requirements and responsibilities for approved organisations. Clear administrative guidelines should be included in post-evaluation resource kits.

Waitakere City Council reiterates that community advertising requirements should match those of other work categories.

The TravelWise travel planning process has clear assessment criteria and guidelines. The Document does not specify whether or not approved organisation will be required to coordinate ARTA TravelWise reporting requirements with Land Transport NZ requirements.

*Other points of note*

Activities and changes in the Document need to be included in ARTA's Sustainable Transport Plan and the Auckland Transport Plan in order to receive priority funding from Land Transport NZ.

Land Transport NZ should more clearly demonstrate the efficiencies and improvements that TAs and communities can expect as a result of the new arrangements.

**Conclusion**

Waitakere City Council thanks Land Transport NZ for the opportunity to provide feedback on the Community Focused Land Transport Activities Consultation Document June 2006. We would appreciate being informed of the outcome of this submission, including a response to specific issues that have been raised.

Yours sincerely

## BUSINESS LOCATION PRINCIPLES FOR TERRITORIAL LOCAL AUTHORITIES IN THE NORTHERN AND WESTERN SECTORS OF THE AUCKLAND REGION

The following principles are agreed by Waitakere City Council, North Shore City Council, and Rodney District Council (the Councils) as providing policy guidance for planning the location of business development within their territories over the next 20 years.

These principles will be expected to be incorporated into any review of the Regional Growth Strategy and to be recognised in the Regional Business Location Strategy.

It is also acknowledged that the Councils will continue to work together and consult with their business communities to address and resolve the issues that were identified and raised in the sectoral business futures forums in 2005.

These principles are adopted in order to promote the social, economic, environmental and cultural well-being of the present and future communities of each of the Councils in accordance with section 10 of the Local Government Act 2002.

In applying these principles the Councils will take a sector wide approach.

### ***Principles:***

#### **1. Shared Opportunity and Sufficient Land Supply**

Planning for future business location will aim to provide a balance between population growth and employment opportunities such that the Northern and Western Sectors, and the TLAs within them, are able to provide local employment for the majority of their populations and economic growth for the Region and the Country.

#### *Explanation*

*The Northern and Western Sectors have the fastest growing population of the Region. However, there is a shortage of business land and a lack of balance between residential growth and business land. To achieve their desired business futures, and the desire of residents to live, invest, work and play locally, the Northern and Western Sectors require an adequate supply of business land.*

*One of the major challenges facing the region and the Northern and Western Sectors is how to reconcile rapid population growth with local employment opportunities. The relationship between business land supply, location, and residential population locations is a significant issue in terms of minimising fossil fuel usage, the creation of robust urban areas capable of dealing with external changes to the global environment such as higher fuel costs, emissions of greenhouse gases, traffic congestion and the lifestyle and well being of the people of the Northern and Western Sectors.*

*In addressing this issue business land requirements will be met through a mixture of greenfield and brownfield development, noting that current information indicates that by 2031, a minimum of 200ha of new business land is required in southern Rodney District and a minimum of 400-600ha of new business land is required in North Shore City/Waitakere City.*

#### **2. Balance**

Increasing the supply of new business land will be achieved through a balance of intensification of existing business land, development of greenfield land, and

brownfield development to provide for the operation of the Business Land Demand Cycle.

*Explanation*

*When businesses grow, so does their need for larger premises. When a business grows and moves to a larger site/ building, this frees up land for new business to be located upon, but also requires new land for businesses to locate to. This cycle is referred to as the Business Land Demand Cycle. A sufficient supply of new business land needs to be available for the Business Land Demand Cycle to operate. While the Councils are committed to the Auckland compact city model, they recognise that to foster economic development and business growth increasing the supply of business land needs to be achieved through a balance of intensification and provision of new business land.*

3. Equity

Planning for future business location will aim to maintain an equitable ratio of employment land and opportunities within other TLAs and Sectors within the region, and to respond to the demands of the business sector for locational choices in a timely way.

*Explanation*

*Currently there is an imbalance in the location and supply of business land across the region. The majority of the existing vacant and planned new supply of business land is located in the Central and Southern Sectors of the region. This inhibits the ability of the Northern and Western Sectors to attract new business and to provide for the growth of existing businesses, potentially creating a competitive disadvantage. The current regional business land use pattern also creates barriers to employment for sectors of the labour market. Ensuring that business land supply is provided equitably across the region will bring about a change to Auckland's unsustainable travel patterns and is a fundamental tenant for the sustainable development of the Auckland Region and the people and communities of the Northern and Western Sectors.*

4. Efficiency

Future business locations in the Northern and Western Sectors will be planned to maximise the potential for economic development of the region with regard to the location of ferry, rail, bus, and roading infrastructure, business demands, supply infrastructure, ports and airports.

