



Submission in response to draft Government Policy Statement on land transport 2024 (GPS 2024)

15 September 2023

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We consent to our comments being published.

Introduction

Living Streets Aotearoa is the New Zealand organisation for people on foot, promoting walking-friendly communities. We are a nationwide organisation with local branches and affiliates throughout New Zealand.

We want more people walking and enjoying public spaces be they young or old, fast or slow, whether walking, sitting, commuting, shopping, between appointments, or out on the streets for exercise, for leisure or for pleasure.

General comments

We welcome the opportunity to comment on the draft Government Policy Statement (GPS) on Land Transport 2024. However, we are very disappointed to see that emissions reductions has been deprioritised in this draft, relative to the originally announced intention in the Indicative Strategic Priorities Engagement Paper released by Te Manatū Waka in early 2023 to elevate emissions reduction to become the overarching focus for GPS 2024.

This is even more unfortunate given that the draft GPS 2024 appears to rely on much of the funding for the transition to a low-carbon transport system coming from the Climate Emergency Response Fund (CERF), whereas the two main political parties have both announced that they plan to siphon off some or all of the CERF funding for other purposes. We submit that emissions reduction should be restored to top priority for GPS 2024, and that funding for low-carbon transport should be made a central priority of the NLTF, especially since CERF funding cannot be relied on.

We note that the 2021 GPS included an objective to “Transform to a low-carbon transport system...” whereas the 2024 GPS weakens this to “Transitioning to a lower-carbon transport system”. This is a fundamental flaw of the 2024 GPS. We submit that the 2021 objective should be retained.

We submit that, wherever the term "active modes" is used in the document, it should be replaced by "walking and cycling". If the term "active modes" continues to be used, it should be specifically defined to exclude e-scooters and other forms of transport that require minimal or no expenditure of human muscular energy.

We are disappointed that Waka Kotahi has chosen to continue to combine walking and cycling in the "Walking and Cycling Improvements" activity class. We have consistently argued, and will continue to argue, that though walking and cycling are both low-carbon transport modes, they are different in character as cycling is a vehicular mode and walking is not - with the exception of the use of low-speed mobility devices, used by people with disabilities, on footpaths, which we support. In our view, there should be separate "Walking Improvements" and "Cycling Improvements" classes, and each should receive an absolute minimum of 10% of transport funding.

Living Streets Aotearoa supports Vision Zero and the need to have a safe transport system to support and enable genuine travel choice and inclusivity for everyone to meet their needs and thrive. We oppose the Road to Zero activity class being disestablished and incorporated into the State Highway and Local Road improvement programmes. We are further concerned that the removal of "% of state highway and local road networks modified to align with a safe and appropriate speed" and "% of urban network with speed limit of 40 km/h or below" as GPS performance indicators (GPS 2021, Table 1, page 24), and the Government's recent significant reduction in commitment to speed management delivery on state highways also highlights the reduced commitment to the Road to Zero activity class outcomes.

The Government must support the vital need to address road safety and reduce pedestrian deaths. These proposed changes have the opposite effect.

Specific comments

p. 24 Replace "makes an appropriate contribution to the 2035 transport emissions reduction targets, within the available NLTF funding, the NLTP's scope of influence, the expectations set out in Section 4 of this GPS, and other interventions to reduce emissions including land transport investment outside of the NLTF" with "makes the contribution necessary to reach the 2035 transport emissions reduction targets."

p. 24 Change "using public transport or active modes" to "using public transport, walking and cycling" to reflect the need for a fully integrated active and public transport system.

p. 24 Replace "For the avoidance of doubt, the GPS does not expect that every individual investment within the NLTP must reduce emissions" with "For the avoidance of doubt, the GPS does not expect that every individual investment within the NLTP must reduce emissions, but no investment within the NLTP may increase emissions."

p. 24 Prioritising public transport must also include prioritising the quality of the "first and last kilometre" walking journeys to and from public transport.

p. 35 Evaluation of progress should specifically include evaluation of the physical and mental health and wellbeing co-benefits of walking projects, plans, actions and priorities, and the disbenefits of car-oriented projects, plans, actions and priorities.

p. 46 As noted earlier, "Walking Improvements" and "Cycling Improvements" should be separate classes, and each should receive an absolute minimum of 10% of transport funding.

p. 46 We support the creation of the new "Inter-regional public transport" class.

p. 58 We support the emphasis on "build back better" - for example, in creating wider footpaths rather than doing like-for-like replacements.

p. 62 There should be a separate walking improvements class that specifically excludes micro-mobility.