

Draft Regional Freight Plan 2011

Summary of submissions, officer responses and recommendations

#	Submitter	Point	Officer response and suggested change
1	Diane Benge	Opposes the introduction of over-weight over-dimension vehicles.	<p>Response: The NZ Transport Agency has conducted studies estimating the potential effects of HPMV introduction which have noted several benefits improving the efficiency of road. An economic impact assessment has not yet been completed for the Wellington region. Your submission has been forwarded to the NZ Transport Agency.</p> <p>Recommendation: No change.</p>
		Supports rail freight, believing it to be a far more environmentally sound and socially sustainable means of freight movement by improving road safety and reducing noise, pollution and vibration for residents near major roads.	<p>Response: Increasing the amount of freight carried by rail is one of the major components of KiwiRail's Turnaround Plan.</p> <p>Recommendation: No change.</p>
2	Mark Laurent	Opposes the proposed expressway and the oversized trucks that are intended to be allowed to use it.	<p>Response: The NZ Transport Agency has conducted studies estimating the potential effects of HPMV introduction which have noted several benefits improving the efficiency of road. An economic impact assessment has not yet been completed for the Wellington region. Your submission has been forwarded to the NZ Transport Agency.</p> <p>Recommendation: No change.</p>
		Supports increased use of trains to carry freight.	<p>Response: Increasing the amount of freight carried by rail is one of the major components of KiwiRail's Turnaround Plan.</p> <p>Recommendation: No change.</p>

3	Public Transport Voice	<p>The introductory section should include a statement on the negative aspects of freight movements:</p> <p>“Freight movements can also create significant impacts, for example through the contribution of trucks to road crashes and congestion, and the noise and vibration impacts created by trucks and freight trains. Freight movements are also major contributors to the emission of greenhouse gas emissions.”</p>	<p>Response: Disagree that trucks are significant contributors to road crashes as Figure 19 in the Background Report suggests otherwise. There is no readily available information on the freight sector’s contribution to New Zealand’s greenhouse gas emissions profile, so identifying freight as a ‘major contributor’ cannot be justified at this time.</p> <p>The ‘Future Freight Solutions’ report by the New Zealand Business Council for Sustainable Development stated that the Ministry for the Environment has calculated that public transport and freight transport combined equates to about 12% of total New Zealand emissions (or 60% of transport emissions).</p> <p>Recommendation: Add a paragraph on general issues caused by freight to the ‘Freight issues and opportunities’ section along the lines of:</p> <p>“Freight movements can also impact communities along freight routes by contributing to congestion during peak times, as well as noise and vibration effects. Like other vehicles, freight movements are also contributors to greenhouse gas emissions.”</p>
		<p>Disputes that the ‘Role of freight’ section accurately represents the potential roles of rail freight noting that rail freight is increasingly handling goods over short distances and non-massed/non-bulk goods.</p> <p>The ‘Role of freight’ section should clearly set out what role Greater Wellington would like each mode to play, not just describe current reality.</p>	<p>Response: Agree that the role of rail freight could be further clarified. Greater Wellington supports KiwiRail Freight’s description of the services they provide.</p> <p>KiwiRail Freight’s description of their competitive advantage in the KiwiRail 2010 Annual Report provides a clear and concise description of the role of rail freight.</p> <p>Recommendation: Change to:</p> <p>“Rail freight primarily handles the movement of bulk commodities, containerised goods to and from ports, long distance containerised goods between major</p>

			<p>cities and short distance freight shuttles between inland ports and wharves.”</p>
		<p>Add an additional trend: “Increased focus on moving freight between road and rail, for example through the use of inland ports.”</p>	<p>Response: The trend for inland ports is covered by ‘centralised distribution centres’ in the first bullet point. The latest available planning assumption in the 2008 National Freight Demand Study is that rail retains its current mode share of freight. While there are several anecdotal reports of businesses looking into rail options, there is currently no evidence to suggest that the mode share of rail freight is increasing relative to the other modes. Recommendation: No change.</p>
		<p>Notes that the Mackays to Peka Peka Expressway is not in the Western Corridor Plan which still contains Western Link Road. Greater Wellington has a statutory plan that must be quoted and promoted until it is changed.</p>	<p>Response: The Western Corridor Plan is not a statutory document. While the draft Freight Plan mentions the Western Link Road (as identified in the Western Corridor Plan), the table on page 7 reflects the current situation in that corridor. The Mackays to Peka Peka Expressway is an identified part of the Levin to Wellington Airport Road of National Significance. The RoNS concept is laid out in the Government Policy Statement on land transport funding 2009/10 – 2018/19 which the Wellington Regional Land Transport Strategy (and therefore its subsidiary plans) is required to take into account and of which the NZ Transport Agency is required to give effect. Recommendation: Add the corridor plans’ approval years in the table heading.</p>
		<p>Change the first action, ‘Integrate planning processes’, to read: “Support the implementation of projects that will benefit the overall freight system, consistent with the role of freight modes set out in this plan.”</p>	<p>Response: The purpose of this action is to indicate that projects identified in the four corridor plans which have significant freight benefits will be supported as such. This action is related to the ‘Freight projects’ table beginning on page 7 of the draft Freight Plan. The relative overall</p>

