



SUBMISSION ON AUCKLAND COUNCIL'S DRAFT REGIONAL FUEL TAX AND DRAFT REGIONAL LAND TRANSPORT PLAN

TO: AUCKLAND COUNCIL

SUBMISSION ON: DRAFT REGIONAL FUEL TAX AND DRAFT REGIONAL LAND TRANSPORT PLAN

NAME: HORTICULTURE NEW ZEALAND

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1. Horticulture New Zealand's (Horticulture NZ) submits generally in support of the Draft Regional Fuel Tax (RFT) and Draft Regional Land Transport Plan (RLTP)

2. Background to HortNZ:

Horticulture New Zealand was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.

The horticulture industry value is \$5.6 billion and is broken down as follows:

Industry value		\$5.6bn
Fruit exports	\$2.81bn	
Vegetable exports	\$615m	
Total exports		\$3.4bn
Fruit domestic	\$960m	
Vegetable domestic	\$1.26bn	
Total domestic		\$2.2bn

The benefits associated with horticultural production extend beyond the economic. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

With New Zealand's increasing population, domestic food supply is an issue that HortNZ is concerned about nationally. HortNZ have recently released a report¹ on domestic vegetable production in New Zealand to help educate and inform New Zealanders of this issue.

While the ability to transport chilled fruit and vegetables has reduced reliance on locally-grown produce, it also creates risk if distribution channels are unexpectedly altered. For example, a blocked highway from congestion or significant rainfall could restrict access between fruit and vegetable hubs and their markets. Therefore, HortNZ consider planning for reliable and efficient Transport networks to be a high priority.

3. Horticulture in Auckland

Auckland is critical to New Zealand's food supply, producing a significant proportion of the nation's onions, tomatoes and potatoes. In 2016, Auckland produced for regional and national supply:¹

- 39% of New Zealand's tomatoes
- 33% of New Zealand's cabbages
- 32% of New Zealand's lettuce
- 25% of New Zealand's broccoli and cauliflower
- 19% of New Zealand's potatoes.

Pukekohe contains most of Auckland's versatile land for production. There are a number contributing factors to this versatility including high quality soil, water, frost free climate, shelter, access to labour, transport and markets.

The north facing, frost free areas of Pukekohe provide a productive advantage which supports year-round vegetable production. Because of this, Pukekohe is the sole supplier to the rest of New Zealand for certain vegetables (such as potatoes and lettuce) throughout the year.

There are also a number of fruit growers in South Auckland and a number of large glasshouse operations and organic fruit orchards in the north and north-west of Auckland.

4. Comments relating to the draft RFT and RLTP feedback form:

Question 1: The proposed RFT

HortNZ generally supports the:

- use of pricing mechanisms to provide the necessary infrastructure to address Auckland's traffic issues.
- proposed 11.5 cents (including GST) per litre, subject to exemption of on-farm horticultural vehicles and machines.
- Councils advocacy to government on rebates for petrol and diesel purchased for off-road purposes.

We have lodged a submission on the Land Transport Management (Regional Fuel Tax) Amendment Bill (RFT Bill). A copy of that submission is attached and is considered to form part of this submission.

Key matters raised in that submission include:

¹ New Zealand domestic vegetable production: the growing story. Horticulture New Zealand, 2017.

- HortNZ queries whether a regional fuel tax (RFT) is the most equitable or effective approach. We suggest a range of mechanisms should be investigated and applied. This could include tolling of existing and new roads, and the use of technology such as electronic Road User Charges (RUC).
- HortNZ would oppose the RFT Bill should on-farm horticultural machinery and vehicles not be exempt. We recommend that exemptions should be based on the existing rebate mechanism used for RUC.
- HortNZ is concerned at the lack of clarity around the rebate process. Burdensome record keeping requirements are likely to result in significant administration costs. Administrative costs would be further escalated if on-farm horticultural machinery and vehicles are not exempt.

Question 2: RFT priority projects

The top funding priorities from a HortNZ perspective are as follows:

- *Project 8: Road safety*

HortNZ supports the recognition given to addressing safety issues, particularly on rural roads. Urban traffic travels at high speed on rural roads more commonly used by slower moving rural vehicles such as tractors. This results in unsafe road behaviour and raises safety issues for rural workers.

HortNZ encourages Auckland Transport to include local businesses and communities in determining appropriate traffic safety design. Increasingly around Pukekohe, traffic calming and control measures do not consider rural needs. For instance, the size and location of many roundabouts are hindering truck movements, not adequately target problem areas and simply adding to Auckland's overall traffic challenges.

- *Project 11: Mill Road Corridor*

HortNZ supports the prioritisation of this project. However, greater priority should be given to identifying and securing an alternative route for the southern portion. Particularly connecting Pukekohe and Drury to Manukau. This work is currently unfunded in the draft RLTP.

This is a critical route for Pukekohe based horticultural operations to connect to State Highway 1 (SH1) and to Manukau. Current congestion levels are already impacting truck movements on and off the route and causing significant time delays in the delivery of fresh fruit and vegetables to market.

One local horticultural business estimates congestion in this area results in a weekly \$10,000 loss. This business has had to impose a 15% congestion charge on their container operation. The issue is compounded by regular closure of the motorway at night for roadworks. The existing alternative route significantly increases time taken to reach the final destination.

