Marlborough District Council’s Long-Term 10-year Plan. (LTP)

1. INTRODUCTION

NZ Road Transport Association Region 4 is a constituent member of Road Transport Forum NZ, representing goods transport operators in the hire and reward sector. The Association represents more than 400 members, operating approximately 1800 trucks in the South Island north of the Waitaki River and including transport operators in the Upper South Island Region.

This includes some 120 members of the Marlborough and the Nelson/Tasman Branches operating in excess of 400 trucks. Members service all sectors of the economy and operate fleets ranging from single vehicle owner operators to fleet operators within excess of 100 trucks in multiple locations. Members service the region with intra and inter-regional operations and services. Many members offer multi-faceted operations including road transport services, warehousing, import and export services, customs clearing, freight forwarding, container handling and storage.

The Road Transport Industry provides the land transport for all products grown, produced, manufactured, exported from, imported into, and distributed to or from the Tasman Region. Major products carried include logs from forests, wood products and wood chips, horticultural products, and fish products as well as manufactured goods.

We have already put in a Regional Land Transport Plan (RLTP) Submission, which the primary document is guiding integrated land transport planning and investment within the three unitary councils of Marlborough District Council (MDC), Nelson City Council (NCC) and Tasman District Council (TDC). It states that, “each of the councils are required to create a RLTP as part of their requirements of regional council under the Land Transport Management Act 2008 (LTMA)”. It has been noted by the Road Transport Association of NZ, that the three councils have created a joint RLTP that recognises the high interdependency and separation from other parts of the South Island collectively known as Te Tauih u o Te Waka-a-Māui (Te Tauihu) or the “Top of the South Island”.

SUBMISSION.

The Road Transport Association of New Zealand (RTANZ) believe that it is our responsibility, not only to support the Councils, General Public, and other Transport Users, in ensuring that all Public Transport, Roading Infrastructure and Road Safety Features, are fit for purpose, it is also responsible to ensure our Commercial Heavy Vehicle road users, are also given consideration as to their health and safety requirements, which is often overlooked. Making changes for one sector of the community, thinking that this is ok, does not necessarily mean it is ok for others, who make their living utilising the infrastructure, but also having to change their cost structure around meeting these changes, even when it is out of their control.
The RTANZ acknowledges the Marlborough District Council’s Long term 10-year plan (LTP) Consultation Document, has been prepared and approved by the Marlborough District Council in consultation with the public. We have also considered the evidence and discussion on the key problems and issues, the strategic response, and the activities that respond to the identified problems.

The main points raised in the Long-Term Plan are as follows with our responses below:

- Marlborough Roads is seeing significant traffic growth and will undertake a comprehensive transport study over the next two to three years. It is likely this study will result in recommendations requiring future community input and budgeting.
  
a. The Transport Industry also see significant growth within the Region with the Grape Industry providing a huge economic potential for years to come. Obviously, the Heavy Transport Industry play a massive role with the harvesting period, which put the roading infrastructure under pressure. However, without the industries input and perhaps some clear directions on requirements, it could increase any budget allocated towards roading unnecessarily.

- Marlborough Roads is fielding more requests for dust suppressant and seal extensions, particularly to deal with dust from logging trucks. Dust suppressant is currently funded from unsealed roads budgets. Seal extensions are seen as a level of service increase where the area of benefit is expected to contribute. It is unlikely that all this work can continue without a budget increase.
  
a. We understand the community’s concerns around dust and wanting seal extensions due to the variation of heavy vehicle travelling through the Region. Perhaps discussions need to be held with the industry to work through some solutions or devise strategy on how the industry could assist.

- Innovating Streets proposal would fund CBD improvements in Picton and Blenheim to enhance the community and visitor experience. The $821,600 project in Blenheim could be funded from existing budgets, and $960,250 for Picton would be funded from Forestry and Land Development Reserve. This proposal builds on plans developed as part of Waka Kotahi NZTA’s urban improvement initiative, an economic stimulus response to Covid-19. There is no rating impact.
  
a. The Transport Industry have experienced many Innovative Street proposal in other districts, that are already utilised budgets for this program. In our experience the heavy haulage and heavy transport sector have not been given any consideration. This has proven to be both unsafe for our drivers and difficult for their vehicle to manoeuvre through some of the newly built barriers projecting into the road. We would like to take the opportunity to work with your developers to provide some of our experiences and also support to ensure it works for all modes of transport.

The Road Transport Association of New Zealand, on behalf of its members within the Marlborough District, needs to support the public’s decision on what options the public chose within each identified above choices, as they will deem what is both efficient and effective, to suit the regions environment. So, we cannot identify in this submission any particular choice or options as they do not reflect the requirement of the transport Industry.
Minimizing Impact on the Transport Sector.

We have looked at the Marlborough LTP and overall feel that, although much work has been put into this from a regional, public, and local body perspective, both the transport and heavy transport sector has been overlooked when it comes to investing in the infrastructure, as there is no clear definition around roading infrastructure proposals. We note a mention in the plan under Infrastructure, that Marlborough Roads are considering sealing so roads due to the logging truck usage. There is always an assumption that we can just fit in, where other transportation models go, but this is not the case. Without consultation with heavy truck operators, understanding what their issues are, then in the long term, the plan could come across some important problems, that may need to be addressed within the very near future. Minimising Transport Operators ability to carrying out their business, with the ability to also support road safety benefits for other uses, has be well supported by the industry, however the Long-Term Plan needs to address all sectors fairly, without too much of an impact.

Summary.

To summarise this Submission the Road Transport Association, support our members as follows:

1. **Overall, we can support the Marlborough District Councils LTP, but can identify that there may be several issues of concern, from a heavy transports point of view, that could have been overlooked.**
2. **We see the purpose of the LTP and its projects and support them all in principle but cannot determine the funding methodology.**
3. **We also support options that will make travelling safer and perhaps utilising intersection signalling devices.**
4. **The Road Transport Association would support a review in looking at other option and where Heavy Transport Vehicles, would not impose a problem to the community.**

This submission is to support all our Transport Operators, in their quest to retain the right to carry out their business efficiently and continue to keep their rights to use the roads to and from their business safely.

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