		<p>A project that benefits freight but provides a net dis-benefit to the region should not be supported.</p>	<p>benefits and costs to the region of these other projects are analysed during the individual corridor plan development processes as well as during the investigation and design phases of the individual projects.</p> <p>This can be made clearer in the text of the action.</p> <p>Recommendation: Change to: “Support the implementation of projects in the Corridor Plans identified as having significant freight benefits.”</p>
		<p>The ‘Improve road freight reliability’ project should be changed to read:</p> <p>“Ensure that changes to and management of the State Highway network improve efficiency of the overall freight system, while reducing its impacts on the environment, communities and other road users.”</p> <p>This should be a goal for any state highway project, not just any RoNS projects that proceed, and should not be focused just on the efficient movement of freight.</p>	<p>Response: Agree that the action should be expanded to include all state highway projects as well as the relevant local roads as they become the subject of HPMV permit applications and at the discretion of the NZ Transport Agency and other road controlling authorities.</p> <p>The scope of the draft Freight Plan is on the efficient movement of freight. Wider concerns are outlined in the Regional Land Transport Strategy 2010–40 and are analysed during corridor plan development processes as well as investigation and design phases of individual projects.</p> <p>Recommendation: Change action to: “Ensure the design of state highway and local road (when deemed necessary by the parties involved) projects facilitate the efficient movement of freight, including provision for over-dimension and over-weight vehicles.”</p> <p>Change ‘Responsibility’ column to read: NZTA (lead), TAs.</p> <p>Change the target/measure to ‘State highways and relevant local roads are designed to accommodate HPMVs”</p>
		<p>The ‘Increase road freight efficiency’ action should be</p>	<p>Response: This purpose of this and the ‘Facilitate</p>

		<p>changed to read:</p> <p>“Increase freight efficiency - Identify the best means to increase the overall efficiency of the freight system, including improving fuel efficiency of vehicles, optimising the mode used for freight, and removing barriers to efficient freight.</p> <p>Responsibility - NZTA (lead), GWRC</p> <p>Target/measure - Full suite of options identified and consulted, preferred options implemented”</p> <p>The next action should be deleted, as it is incorporated in the above.</p>	<p>introduction of HPMVs’ actions are to describe the NZ Transport Agency’s High Productivity Motor Vehicle permitting process – the intention of which is to increase road freight efficiency. As the HPMV project is a discreet NZ Transport Agency project, there are discreet actions in the draft Freight Plan. The HPMV studies are a separate action because the intended timing to complete them is 2012, while the HPMV permitting process is ongoing.</p> <p>The Ministry of Transport is undertaking the ‘Understanding Transport Costs and Charges’ research project, part of which deals with improving the efficiency of overall freight movements.</p> <p>Recommendation: No change.</p>
		<p>Notes that HPMVs may cut costs for truck companies, but are far less likely to improve overall economic efficiency and are instead likely to reduce the optimal modal spread of freight, and impose massive costs on communities.</p> <p>HPMVs should be looked at in a balanced way along with other options and only used when shown to be the best way to increase overall efficiency of the freight system.</p>	<p>Response: The NZ Transport Agency has conducted studies estimating the potential effects of HPMV introduction which have noted several benefits from more advanced vehicle technology (ie. improved brakes), less mechanical noise and lower carbon emissions from improved engine efficiencies and fewer vehicles on the road. An economic impact assessment has not yet been completed for the Wellington region.</p> <p>The decision to use an over-weight or over-dimension vehicle is made by individual freight carriers based on their unique circumstances. The NZ Transport Agency administers the service to the freight carriers that permits the use of HPMVs based on the condition of the intended route as well as other conditional factors. NZTA does not decide if the freight carrier’s operations would be better handled by another transport mode.</p> <p>Currently, there is no legislative framework or adequate available data to determine what an ‘optimal’ freight mode share would be. While the pace of infrastructure</p>