Securing the southern portion of the Mill Road corridor aligns with the development strategy in the draft Auckland Plan 2050, the RLTP objectives and complements Project 14 of the RFT. It will achieve a range of strategic outcomes relating to:

- road safety
- improving freight movement,
- alleviating congestion

- being value for money
- ensuring the future growth areas of Pukekohe and Drury have adequate infrastructure prior to development.

- *Project 13: Network Capacity and Performance Improvements*

The implementation of freight priority on key freight connections is listed as a key initiative in the RFT. Freight movement is identified as a key challenge in the draft RLTP. However, neither plan provides detail on proposed initiatives or how key freight connections are identified.

HortNZ supports the intention of this initiative but is interested in understanding more detail to ascertain whether proposed initiatives are likely to be efficient and are targeted to key connections for horticulture.

HortNZ identifies the following as key freight connections for Auckland based horticulture industry:

- Pukekohe/Drury to SH1
- Pukekohe/Drury to Manukau
- Kingseat Road, Patumahoe
- Warkworth to Manukau
- Kumeu to Manukau.

- *Project 14: Growth related transport infrastructure*

HortNZ supports prioritising funding to growth areas, specifically Pukekohe, Drury, Paerata, Kumeu and Warkworth.

We believe that provision of arterial connections around Pukekohe should be prioritised. This would assist in diverting trucks from the town centre which would align with objectives around road safety, improving freight movement and alleviating congestion.

HortNZ identifies the following projects as contributing to this RFT project:

Question 3: Auckland's transport challenges

HortNZ supports the challenges identified in the draft RLTP including:

- Road safety
- Congestion
- Freight movements
- Accessibility
- Environment and sustainability of infrastructure

Question 4: RLTP funding areas:

HortNZ generally supports the overall funding areas and projects identified in the RLTP.

HortNZ believes the following listed unfunded projects should be given priority for funding.

These projects will contribute significantly in addressing a number of issues including road safety, improved freight movement and accessibility (being improved access around Auckland, and access to fresh, affordable food):

Pukekohe Outer ring freight route improvements

- The plans do not provide any detail on what this project entails. HortNZ would support an arterial connection linking Paerata to Tuakau via Heights Road – Gun Club Road – Patamahoe Road – Waiuku Road – Attwells Road.
- Some of Pukekohe's based horticultural operations generate over 200 vehicle movements per day. The increase of urban traffic moving at high speed on these rural roads poses significant safety issues. It also compounds congestion issues with conflict between urban, rural and freight traffic along these routes
- This project aligns with improving freight movements and addressing road safety. It would successfully remove truck movements through Pukekohe town centre.

Waiuku Rd/Stuart Rd intersection improvements

- Several large scale horticultural operations are located in this area. These operations distribute both nationally and internationally. Accordingly, this is a key freight point for the horticultural sector.
- The layout of the road and intersection obstructs visibility for vehicles turning into or out of Stuart Road and for vehicles travelling east along Waiuku Road.
- The proximity to Pukekohe residential areas has also compounded traffic and safety issues. For instance, increased urban traffic travelling at speed on an already unsafe road and new road designs that do not accommodate rural vehicle needs (including trucks) but there is no safe, direct alternative.

SH22 Drury to Pukekohe Safe System Enhancement

- HortNZ supports provision of safety measures along this route, particularly given the increase conflict between urban, rural and freight traffic. HortNZ notes that in allocating funding for this project, careful consideration should be had in balancing short-term, quick-fix safety measures, and long-term prevention safety measures such as providing an alternative route.

HortNZ supports those projects identified for funding in the New Zealand Transport Authority (NZTA) investment programme. Specifically, the following projects are key freight corridors for the horticultural sector:

- SH1 Puhoi to Warkworth
- Southern Corridor Improvements
- SH1 South, Papakura to Bombay improvements

Question 5: Additional projects

HortNZ believes the following projects align with the outcomes sought in the draft RFT and RLTP and should be prioritised for funding:

Mill Road Corridor, Southern section

- HortNZ supports funding to investigate an alternative route and for acquisition and construction of the route. Discussion on this is detailed above.

Mill Road, Bombay road safety improvements

- This intersection encounters large traffic volumes and a number of conflicts between traffic exiting SH1, traffic turning in and out of the services stations and truck movements from large-scale horticultural operations.
- On December 16th 2017, 25 vehicles were counted turning into private driveways within a 16 min interval i.e. less than 40 seconds apart on average. Queues to turn right coming out of the service centre are regularly 15-20 vehicles. At the busiest times, it has been observed that the service centre can have vehicles queued from the Mill Rd entry to the exit. Video footage of these events can be made available on request.
- This traffic not only results in significant delays to truck delivery, it also poses serious safety issues. The location of the service stations will continue to encourage high traffic volumes, which is likely to increase with urban development.
- Prioritising this area for road safety and traffic calming measures aligns with the objectives of the RFLTP and fits within the projects listed for RFT contribution.

Southern freight rail hub – freight initiative options:

- A long-term solution to improving freight movements and alleviating congestion could include development of a freight rail hub in the Franklin area. The majority of Auckland's horticultural export is destined for the Tauranga Port via being trucked to the Onehunga rail hub.
- The local horticultural industry is willing to be a party to conversations around freight initiatives as a significant contributor to freight movements.

Thank you for the opportunity to submit.

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Dated: 14 May 2018

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