

TO MINISTRY OF TRANSPORT

## ENGAGEMENT DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2018

30 MARCH 2017

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### 1. GENERAL

Thank you for the opportunity to comment on the engagement draft GPS 2018.

TRAFINZ (The New Zealand Traffic Institute Inc) represents a wide grouping of NZ local authorities, covering the majority of the New Zealand population. Its membership includes regional councils, the major metropolitan cities and smaller provincial authorities as well as private sector and non-local government members.

TRAFINZ's Executive is comprised of elected councillors and officers, drawn from a cross section of the membership, together with senior personnel representing its key government partners and supported by a number of senior technical staff from transport consultancies that volunteer their services pro bono.

The Institute's primary focus is on sustainable transportation planning, traffic management and road safety. It provides specialist advice to member authorities on traffic and safety issues by drawing from the depth of expertise available through its members. It also acts as a conduit for local authorities to respond to the NZ Government on new transport policies and legislation.

Our comments on the Draft are set out below.

### 2. LAND TRANSPORT CONTEXT

TRAFINZ welcomes the emphasis on an evidence based development of transport policy and commends the Ministry on the research it has been carrying out on transport demand. We welcome that the draft GPS provides an increased level of contextual information compared to earlier GPS documents. It is good to see the GPS include references to a range of relevant Government policy documents.

There is increasing uncertainty about the level of future demand and we agree with the sentiments expressed in para 21 *"How fast and how much transport will change depends on a range of other factors including ..... central and local government creating an environment that supports change."*

Consideration of future levels of funding in response to likely changes in transport technology, revenue systems and community aspirations over the next decade is not simple or easy. The Draft starts this discussion in a rather timid way and largely supports a continuation of existing initiatives. However, the opportunity is there for more active policies that will manage future demand. Local

Councils can do this through their land use planning but this needs to be in close collaboration with national initiatives on modal choice for both goods and people movement.

The Draft appears to be based on a view that future demand for movement should be met by road construction and improved efficiency of operation, rather than by a fully comprehensive strategy that also includes **managing** demand and integration with all modes; road, rail, sea and air .

Demand management includes reducing the need to travel by integrated land use planning that supports urban densification rather than urban sprawl, providing alternative transport choices such as public transport and cycling networks and encouraging travellers to time and mode shift through road pricing.

TRAFINZ believes that the policy development work being carried out should result in a NZ Transport Strategy covering all modes. We are aware that such a document is no longer required by statute but continue to support the need for it. The GPS is specified in statute and is not intended to be such a document. While TRAFINZ is supportive of the way the document has become more sophisticated over recent years, it remains essentially a statement of government funding intentions with a focus on the roading area.

We are pleased to see greater articulation of the evidence base (including awareness of growth in population, freight and tourism) for the funding decisions in the GPS and note the consideration of a variety of future scenarios in excellent work by the Ministry of Transport.

In that light TRAFINZ would like to see more thinking about the future we want to create, rather than just appearing to react to some 'inevitable future'. Most particularly TRAFINZ questions the implicit assumption that we cannot and should not influence population size and distribution. This is particularly important with Auckland growing very rapidly and becoming increasingly dominant while large parts of regional New Zealand are withering. A strategic question is whether that is in New Zealand's best interests. We strongly support investment in tourism roads through the regional improvements activity class.

### 3. STRATEGIC DIRECTION

The three strategic priorities, continued from GPS 2015 are:

- *economic growth and productivity*
- *road safety*
- *value for money*

The key priority is stated to be Economic Growth and Productivity. TRAFINZ welcomes the reference to the need for coordination between the GPS and those responsible for other modes– a one transport system approach. (Para 38). However how this coordination will be achieved is not stated. We suggest that an essential element will be agreement on expected results and reporting measures.