			<p>investment and the rules on how infrastructure is used is set by Central Government policy, actual freight mode share is determined in a competitive market that is subject to numerous factors. Public sector infrastructure providers have their own investment plans to increase carrying capacity of their respective modes in cooperation with the private sector in order to cope with predicted increases in freight demand.</p> <p>Recommendation: No change.</p>
		<p>The 'Improve Port Access' action should be amended by replacing "RoNS project" with "project in the Ngauranga to Airport Corridor Plan". Only the Corridor Plan has been approved. RONS is a concept not an approved plan.</p>	<p>Response: The Ngauranga to Aotea RoNS project is part of the agreed Ngauranga to Wellington Airport Corridor Plan. It is currently in the investigation phase and the Wellington Port Access Concept Plan is timed specifically to be incorporated in that investigation process.</p> <p>Recommendation: Change the 'Improve port access' action to: "Ngauranga to Aotea RoNS project in the Ngauranga to Wellington Airport Corridor Plan."</p>
		<p>The 'Retain rail options' action should be changed to read "Investigate and implement options..." otherwise the target doesn't make sense.</p>	<p>Response: Agree.</p> <p>Recommendation: Change action to: "Investigate and implement any resulting options to retain the North Wairarapa Rail line..."</p>
		<p>Strongly supports the 'Provide for expected port freight growth' action, particularly the development of inland ports. But the target should be options investigated and desirable options implemented.</p>	<p>Response: It is uncertain if further inland port options will be required. Since the action is to 'investigate' options and the timing is 'ongoing', the target measure is to have these options investigated. Individual projects that come from these investigations are likely to be included in future freight plans if multiple parties are responsible for the actions, or be provided for in CentrePort's internal business planning.</p>

			<p>Recommendation: Change action to: "Investigate options for:</p> <ul style="list-style-type: none"> • Inland port facilities • Appropriate transport connections • Providing more efficient use of port land <p>to provide a basis for projects to continue provision for freight growth when necessary."</p>
		<p>In the 'Improve knowledge...' action wording, the word "improve" is missing in the text</p>	<p>Response: Agree. Recommendation: Change text to: "Investigate local road usage by Heavy Commercial Vehicles and Light Commercial Vehicles to improve knowledge freight supply chains and requirements..."</p>
4	Biana Begovich	<p>Supports fuel efficiency improvements, improving driver training and work conditions for the safe and efficient movement of freight</p>	<p>Response: Noted. Recommendation: No change requested.</p>
		<p>Opposes the introduction of over-weight, over-dimension vehicles because it is a short-term solution for freight movement in light of the probability of peak oil capacity and is inconsistent with the RLTS vision of an "environmentally and socially sustainable" land transport network.</p>	<p>Response: Disagree that HPMVs are inconsistent with the Wellington RLTS. RLTS policy 8.1.w states that Greater Wellington will "ensure that key regional freight routes are developed in a way that facilitates efficient movement of freight, including provision for over-dimension and over-weight vehicles where appropriate". Your submission has been forwarded to the NZ Transport Agency, which is implementing this policy. Recommendation: No change.</p>
		<p>Supports retaining and improving a rail option to move freight including:</p> <ul style="list-style-type: none"> • Improvements to existing rail lines especially the North Island Main Truck • Improving access to CentrePort and the Ferry terminal 	<p>Response: Noted. Recommendation: No change requested.</p>