*Explanation*

*Alignment of the current transportation system and urban form must occur to reduce the costs of access to employment and maximise the economic potential of infrastructure. These costs include social and community costs, employment costs, environmental costs, ability to recruit skilled staff, loss of business synergies, cost of material/product/services movements and economic leakage. Providing local employment is the most cost effective transport intervention that the Councils can undertake. Strategies and plans for future development and the physical form of urban areas needs to bring about a reduction in the reliance on non-renewable energy sources.*

5. Intensification

Business location planning within the Northern and Western Sectors will aim to encourage intensification of appropriate business land use, by adopting policies and strategies to support business land intensification while allowing for the dynamics of the Business Land Demand Cycle.

*Explanation*

*In the longer term, and in order to achieve a more efficient use of business land and the compact city objectives of the Auckland Region, the Councils will facilitate the intensification of business land areas. This is likely to be a complex and lengthy task. It is possible that the current legal, financial and structural tools available to councils will not be sufficient to bring about the redevelopment of existing business land areas on the scale required to address this issue. Each Council will also need to determine the level of intervention it is prepared to take. The Northern and Western Sectors will investigate, as a matter of priority, methods to bring about 'Brownfield' development and the 'intensification' of business land use.*

6. Innovation

The Councils undertake to keep informed about, and to plan for, changes in technology infrastructure, energy supplies, and the wider macro-economic environment, so that future business locations are provided that meet the needs of business and provide for future changes in the business environment in a sustainable way.

*Explanation*

*Councils have limited control over many issues that impact on business development. However, the Councils can ensure that they understand the issues so as to advocate effectively and/or partner development and ensure that in their planning for business location, social and environmental issues are addressed and provided for in an integrated way.*

7. Location and Protection

Business land should be secured from other uses, affordable, encourage clusters, be well located in relation to residential populations and infrastructure with moderate topography, and be accessible.

*Explanation*

*While in many instances mixed use development should be encouraged, the ad hoc use of vacant business land for residential development has in the past eroded the bank of vacant business land. The ad hoc use of vacant business land for residential uses, and other activities, such as educational uses, that foreclose options for the future should be avoided.*

8. Strategic Infrastructure.

The Councils will work together to ensure that strategic infrastructure assets are in place and protected for the future (e.g. airports, energy supply and generation, education facilities and transport infrastructure).

*Explanation*

*Efficient utilisation of existing and planned strategic infrastructure assets has the potential to significantly enhance the economic performance of the Northern and*

*Western Sectors. In particular Councils have noted the importance of Whenuapai to its business communities and that the state highway network has a critical role in providing accessibility for people and communities.*

9. Leadership

The Councils of the Northern and Western Sectors will continue to show strong leadership and will continue to work with economic development agencies, businesses and other agencies (e.g. Transit New Zealand, Ministry for Education, health service providers, government) .

*Explanation*

*The Councils will advocate when appropriate to address issues such as the skills and capabilities of their workforces, reduction of compliance costs, provision of information technology infrastructure and the interests of the Northern and Western Sectors.*

## **Comments to Draft Regional Business Land Plan (Feb 2006) Waitakere City**

### **Part One. General Comments**

These comments should be read with reference to our submission on the draft Auckland Business Location Strategy. Most of the comments made by Waitakere City Council in relation to the Auckland Business Location Strategy apply equally to the Auckland Region Business Land Plan.

- **Mix of business land uses**

Proposed policy framework of allowing only for Group 1 businesses (large format industry/ manufacturing etc) to locate in greenfield areas will not deliver a sustainable urban form. Waitakere has learnt this from its current MUL proposals. Planning for business development on the periphery requires a mix of land uses to deliver a more sustainable urban form. Through our extensive "enquiry by design" work, we have realised a range of employment land needed to be planned for in the Massey North & Hobsonville area to ensure a better balanced business & industry structure for Waitakere in this part of the Auckland region. It was critical to provide a broad range of local employment opportunities and to ensure essential services are available locally to support the proposed industry clusters and meet local needs of the growing population.

- **Impacts on the transport network**

Alleviating transport congestion by locating business/ employment in proximity to residential catchments is critical – approaching peripheral growth with a mix of land uses will help to achieve this rather than the approach suggested by Business Land Plan policies which seeks to locate only Group 1 businesses (industries) on the edge.