TRAFINZ welcomes the continuing focus on road safety (a safe system) alongside value for money and economic growth and productivity. TRAFINZ strongly agrees with the statement (para 57) “Road safety is a responsibility we all share,” and we considers that there should be a statutory requirement for relevant players (such as RCAs, MoT, Police, ACC, insurers, large fleet operators etc) to develop their own Safe System Plans. This does not mean that they have to operate a safe system, but that they would need to show a plan to make those systems progressively safer. At the moment there is no such obligation. An interesting question will be whether new Health and Safety legislation has relevance to road safety participants.

We also comment below on the Objectives in the Draft. TRAFINZ considers that these objectives add significant value and balance to the three strategic priorities.

**Objective - A land transport system that addresses current and future demand for access to economic and social opportunities**

The GPS comments several times about supporting greenfields development (for example pages 9 and 11 on Auckland). Page 14 sensibly notes that roads should be developed to support new housing development, but what the GPS does not do is consider whether urban form decisions and demand management could reduce the need for transport investment. However, we note later (page 29 – para 169) an acknowledgement of tools like Development Contributions that could influence land use decisions, even if only at the margin.

TRAFINZ considers that demand management should be supported by providing alternative transport choices such as public transport and cycling networks and by encouraging travellers to time and mode shift through road pricing. Road pricing systems exist now and will become more sophisticated in future years. As road building becomes more difficult and expensive in major urban areas TRAFINZ sees a need to anticipate the adoption of such methods now as they will enable system owners to get better value from their existing assets into the future and could avoid the need for future expensive and disruptive new construction.

TRAFINZ particularly welcomes the GPS acknowledging (para 38) the need to consider integration between all modes and also between road land transport and rail, sea and air.

Allocation of road space is often critical if transport outcomes are to be achieved. TRAFINZ considers that the GPS could address the use of road space. Generally the biggest barrier to achieving transport outcomes is existing kerbside parking which occupies space that could be allocated to movement. For example in urban areas bus priority and cycleways are often impossible to achieve without removal of parking.

**Objective- A Land transport system that is Resilient**

TRAFINZ strongly supports the focus on ensuring resilience of the transport system. We are all very aware of the economic and social impacts of earthquake events, and of major flooding events.

**Objective- A Land transport system that is a Safe System increasingly free of death and serious injury**

While we remain supportive of the implementation of the Safer Journeys Action Plan 2016-20 we are very concerned at the increasing crash rate since 2013. It seems that additional initiatives are needed urgently. These could include:

**Safer Vehicles - Policies** to incentivise a safer vehicle fleet, such as differential registration fees that favour the faster introduction of safer vehicles into the NZ fleet and the scrapping of older vehicles. Import standards are another important tool. We should be seeking to encourage a rapid improvement in the age and quality of the New Zealand vehicle fleet. Currently the average light vehicle age is approximately 13 years meaning that our fleet lacks many modern safety features thus hugely increasing the level of road trauma and death.

**Safer Speeds –** Quick introduction of lower speed limits on highways and local roads that lack the safety barriers and surface and alignment standards needed to match the present default 100kph speed limit. We hope that legislative changes should shortly be in place to support such initiatives.

**Safer Policing -** We strongly agree with the intention (para 104) to increase the transparency and reporting of Police road safety work. A very significant budget is allocated on behalf of road users to Police to improve the safety of those road users. The required outputs and outcomes from that budget allocation should be made public, be clear and transparent, and be reported on regularly. TRAFINZ also recommends that there be more focus on outcomes and outputs rather than inputs. We support the proposed increases in Road Policing funding noting the need for transparency and better reporting.

**Safer Roads and Roadsides –** In the listing of activity areas in Table 3 there is a road safety promotion/education class and one for safety enforcement (police). TRAFINZ continues to argue that there should be a specific class for safety engineering instead of safety engineering being an invisible subset of the local roading and state highway activity classes. At very least the GPS should include the intention to report on the level of investment in safety engineering projects – as opposed to projects (eg RONS) where safety is a small component in capacity projects.