		<ul style="list-style-type: none"> • Maintaining the north Wairarapa rail line • Protection of the Gracefield/Seaview rail corridor • Supporting the KiwiRail 'turnaround' plan 	
5	Wellington Employers' Chamber of Commerce	Generally support the Draft Plan.	<p>Response: Noted.</p> <p>Recommendation: No change requested.</p>
		Advocates for better use of policy tools such as congestion and road pricing and encourages Greater Wellington to use them where possible and/or lobby government for their introduction.	<p>Response: Advocacy for congestion and road pricing policy tools are part of Wellington RLTS policy 8.6.b.</p> <p>Recommendation: No change.</p>
		<p>In terms of roading investment, our priorities for freight are:</p> <ul style="list-style-type: none"> • the Wellington Road of National Significance • the Grenada to Gracefield Road • Continuing improvement on the link to the Wairarapa 	<p>Response: Noted.</p> <p>Recommendation: No change requested.</p>
		Pleased the draft Plan is mode neutral and notes road, rail, air and sea freight all have a role depending on their strengths and weaknesses, the product shifted; and that the market is best able to determine what mode is best.	<p>Response: Noted.</p> <p>Recommendation: No change requested.</p>
		Thinks there is a heavy under emphasis on the potential of coastal shipping.	<p>Response: The draft Freight Plan primarily deals with coastal shipping via actions on improving access to ports and increasing port capacity. However, it is agreed that the description of sea freight in the 'Role of freight' section requires updating.</p> <p>Recommendation: Delete coastal shipping sentence in the 'Role of freight' section and add the following paragraph:</p> <p>"Domestic sea freight is broadly split into three different categories: ferry, coastal, and trans-shipments. Ferry services in Wellington run back and forth repeatedly between Wellington and Picton. Coastal shipping carries domestic freight on routes</p>

			<p>between multiple New Zealand ports. Trans-shipments carry international-bound freight from a New Zealand port to an intermediate New Zealand port before being loaded onto an international container vessel.”</p>
		<p>Thinks there is too much emphasis on the rising cost of fuel. Fuel prices are cyclical and policy should take this into account. While peak oil is a credible possibility and prices are likely to trend upwards over time, alternate fuel sources are evident and proven and other technological advances are likely. Furthermore, fuel is only one component of freight cost and road transport has greatly improved fuel and loaded kilometre efficiency over recent years.</p>	<p>Response: There is considerable uncertainty around the rate of alternative fuels market penetration as well as New Zealand private and freight vehicle fleet turnover that would put downward pressure on fuel prices.</p> <p>Recommendation: No change.</p>
		<p>The Emissions Trading Scheme is overemphasised, this has been in place since July 2010 and has resulted in fuel price increases of 2-3c a litre which is small relative to other government charges, normal fuel price fluctuations and overall freight costs.</p>	<p>Response: Currently, the five main petrol and diesel suppliers in New Zealand purchase credits through the Emissions Trading Scheme at a fixed price of \$12.50 per unit which results in a 2-3 cent/litre price increase. After 2012 the cost of credits for these mandatory participants will become fully market-driven which will have uncertain impacts on the price of fuel for freight carriers.</p> <p>Recommendation: No change.</p>
		<p>Notes that improving access to the port and airport is essential and anticipates the upcoming Wellington Port Access Concept Plan. The increased airfreight is yet another factor reinforcing the need for transport investment between the Basin Reserve and the airport.</p>	<p>Response: Noted.</p> <p>Recommendation: No change requested.</p>
		<p>Regards efficient interconnection of the region as important but the potential of the North Wairarapa line for freight movements is far from clear. In any case this is a decision for KiwiRail and its government owner and we are unsure why Greater Wellington gives itself lead</p>	<p>Response: Greater Wellington is leading a study of log freight and potential usage of the North Wairarapa Rail line.</p> <p>Recommendation: No change.</p>

		responsibility for this initiative.	
		Sees merit in the protection of Gracefield / Seaview rail corridor as it is likely to be in the commercial interests of KiwiRail as well as the public interest of the community as a whole. Recommends caution in advocating for its protection.	Response: Noted. Recommendation: No change requested.
		Asks if the proposed freight matrix model update should be funded by NZ Transport Agency and not Greater Wellington.	Response: The actions table does not specifically identify funders, only the organisation with lead responsibility in implementing an action. The funding request for the model upgrade is anticipated to be part of the next Regional Land Transport Programme. Recommendation: No change.
		Notes no mention of loading zones in the draft Plan and sees merit in reviewing policies around loading zones, particularly in the CBD.	Response: Regulations on loading zones is part of the 'Improve knowledge of freight supply chains and requirements' action. Recommendation: No change.
		Notes a lot of data on freight volumes but freight value is a better measure for assessing the economic merits.	Response: Information on the value of freight moving through New Zealand is not readily available. The Transport Monitoring Indicator Framework does not have data on the value of domestic freight (indicator FT006). Recommendation: No change.
6	Carterton District Council	The Carterton District Council expresses overall support for the draft regional freight plan. In particular, the Council notes the inclusion of references to planned intersection improvements on State Highway 2 at Norfolk Road and encouragement for the development of a log transfer and storage site at Waingawa. The Council is also very supportive of any initiatives to retain the North Wairarapa Rail line beyond Masterton.	Response: Noted. Recommendation: No change requested.

