

SUBMISSION ON THE GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT: 2021/22-2030/31

8 May 2020

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing Construction Material companies which produce an estimated 40 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates, and assist in developing a highly skilled workforce within a safe and sustainable work environment.

Background

Accessing, extracting, processing and transporting aggregate (crushed rock, gravel and sand) is needed for the construction of infrastructure in New Zealand.

Central and local government will need to invest an unprecedented amount of money into infrastructure, such as schools, hospitals, roads and transport, to meet anticipated population growth. The New Zealand Government relies heavily on locally sourced aggregate resources for infrastructure repair following disasters, for road and rail transport corridors, major projects and for housing development, all of which are essential for the social, economic and cultural well-being of our communities.

Currently, the cost of a tonne of aggregate doubles when it has to travel 30 kilometres from a quarry, with additional costs for each extra kilometre thereafter. By ensuring quarries are close to their markets sees transport costs, transport congestion and carbon emissions, significantly reduced.

We make the following submission in relation to the Draft for engagement – Government Policy Statement (GPS) on Land Transport: 2021/22–2030/31

The strategic priorities for GPS 2021

We are generally in support of the four strategic priorities for GPS 2021.

It is critical however that the definition of “primary production” is consistent with the National Planning Standards introduced by this Government and gazetted in April 2019.

The Government's 2019 National Planning Standards define primary production as:

Primary Production	<p>Means:</p> <ul style="list-style-type: none"> a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a); c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but d) excludes further processing of those commodities into a different product.
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MfE made the decision to include mining and quarrying in the above definition due to the fact that most mineral extraction occurs in rural areas and that the RMA definition of "productive land" is used for a limited purpose and does not define all primary production activities (*Ministry for the Environment. 2019. 21 Definitions Standard – Recommendations on Submissions Report for the first set of National Planning Standards*).

In order to retain consistent definitions across planning and policy documents, and avoid confusion and potential conflict, the 2019 National Planning Standards definition of primary production should be used in the proposed Government Policy Statement on Land Transport.

Strategic Priority: Safety

We generally agree that land transport safety needs to be a strategic priority.

Higher investment in road design and construction is required to increase infrastructure life, and lower repair requirements. Though the number of accidents related to poor road surface conditions (potholes, bleed areas, uneven surfaces, wheel rutting etc) is not specifically highlighted, these road surface conditions do contribute to accidents.

The current NZTA model of constructing cheap roads (low capital cost) and relying on ongoing repair and maintenance means roads are continually under repair or damaged through failure of the pavement. This adds to safety issues due to rutting, potholes, road edge failure (subsidence, erosion) etc. Continual road maintenance has seen a number of tragic incidents involving road workers who are being placed onto the highway network more often to repair and maintain poorly constructed roads.

Of particular concern is the state of rural roads. We believe there needs to be an across the board, increase to the Financial Assistance Rate (FAR) thereby increasing the Government's funding proportion of both the maintenance of, and capital expenditure on, local roads. Significant investment has been made to state highways

and major arterial routes, but many local roads are in a poor state, unsafe and vulnerable to adverse events.

Where a road is a key part of the freight network, ensuring good road infrastructure and maintaining appropriate higher speeds is important. Such infrastructure must include suitable corridor widths and turning bays which allow safe travel for long vehicles. We need to build intersections and entry/exits to sites to cater for slower commercial vehicles to enter/exit the road network safely and blend in with local traffic.

We support encouragement of fleet modernisation through either penalties or positive enforcement. We support lower ACC costs for vehicle operators with GPS, fatigue management or similar technologies installed. We would also support lower Road User Charges (RUC) for more modern vehicles (ANCAP and/or UCSR rated), and conversely higher RUC for older vehicles.

We believe mandatory safety features on all vehicles, including a mandatory ANCAP or UCSR rating, are critical to improving the safety performance of all road vehicles. There may need to be a transition for older vehicles, but it is important that improving the safety of vehicles is not delayed further.

Strategic Priority: Improving Freight Connections

We agree that improving transport connections, alternative routes and investments in multiple travel modes, will boost the ability of the transport system and communities to recover from disruptive events, supporting continuity in economic activity and regional development. This will be particularly important as the economy recovers from the COVID-19 pandemic. Job-rich projects like core infrastructure, housing, and environmental restoration are crucial to the Government's plan to stimulate the economy.

As stated in the recent NPS-Urban Development discussion document "transport systems are poorly integrated with land use, and lack high-quality options to improve access to jobs, and reduce car dependency".

We support review of options for moving aggregate around the country on rail or coastal shipping, particularly where distances from quarry to market increase. Previous attempts by our sector to access such options have been both prohibitively expensive and/or difficult logistically to organise within demand timeframes. That said we would be happy to work with Government and transport delivery providers to pursue options for such methods of transporting aggregates around the country.

Strategic Priority: Climate Change

Climate change and rising sea levels are going to put added pressure on rock supply for sea walls, riverbank protection and restoration.

Demand is almost totally domestic and currently the only alternative to local extraction and supply of aggregates is to import aggregates to meet demand.

It is likely that such imports would come from countries who are not operating in sustainable ways nor aiming to achieve carbon neutral targets similar to the ambitions of New Zealand. Importing of aggregates would also put added pressure on our ports, infrastructure and increase carbon emissions through delivering aggregates greater distances.

Technically and economically viable opportunities to reduce energy-related emissions and adopt clean energy technologies exist now. However, the aggregates sector currently face a number of barriers that hinder the uptake of clean energy technologies and other cost-effective measures to reduce emissions such as:

- Road networks are not designed to take the additional weight of electric heavy vehicles. Even if state highways are upgraded, the road networks connecting quarries with their markets include a large number of rural roads.
- Unnecessary regulatory and cost barriers inhibit our ability to unlock least-cost abatement opportunities and encourage rapid uptake of low-emissions technologies. An example here is Resource Management processes that are complex, litigious and costly, and are frequently disproportionate to the decision being sought, or the risk or impact of the proposal.
- There is little incentive for recycling and re-use due to the cost of processing these products relative to natural products and the reluctance of customers to specify and/or allow the use of recycled products. These customers include central and local government who are both significant users of aggregates and sand.

Principles for investing

Making the most of our existing land transport network

We agree that existing networks and services could be used more efficiently, however if we continue to embrace technology including heavier electric vehicles and modern heavy vehicle configurations, we need to continually upgrade the road network to compliment this technology.

More efficient use of networks in relation to supply of aggregates and sand could mean more flexible operating hours in areas to reduce traffic congestion at peak times and spread the load on roads. An example here is the restocking of resale

yards, concrete and asphalt plants in urban areas at night so that trucks are off major arterial roads during the morning peak times. While this may involve 24-hour operations for loading, this can be done while mitigating the operation's impacts on the environment and ensuring community wellbeing is maintained.

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