**Safety targets -** TRAFINZ has regularly advocated setting targets for reduction in road trauma. We consider that the GPS should include targets for reductions in the road toll. Clearly, at least since 2013, we are currently failing to achieve the objective of being ‘increasingly free of death and injury’ on our roads.

**Safety research –** TRAFINZ strongly supports the initiative to undertake more safety research. We have consistently advocated for more safety research work, accessing international best practice, and establishing a non- partisan safety champion organization - perhaps along the lines of the Parliamentary Commissioner for the Environment

We also suggest that the existing BCR methodology be reviewed for projects addressing high risk urban intersections. Such projects are predominantly in the Local Roads Improvements activity class. For many locations the best treatment is one that gives better protection for users and clarifies the priorities for the various traffic flows (eg traffic signals) but this may result in a very small additional traffic delay that aggregated can over-ride the safety benefits under the present methodology. If we

are to be serious about achieving the reductions in deaths and serious injuries desired then this result seems to be an “own goal”.

### **Objective- A land transport system that provides appropriate transport choices**

TRAFINZ agrees that *“Walking and cycling support a more efficient and cost efficient transport system, provide transport choice (especially for shorter trips), and provide substantial health benefits.”* Para 122. The discussion that follows includes comment that these modes and public transport are for “those without private vehicles” (para 123). While much of the other comment is not as limiting we are concerned that the advantages of mode shifting for those car users stuck in congestion are not included. Many people who have access to private cars want to use public transport or active modes by choice. This needs to be recognized – and provided for.

TRAFINZ strongly supports the clear support for public transport and active modes in the Draft. We are very pleased to see the explicit recognition of the importance of off-peak public transport services. (para 125) There have been comments and suggestions that NZTA does not see off peak services reducing congestion, and therefore not contributing to the strategic economic development objective. TRAFINZ does not agree with this, and considers there is significant benefit in providing a comprehensive service across the whole day.

We also support the linking to health and to cycle trails.

The results and reporting areas (Table 1) should include results for mode shifting.

Table1 does not include any mention of walking. A growing elderly population and continuing high levels of crashes involving pedestrians will increase the demand for extended and good quality footpaths.

### **Objective- A land transport system that increasingly mitigates the effects of land transport on the environment**

The discussion in the Draft concentrates on mitigation of impacts and while this is important there is little discussion on the potential to **avoid** impacts. Incentives to encourage use of electric vehicles will assist, but so too would incentives to encourage faster road fleet renewal with modern engines being generally cleaner burning and more fuel efficient.

Reduced CO2 emissions are a strong rationale for the encouragement of mode shifting to walking and cycling, where health benefits are also available. It is also relevant to the switch to mass transport options such as bus and train, where alternative fuels such as electric power are common, and to the encouragement of rail and coastal shipping for goods movement.

TRAFINZ particularly considers that the Environment objective section needs specifically to refer to the need to reduce emissions, and critically should set target emission levels. New Zealand has committed to the Paris agreements. Transport is one of the most significant contributors to New Zealand greenhouse gas emissions, and is probably the single area where we have the most potential for emissions reduction.

TRAFINZ agrees that a ‘whole of system’ approach is needed and the results and reporting measures in Table 1 should include results and reporting relevant to such an approach.

#### **4. INVESTMENT IN LAND TRANSPORT**

TRAFINZ continues to consider that the activity class arrangement is somewhat arbitrary, with no robust justification for the funding levels proposed. We have the following comments on the proposals in GPS2018.

We welcome the increased potential for funding rural and provincial projects.

Local road maintenance needs are likely to increase as a result of Government decisions made recently on the Vehicle Dimensions and Mass Rule 2016. The expected greater impacts on pavements were discussed in various forums during the consultations and the comment from NZTA representatives was that any additional costs would be funded from extra RUC. However for local roads the extra pavement costs will require an increased matching contribution from Council rates- the Council share. A preferable and fairer means of funding such increased costs would be to increase the FAR for such work across all Councils so that the need for extra rates contribution is avoided.

