



## Mt Victoria Residents Association

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### **Submission on Draft Government Policy Statement on Land Transport 2018/19-2027/28**

The Mt Victoria Residents' Association Inc (MVRA) submits the following on the draft Government Policy Statement (GPS 2018) which sets out the strategic direction for New Zealand's land transport over the next 10 years, and its funding. Mt Victoria includes local roads which have been designated State Highway 1, and so is affected directly by government policy directions on land transport.

The MVRA aims to improve the wellbeing of the residents in our neighbourhood in central Wellington through activities including promoting the quality and heritage values of the built and natural environment of Mount Victoria and enhancing it as a place to live and visit. The MVRA is currently involved in the Let's Get Wellington Moving project to improve how people move through and about central Wellington for work, business and leisure.

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We are interested in presenting our submission in person if public hearings are held.

The Association agrees with the 'one transport system' approach, but does not agree with the strategic direction in the draft Policy Statement for the reasons that follow.

#### **Strategic priorities**

1. Land transport policy has the potential to contribute significantly to improving the lives of all New Zealanders currently and into the future. Unfortunately, the GPS 2018 is merely a roll-over of GPS-2015, and neither of these is people-centred or a strategy that is sustainable.
2. The MVRA acknowledges the importance of economic growth in New Zealand where it contributes to the public interest and improving people's wellbeing. It is a grave error, however, to place economic growth and productivity at the centre of priorities for land transport, particularly as it does not even reflect the purpose in the Land Transport Management Act 2003, which is "To contribute to an effective, efficient, and safe land transport system in the public interest". This statement is buried in Appendix B of the GPS. Surely a forward-looking GPS should be people-centred, suggesting a vision of "safe, effective and accessible transport networks which enable people to move from place to place for work, business, education,

leisure and other purposes in a way that is socially, environmentally and economically sustainable". How people do that must embrace all modes of transport, including walking, cycling, public transport (including rail) and other motorised vehicles.

3. The MVRA is pleased to see road safety is a strategic priority. This too should be people-centred, and so give at least equal attention to the safety of pedestrians, cyclists and public transport users, as it does to motorised vehicle occupants.
4. Of great concern to the MVRA is what is missing from the strategic priorities, particularly because land transport is a major factor in climate change, sustainability of resources, and health. The MVRA strongly urges that the strategic priorities include:
  - *Climate change.* New Zealand is committed under the United Nations Framework Convention on Climate Change and the Paris Agreement on Climate Change to make substantial reductions in greenhouse gas emissions. The draft GPS 2018 shows no such commitment - climate change is mentioned only twice as an aside and CO<sub>2</sub> emissions only four times in the entire 50 pages of the GPS. Surely a strategic priority for land transport should be to reduce vehicle greenhouse gas emissions in order to meet international commitments and the provisions of New Zealand's Energy Efficiency & Conservation Strategy. It is insufficient to rely on technological changes, as these are happening too slowly. There should be a major strategic shift in the GPS towards active transport modes, and public transport.
  - *Sustainable transport.* Sustainability implies the Brundtland Commission concept of meeting current needs without sacrificing future generations' ability to do the same. Transport consumes depletable materials, energy, human and ecological habitats, atmospheric carbon-loading capacity, and people's time. Priority should be given to the requirements of the Resource Management Act 1991 and its purpose of promoting the sustainable management of natural and physical resources, including to meet the needs of future generations. It is unacceptable that the GPS 2018 gives less focus to the effects of land transport on the environment (see page 12).
  - *Health.* A people-centred land transport policy should also give priority to improving people's health by contributing to the requirements of the New Zealand Health Strategy. There are known health risks, especially to young people, from air pollution, and in particular diesel particulates which are strongly implicated in causing or contributing to asthma in children and neurological illnesses. In addition and as an example, physical inactivity in the Wellington region was estimated to cost \$141 million in 2010 (see *The Cost of Physical Inactivity* – co-authored by the Wellington Regional Council).
5. The recent OECD report on environmental performance (*OECD Environmental Performance Reviews: New Zealand 2017*) is evidence that major efforts are needed immediately to address serious shortcomings which impact negatively on all three aspects in the previous paragraph:
  - New Zealand's road transport emissions are the highest or among the highest per capita in the OECD for nitrogen and sulphur oxides, carbon monoxide, non-methane volatile organic compounds and CO<sub>2</sub>
  - New Zealand stands out as one of the few OECD member countries that saw emissions of major air pollutants increase since 2000, with transport and industry the main drivers, and
  - New Zealand's gross greenhouse gas emissions per capital and per unit of GDP remain

among the five highest in the OECD, and have continued to rise, due mainly to road transport, the agricultural sector, manufacturing industries, and construction.