7	Masterton District Council	<p>Councillors were supportive of the draft plan and had no significant concern with what was proposed.</p>	<p>Response: Noted. Recommendation: No change requested.</p>
		<p>Councillors requested officers to reinforce the key issues for the Wairarapa by way of submission to the draft. In particular:</p> <ul style="list-style-type: none"> • Emphasising further potential for rail in Wairarapa and advocating for the rail log freight study • Seeking specific reference to the freight opportunity offered by an inland port at Waingawa • Investigating potential log freight from Wairarapa to the Port of Napier via road and/or the North Wairarapa rail line • Recognising the importance of the Pahiatua Track as a freight route to Wairarapa • Noting Council's intention to review freight volume forecasts and investigate potential routes for an eastern bypass of the town 	<p>Response: Greater Wellington notes the issues of particular interest and Masterton District Council's intention to review freight volume forecasts and potential routes. Recommendation: No change requested.</p>
8	Horizons Regional Council	<p>Reaffirms opportunities for greater freight efficiencies between the two regions in light of the Wellington RoNS project and KiwiRail's Turnaround Plan, particularly between major freight handling nodes such as CentrePort and the developing inland ports in the Horizons region.</p>	<p>Response: Noted. Recommendation: No change requested.</p>
		<p>Reaffirms support to retain the Northern Wairarapa rail line so it can be future proofed for the possibility of increased use, most likely from logging opportunities in the next 10-20 years.</p> <p>As the North Wairarapa Line terminates at Woodville, it is suggested that Horizons Regional Council and Tararua District Council be included as agencies responsible as part of this investigation.</p>	<p>Response: Agreed that Horizons and Tararua District Council should be included as responsible agencies. Recommendation: Amend the 'Responsibility' column for the 'Retain rail options' action to include Horizons Regional Council and Tararua District Council.</p>

		Supports the proposal for a log transfer and storage site at Waingawa as it is likely that some of the demand to use this facility would be from within the Horizons region, particularly from the Tararua District.	Response: Noted. Recommendation: No change requested.
9	Kylie Gamble	Supports the North Wairarapa Rail Line to remain operational and invested in. This is vital as a long term option for freight movement and as an alternate emergency route. Whilst it may be not as economically viable as other lines, with peak oil and a growing population it is critical to the economic growth of our country for the future.	Response: Noted. Recommendation: No change requested.
		Supports improvements on the Pukerua Bay to Paekakariki Line as this has made the trains more efficient and reliable. Larger containers will now be able to use this line removing some of the heavy logging trucks etc from the roads. Supports the building of more train carriages to ease congestion on passenger services, particularly if carriages are built in Petone.	Response: Noted. Improvements to rail passenger services are part of the Regional Public Transport Plan review and the Regional Rail Plan. Your submission has been noted with regard to these Plans. Recommendation: No change requested.
		Opposes the Grenada to Gracefield link and prefers the funds spent on upgrading and investment in the rail system to reduce the amount of commuters on the road.	Response: Noted. Increasing the amount of freight carried by rail is one of the major components of KiwiRail's Turnaround Plan. Recommendation: No change.
		Opposes High Productivity Motor Vehicles as a short sighted solution due to road congestion and peak oil. Most freight should be moved by train, and encouraged to do so by subsidised rates. Investment in rail should be the number one priority	Response: Noted. Your submission has been forwarded to the NZ Transport Agency, which is implementing this policy. Recommendation: No change.
		Pukerua Bay Expressway bypassing Pukerua Bay is essential.	Response: Noted. Your submission has been forwarded to the NZ Transport Agency.