- **Acknowledging the existing imbalance in the location of business land availability across the region**

Whilst the assessment of business land capacity and availability has addressed the issue that the supply of business land is being used up and the availability is diminishing, the report has neglected to address the issue that the Auckland regional economy is composed of distinct sub-regional economies and that each needs to be given appropriate opportunities for growth in order to contribute to the region's overall competitiveness. There is no recognition, or attempt to redress, the existing major imbalance in the provision of business land around the region in the Business Land Plan.

- **Acknowledging the need to provide business land in proportion to future population and workforce levels**

The Business Land Plan fails to recognise that the Auckland regional labour market cannot be viewed as a single entity because of the distance & travel constraints. Although local employment is identified in the policies/ principles this needs to be articulated in relation to the Sectors – employment opportunities must be available across the North-West, Central and Southern Sectors to match existing and projected population growth and to facilitate the ability for residents to be able to live, invest, work and play locally.

- **Development within Corridors not addressed in policies/ principles**

Intensification of corridors is identified in the Regional Growth Strategy and "corridors" are included in Schedule 1 (RPS). Waitakere has included more corridors through a new growth policy chapter (Plan Change 16) which we have sought through submissions to be included within the RPS (Schedule 1). Intensification of Corridors would incorporate mixed use with residential and Group 2 type businesses – generally the Business Land Plan is only identifying this to town centres.

- **Clarify provision of public transport to new greenfield areas**

The report contains conflicting information and therefore it needs to be clarified that public transport will be supported and provided to new greenfield areas containing employment/ business development– not just prioritised only to existing centres and urban areas.

- **Relationship of Regional Business Land Plan to Regional Policy Statement Changes - LG(A)AA 2004 process**

The Plan Changes that have been notified to the existing RPS, particularly related to business/ economic development and policies associated with the MUL are still going through a statutory process. Waitakere have submitted a number of submissions, and even if our relief is not totally accepted we are still anticipating there will be changes made.

The report implies that whilst the Business Land Plan is non-statutory, it provides policy guidance and support to policies contained in the RPS. Given that we are going through a statutory process to amend policies within the RPS, and that Waitakere has made submissions to those proposed policies, to try and get regional support to the Regional Business Land Plan ahead of determining the final content of the RPS policies is problematic and needs to be thought through by the ARC. This raises a significant issue about the timing of trying to introduce such a document as the Business Land Plan ahead of sorting out the statutory policies.

Previously ARC Officers had explained that the Business Land Plan work was not related to the RPS changes being sought under the LG(A)AA process. From what was implied in the report the two are very much connected and in fact the Business Land Plan could well be used as evidence through the statutory hearings process. There is a process/ timing issue here particularly as it is sought to try and get regional endorsement to the Business Land Plan (which the report is implying has already happened), and still seeking to get statutory policies associated with new greenfield development, resolved.

- **Not all Group 1 businesses are heavy industry**

There are parts of the report that have made the assumption that all Group 1 industries are heavy industry and need to be in industrial air management quality zones. This also comes through in the policies/ principles and is an in-correct assumption.

- **Business Land Plan should focus on outlining strategic framework rather than assessment criteria**

A little concerning is the requirement of meeting assessment criteria that has been included within the Business Land Plan may be adding another level into the already complex process of preparing and providing the appropriate information to satisfy the statutory requirements of shifting the MUL. Whilst it is not disputed that there needs to be the detailed work and assessment undertaken in order to satisfy requirements to bring on additional urban land – by adding another layer of assessment which appears to be duplicating to a large extent other processes which already have requirements to satisfy, seems unduly onerous and very confusing. It may well be that the Regional Business Land Plan should seek to focus on outlining the strategic framework for bringing on additional greenfield land for business purposes. If assessment criteria require reviewing and updating, it would be better to work through existing requirements that already need to be met and amend and update these.

- **North West Sector Business Location Principles**

In response to the ARC's invitation to engage in further dialogue over the Business Location Strategy, the councils of the Northern and Western Sectors undertook a series of interactive business forums with their business communities to better understand their future location requirements.

As a result of these forums, a set of nine principles have been developed that have subsequently been endorsed by all of the Councils of the Northern and Western Sectors. Although we have not been in a position to formally present these back to the region, we would anticipate that the development of the Regional Business Land Plan would provide the opportunity to incorporate the business principles that have been developed from the North West Sector Council's