6. The Government also has an opportunity to ensure its GPS 2018 keeps New Zealand's capital city as a people-centred, eco city for residents and tourists. This is our region's point of differentiation from other large New Zealand and Australasian cities with alienating motorways and flyovers slicing through them. The Wellington transport networks can avoid going along the same pathway as the Auckland fiasco. A 2012 Te Papa report suggests the first activity of visitors, who are important contributors to our social and economic life, is to walk the city streets. Wellington city is our nation's capital and guardian of many social and cultural heritage aspects of national significance
7. The citizens of Wellington have clearly indicated their preference for a people-centred, eco, well-connected city. The Wellington City Council is actively engaged in implementing its urban growth plan in which the transport component has a sustainable transport hierarchy of pedestrians first, followed in order by cyclists, public transport, moving freight, and private vehicles. The MVRA urges that the GPS 2018 take a similar approach, at least for urban areas.

#### **National land transport objectives**

8. The MVRA has the following comments on the objectives of the GPS 2018.

#### ***Addressing current and future demand for access to economic and social opportunities***

9. The MVRA agrees that a 'one transport system' approach is needed, and that it must include all transport modes and good coordination with those responsible for different transport modes. Ideally, this should encompass all land transport including rail, and also shipping, and air. This broader approach would enable public funding to be a more effective lever for encouraging use of the various transport modes, and for better connections between them.
10. We urge that the GPS give much higher priority to walking, public transport and cycling modes, with better sharing of the limited road space between them and motorised vehicles.
11. We also agree there should be increased focus on regional roads. However, this should not mean building new or larger roads which consume valuable productive land. Nor should the improvements be driven by the need to cater to tourists – improvements should cater for New Zealanders first.

#### ***Resilient system***

12. To be more resilient to disruptions, the 'one transport system' needs to be more broadly defined to include not only roads, but also rail, shipping and air so alternatives are available in the system when particular modes are disrupted. A 'one transport system' would also mean better coordination between modes. For example, there was serious disruption to movements between Wellington and the Kapiti coast in January 2017 when the public rail system was closed and the main road partially closed at the same time for several weeks.
13. In addition, where the disruption is climate-related, there needs to be more emphasis on reducing climate change causes, such as greenhouse gas emissions, rather than reacting to the effects. Addressing causes would eventually reduce the need to react to effects.

### ***Safe system***

14. The MVRA agrees the GPS 2018 must support implementation of the Safer Journeys Strategy 2010-2020 and related Plans. We are very concerned the Strategy states (page 38) pedestrians accounted for 10 percent of all road deaths, and cyclists 3 percent, and the number of pedestrian injuries had not changed in 15 years despite the decline in walking by children. Improving safety for pedestrians and cyclists will remove a major barrier to more use of these active transport modes. The GPS should include more emphasis on allocating dedicated road space between modes, particularly for pedestrians, for cyclists and for public transport, and allocating more time for pedestrians to cross road spaces.
15. Road safety would also be improved if there were better incentives for freight to be moved via other modes such as rail and shipping. This is particularly the case where GPS forecasts freight on the road network to increase by 50 percent by 2042. More 'high-productivity' trucks will further exacerbate the risks for other road users.

### ***Value for money***

16. There does not appear to be much evidence that the enormous spending on road capacity, including roads of national significance, has made any difference except congestion levels have not worsened. This is not surprising as world-wide it is well known that more roading means more motorised vehicles, and fixing bottlenecks usually moves the bottlenecks elsewhere in the system. In addition, we do not agree that more high-productivity trucks will add value as they will increase dependence on carbon-intensive fuels, cause more road damage, and diminish road safety for pedestrians, cyclists and drivers of smaller motor vehicles.
17. The GPS 2018 should continue to make significant increases to investments in public transport as this is resulting in increasing numbers of people using public transport. Increasing fare-box revenue should not be an aim of public transport provision. Rather, increased use should result in reduced fares as a mechanism for encouraging continuing and more use.
18. The significant contribution walking and cycling can make to value for money is not mentioned in the GPS, although they contribute to the strategic priorities we have proposed – reducing climate change effects, sustainability and health. The MVRA urges there should be significant increases in investment in walking as currently there is no national walking programme, and less than 0.5% of the 'walking and cycling' activity class is spent on walking. We also urge the creation of a separate walking activity class to redress this.
19. Cycling funding should be targeted to improved commuter cycle access where it can make the biggest improvement.
20. In view of evidence of serious and continuing road safety issues, we urge allocation of more funding to policing of urban safety, such as enforcement of red light stopping, speed monitoring, and footpath cycling. Bad behaviour otherwise becomes the norm, reducing pedestrian safety, particularly for the aging population and children.