			Recommendation: No change.
10	New Zealand Transport Agency	Notes some specifics on what the key destinations are for the targets in the 'Strategic context' section would be useful.	Response: The outcomes and targets table provides a reference to the RLTS. The target in question (4.2) is purposely vague in order to not prescribe changes to monitoring methodologies. Recommendation: No change.
		Notes that for targets 4.1 and 4.2 it would be useful to identify when congestion delay measurements occurred	Response: This information is contained in the 'Annual Monitoring Report on the RLTS' as well as the Freight Plan Background Report. Recommendation: No change.
		Notes RLTS outcome 6.3 is acceptable to NZTA given that there is no adverse impact on economic growth	Response: Noted. Recommendation: No change requested.
		Suggests a reference to Horizon's RLTS and their implementation plans in order to note the importance of freight links to the north of the Wellington region.	Response: Agree. Recommendation: Add a paragraph to the 'Key changes in the freight sector' section along the lines of: "Horizons Regional Council's RLTS contains provisions to promote Palmerston North as a freight hub and distribution centre for the lower North Island. Hutt City Council also has vision for the Seaview Gracefield area that includes freight storage and the Wairarapa Corridor Plan contains actions supporting a log transfer and storage site at Waingawa."
		Notes it is important to show the scale of airfreight in relation to other inter-regional freight movements and suggests adding airfreight to the chart on page 4.	Response: The chart on page 4 does not depict the scale, or volume, of freight by mode. It is an index that shows how the amount each mode carries has changed relative to the amount each mode carried in 2003. Recommendation: No change.
		HPMVs are overemphasised in the 'Key changes' section,	Response: Agree.

		<p>noting that operator changes in port access, growth in centralised distribution hubs as well as pricing and information availability will have a larger effect.</p>	<p>Recommendation: Add another bullet point to the 'Key changes...' section along the lines of: "Introduction of high productivity motor vehicles (HPMV) changing the composition of the New Zealand truck fleet."</p>
		<p>Suggests clarifying text that over length HPMVs have as of right access while over weight HPMVs require permits.</p>	<p>Response: Agree. Recommendation: Change 'Key changes...' section to delete HPMV paragraphs and add the following: "HPMVs are combinations of truck configurations which exceed the standard 44 tonne gross vehicle mass and 20 (or sometimes 22) metres total length. Over-length vehicles have as-of-right access while over-weight ones require permits to operate on routes approved by the NZ Transport Agency for state highways and road controlling authorities for other roads."</p>
		<p>Prefers removal of statement on future local road funding to upgrade to HPMVs.</p>	<p>Response: Local road maintenance is a factor that HPMVs are likely to affect. The wording can be clarified. Recommendation: Change wording to: "The state highways in the region have been cleared for the use of HPMVs and some local roads may or may not need to be improved or require more maintenance to accommodate HPMVs on a case by case basis."</p>
		<p>Increasing exports to alleviate empty running is not brought through to the list of actions. Suggests a more detailed action for this issue could include for total trip scheduling or the issue may be connected to the actions on improving knowledge of freight supply chains to create efficiencies.</p>	<p>Response: Increasing exports is part of the Wellington Regional Strategy. The draft Freight Plan is more concerned with providing the transport capacity to allow an increase to occur. Some clarification is required (in line with CentrePort's comment below).</p>

			<p>Recommendation: Change the 'empty running' section to include:</p> <p>"Growing outbound inter-regional domestic freight and international exports is a major focus of the Wellington Regional Strategy. This is a key opportunity to limiting empty running and improving the efficiency of freight movement."</p>
		The capacity at the airport is low in terms of national and regional freight and suggests putting this in context would be useful in understanding the scale of the issue.	<p>Response: Agree.</p> <p>Recommendation: Add to 'Airport capacity' section:</p> <p>"Wellington International Airport currently handles a low volume of freight and lacks the capacity to handle substantial airfreight growth from wide bodied aircraft and long haul services."</p>
		States that the 'freight initiative' label overstates the 'upgrading Tawa interchange' project and implies it should be removed from this table.	<p>Response: Agree.</p> <p>Recommendation: Remove the 'upgrading Tawa interchange' project from the table.</p>
		Suggests repeating the column headings on the second page of the 'freight initiatives' table.	<p>Response: Agree.</p> <p>Recommendation: Repeat column headings for all tables that go over to another page.</p>
		<p>Notes the target for the 'Improving knowledge of freight supply chains and requirements' action is better suited if completed by the region with input from operators and TAs.</p> <p>Notes as well that this action will also assist with the 'improve freight transport modelling' action.</p>	<p>Response: Agree.</p> <p>Recommendation: Add Greater Wellington as the lead agency responsible.</p> <p>Change the target/measure from 'Reports' to 'Report'.</p>
11	CentrePort	'Role of freight' section underplays importance of coastal shipping.	<p>Response: Agreed.</p> <p>Recommendation: Delete coastal shipping sentence in the 'Role of freight' section and add the following</p>