We also note that in Table 3 there is comment that the Local road improvements activity class has been consistently underspent in recent years. This is occurring despite such projects having a significantly higher BC than State Highway projects. For the Regional improvements activity class it is apparent that there has been a similar problem with Councils unable to fund their share. It is stated that consideration is being given to lowering the local share. The same approach should apply to the Local Roads Improvement class. There are concerns across whole networks of regional roads, not just key freight and tourist routes.

The local road network needs additional investment not less. Much of the increase in road trauma over recent years has been on this network. Local authorities will need funding from the Local road improvements activity class for the delivery of the new speed limit regime which is set out in the Speed Management Guide. This is an important component of creating safer roads. Recognising that there hasn't been an ability to find local share in the past, there will be a need for a specific FAR to support this work in the future

To go back to our earlier comments on population distribution, we all know that there are large areas of provincial and rural New Zealand which are experiencing ongoing population ageing and decline. They will have increasing difficulty in maintaining their transport networks. TRAFINZ considers that for these authorities some greater level of national support will likely be necessary, of not now, then certainly in the future. TRAFINZ understands that Local Government NZ is also commenting on these matters and agrees with their views.

We also welcome the increase in funding for active modes. Consideration should be given to supporting improvement and maintenance of pedestrian infrastructure (including footpaths) as this is every bit part of the transport network. Not only do footpaths (and other pedestrian amenities) provide for mobility and safety, they also allow for vehicle access across them between roads and properties.

We note the comments (page 27) on PT farebox recovery rates being at expected levels, and note the need for reasonable equity in these expectations across the country.

## **5 MINISTERIAL EXPECTATIONS**

This is the only place in the GPS where there is a meaningful reference to the role land use can play in affecting the level of transport demand (para 169). TRAFINZ considers that this is a critical point that is hugely underplayed, and indeed undermined by a focus elsewhere in the document in deliberately focusing on supporting greenfields development, rather than intensification of development.

Demand management includes reducing the need to travel by integrated land use planning that supports urban densification rather than urban sprawl. Good urban form is absolutely critical in reducing transport demand. The GPS seems somewhat confused on this matter. We consider that the GPS should pay more attention to the critical role of urban form and landuse in affecting transport demand.

Therefore, as part of a response to that, we welcome this logical intention to charge developments for the relevant proportion of the costs of public infrastructure to service those developments. This is the principle behind development contributions (DCs) which support the growth related components of local roads and infrastructure. TRAFINZ has argued that DCs should also be applied to NZTA roads and to regional council transport costs (public transport), so we are very pleased to see this concept adopted here.

## 6 SUMMARY

TRAFINZ welcomes the evidence –based approach being taken by the Ministry in the development of transport policy. While we recognise that the future environment is unclear we would encourage greater emphasis on the managing of land transport demand. We support a one- system approach and see a need for a NZ Transport Strategy covering all modes, alongside the GPS.

In the Draft GPS 2018 we welcome the continued focus on Road Safety as one of the Strategic Priorities but are most concerned at the present lack of progress in reducing road trauma. We believe that new initiatives are needed and make suggestions for action on the vehicle fleet, speed limits and the funding of safety improvements.

We support the references made about cycling and walking as part of an integrated land transport system. However we are disappointed at the lack of results and performance areas for these modes in the draft.

We support the comments about mitigating the effects of land transport on the environment but would argue that more emphasis is needed on avoiding impacts through mode shifting, with the development of appropriate results and performance measures.

We are concerned that the funding ranges for Local Road Improvements and Maintenance activity classes are shown as decreasing and argue that the local road network needs more investment in future, not less.

TRAFINZ appreciates the opportunity to make these comments and will be pleased to provide further clarification if required.

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