### ***Transport choices***

21. It is unclear why the main discussion in the GPS 2018 about public transport, and cycling is

covered in the choices objective as, together with walking, they are an essential component of all the GPS objectives. All three sustainable modes have significant health and environmental benefits.

22. That cycling is risky is not just a perception (as stated in the GPS), it is a reality. We are pleased to see GPS 2018 extends dedicated cycle networks on major arterial roads where they are most needed. Cyclists should have dedicated tracks separated from pedestrians, as they do not mix safely, and separated from motorised vehicles..

### ***Mitigating effects of land transport on the environment***

23. As noted already, it is a gross error to regard effects on the environment as less important than economic growth, and to view them as competing. The majority of land transport modes has significant negative effects on the environment including on people's health, climate change consequences, biodiversity of flora and fauna, and the quality air, water, soil and landscapes. Over time these effects impact negatively on economic growth.
24. The GPS 2018 focus only on mitigating effects on the environment is very narrow-sighted. It should include strong measures to prevent the effects before they require mitigation, such as reducing particulate and greenhouse gas emissions.

### **Funding**

25. The recent OECD environmental performance report states there has been insufficient development of alternative transport modes such as rail and public transport in New Zealand. The report also states the mix of vehicle standards and taxes does not provide sufficient incentives to renew the vehicle fleet towards cleaner, more fuel-efficient vehicle technologies.
26. Clearly, the land transport funding model is flawed as there is a built-in incentive to increase road usage by motorised vehicles (the source of revenues) in order to generate more revenue so there is more to spend on meeting the demands of motorised vehicle drivers. This is an unsustainable and exclusive circle. The model has no financial incentives to encourage increases in walking, cycling and rail, or shipping facilities. This is reflected in the Table 3. funding where the total upper limits increase by 2-3% annually from 2018/19 to 2020/21.
27. Table 3 appears to be a mix of capital and operating spending. Of the total of \$4,032 million estimated spending for 2018/19, only 1.8% (\$74 million) is allocated for walking and cycling, with no increases over the next three years. In addition, only 10.4% (\$420 million) is allocated for public transport, with only \$15 million increases over each of the next three years. Also, less than 1% is for road safety promotion, and 8.2% for road policing. The majority of the funding is allocated to state highways (55% approximately) and local roads ((22% approximately).
28. The MVRA also notes in the GPS 2018 the benefit:cost ratios for state highway funding have been diminishing over recent years, whereas walking and cycling have high benefit:cost values. This information is further evidence of the need for major change towards directions of more public benefit.
29. Although it is not clear from the information in the GPS, it appears Table 3. does not include local government funding of approximately \$1 billion a year. Nor does it include additional government appropriations for projects such as the Accelerated Regional Roads Package, the

Auckland Transport Package, or Kaikoura earthquake recovery. The additional government funding should be made transparent and be included in Table 3.

## **Conclusion**

30. The draft GPS 2018 and the recent OECD report contain clear evidence of a need to change the strategic directions for land transport as a matter of urgency. Because of this, the MVRA regrets to have to conclude that the draft GPS does not as yet recognise the need to radically refocus our strategic directions for road transport. At present the draft is narrowly focussed towards private interests, rather than the longer-term public interest. It is also seemingly unaware of the serious challenges that will inevitably have to be faced and the opportunities for positive initiatives that could arise through a refocus towards safer, healthier and less environmentally damaging transport operations.
31. We recommend that the strategic direction and funding in the GPS be redirected as a matter of urgency towards longer-term public transport improvements such as light rail in Auckland and Wellington, and to electrification of New Zealand's bus and rail fleets. We also recommend seeking comment on the draft from wider governmental and academic circles, international organisations concerned with transport, energy and environmental policies.