			<p>paragraph:</p> <p>“Domestic sea freight is broadly split into three different categories: ferry, coastal, and trans-shipments. Ferry services in Wellington run back and forth repeatedly between Wellington and Picton. Coastal shipping carries domestic freight on routes between multiple New Zealand ports. Trans-shipments carry international-bound freight from a New Zealand port to an intermediate New Zealand port before being loaded onto an international container vessel.”</p>
		<p>More up-to-date information required for the ‘How freight moves...’ section. Specifically, the sentence ‘Freight movement at CentrePort and by ferry have recovered to their relative 2008 levels.’</p>	<p>Response: Agree. More up-to-date information is provided in the Freight Background Report and this should be referenced in the Freight Plan text.</p> <p>Recommendation: Add the following to the first paragraph:</p> <p>“More up-to-date information will become available over time through the Ministry of Transport’s Freight Information Gathering System.”</p> <p>Add the following to the sentence mentioned in the comment:</p> <p>“...CentrePort and by ferry have recovered to their relative 2008 levels and continue to increase.”</p>
		<p>Further clarification needed on, “HCVs comprise the vast majority of freight movements in, out and through the Wellington region.” HCVs do not comprise the majority of total freight movements in the region when compared against rail, coastal shipping and international shipping.</p>	<p>Response: It is not known precisely how much freight is carried by HCVs and LCVs respectively. However, road freight comprised a significant majority of freight moved in terms of tonnes kilometres and estimated total tonnage carried according to the latest available statistics.</p> <p>Recommendation: Remove reference to heavy commercial vehicles in the first sentence of the third paragraph in the ‘How freight moves...’ section.</p>

		<p>AADT vehicle counts for HCVs suggest that there is significant variability in demand across the SH1 and SH2 points mentioned. Further specificity is needed.</p>	<p>Response: While there is considerable variability across the whole of SH1 and SH2 in the region, between Paramata and the Terrace Tunnel on SH1 and between SH58 and the Ngauranga Merge only 'SH1 at Ngauranga' registers less than 2,000 heavy vehicles going in both directions.</p> <p>Recommendation: Change the second sentence in the third paragraph of the 'How freight moves...' section to read:</p> <p>"The annual average daily traffic volumes of freight movements on State Highway 1 and 2 vary across the network as trucks turn on and off. SH1 between Paramata and the Terrace Tunnel as well as SH2 between SH58 and the Ngauranga Merge is fairly consistently above 2,000 heavy vehicles – the exception being SH1 at Ngauranga."</p>
		<p>The importance of the Hutt Valley, Seaview and Gracefield areas for warehousing and distribution are severely played down.</p>	<p>Response: Agree to amend text.</p> <p>Recommendation: Change the last sentence of the third paragraph in the 'How freight moves...' section to read:</p>
		<p>SH2 is also important for inter-regional freight because:</p> <p>Wellington's population base, fuel storage area, warehousing and freight forwarding bases are reliant on inter-regional freight and predominantly located in this area</p> <p>Freight that leaves the Hutt Valley/Seaview and travels north on SH1, then this journey is likely that this journey will be inter-regional</p>	<p>"SH1 carries a large majority of inter-regional freight trips both to the North and South. SH2 merges with SH1 and provides access to the industrial, warehousing and distribution areas in the Hutt Valley."</p>
		<p>More up-to-date and accurate data is required for shipping volume, commodities and destinations where CentrePort is concerned.</p>	<p>Response: More up-to-date information is provided in the Freight Background Report. The text in the draft Freight Plan is meant to provide an overall summary. However, the text should be amended to better reflect the Freight Background Report.</p>

			<p>Recommendation: Change fourth paragraph in the 'How freight moves...' section to read:</p> <p>"Domestic freight movement by coastal shipping is significantly less in volume than road and rail nationally, but accounts for about 15% of total freight tonne kilometres. CentrePort's infrastructure enables the movement of approximately 11 million tonnes of freight per annum –only Ports of Auckland and Port Tauranga carry more volume."</p>
		<p>The statement "most of the traffic between the North and South Island is carried on road or rail" needs review because it is impossible for road or rail access over the Cook Strait.</p>	<p>Response: Agree that the text needs to be clarified.</p> <p>Recommendation: Change the final paragraph in the 'How freight moves...' section to read:</p> <p>"Wellington acts as a freight hub, transiting road and rail freight movements between the two islands on ferry services across the Cook Strait or with other vessels between Wellington and Nelson. CentrePort is also a hub for carrying bulk or container freight from other New Zealand ports and rail destinations for domestic coastal shipping purposes or as part of international shipping services. The amount of freight moving through the region from the North is significantly more than that moving through from the South, reflecting the North Island's economic dominance and Ports of Auckland as the primary international import/export port."</p>
		<p>Crucial parts of the arterial transport network have not been cleared for HPMVs which makes it impossible to gain any benefits. In particular, the Seaview/Gracefield areas and the port are not directly accessible from state highways and have arterial roads that have not been cleared for HPMV use.</p>	<p>Response: Agree that some arterial roads are not rated for HPMVs.</p> <p>Recommendation: Change wording to:</p> <p>"The state highways in the region have been cleared for the use of HPMVs and some local roads may or may not need to be improved or require more</p>

			<p>maintenance to accommodate HPMVs on a case by case basis."</p> <p>Change 'Improve road freight reliability' action to: "Ensure the design of state highway and local road (when deemed necessary by the parties involved) projects facilitate the efficient movement of freight, including provision for over-dimension and over-weight vehicles."</p> <p>Change 'Responsibility' column to read: NZTA (lead), TAs.</p> <p>Change the target/measure to 'State highways and relevant local roads are designed to accommodate HPMVs"</p>
		<p>The 'freight efficiency' section concludes that several infrastructure improvements can alleviate these issues. Further explanation is needed to outline what the projects are and how they may provide freight efficiency benefits.</p>	<p>Response: Agree.</p> <p>Recommendation: Change last sentence of 'Freight efficiency' section to read: "Several infrastructure improvement projects (some of which are outlined in the Freight projects table) can alleviate these issues."</p>
		<p>In the 'empty running' paragraph, the term exports needs to be changed. Exports usually refer to goods moved internationally and consistency in terminology is important.</p>	<p>Response: Agree.</p> <p>Recommendation: Change the 'empty running' section to include: "Growing outbound inter-regional domestic freight and international exports is a major focus of the Wellington Regional Strategy. This is a key opportunity to limiting empty running and improving the efficiency of freight movement."</p>
		<p>The 'ferry capacity' and 'port capacity' paragraphs describe issues that the commercial entities of CentrePort and KiwiRail Interislander must solve. The Freight Plan</p>	<p>Response: Agree.</p> <p>Recommendation: Remove "... and this will require</p>

		<p>should support these businesses (such as improving road/rail access to port facilities) and not impose solution on these entities.</p>	<p>expanded terminals and docking areas.”</p>
		<p>It is incorrect to suggest that CentrePort lacks capacity and that this may require the development of offsite freight storage points or inland hubs. Although land cannot be rapidly acquired, there is no lack of space impeding growth nor is lack of space a reason for investing in inland hubs.</p> <p>The ‘port capacity’ paragraph should be reshaped to positively reflect CentrePort’s ability to handle future growth in a wide range of commodities.</p>	<p>Response: Agree.</p> <p>Recommendation: Change the ‘Port capacity’ section to read: “growing freight demand is likely to eventually require more efficient use of existing CentrePort land and possible development of offsite freight storage points or inland hubs.”</p>
		<p>The ‘Provide for expected port freight growth’ action is outside the scope of the Freight Plan and is an area that CentrePort along with log exporters and transport companies need to concentrate on. The action also portrays a negative image that CentrePort cannot handle growth.</p>	<p>Response: Disagree that it is outside the scope of the draft Freight Plan as any potential options may require improved transport connections. The draft Freight Plan acknowledges that this will be a CentrePort driven and lead action.</p> <p>Agree that the wording of the action can be changed to remove any negative connotations.</p> <p>Recommendation: Change action to read: “Investigate options for:</p> <ul style="list-style-type: none"> ● Inland port facilities ● Appropriate transport connections ● Providing more efficient use of port land <p>to provide a basis for projects to continue provision for freight growth when necessary.”</p>