

Living Streets Aotearoa



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

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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.

Introduction

Living Streets Aotearoa welcomes the opportunity to comment on the draft Government Policy Statement (GPS) on Land Transport 2024. However, we are disappointed that the draft GPS reduces funding for walking, limits funding for walking infrastructure to the Walking and Cycling activity class, does not prioritise the safety of all road users, including pedestrians, and does not include a strong focus on emissions reductions.

We have made a number of key recommendations for amendments to the draft GPS in relation to walking, and these are below. This is followed by a comprehensive analysis of the draft GPS, with additional recommendations.

Under the heading “Walking and cycling” (p. 15) the draft GPS states:

Investment in walking and cycling should only take place where there is either clear benefit for increasing economic growth or clear benefit for improving safety and demonstrated volumes of pedestrians and cyclists already exist. All investment in walking and cycling will come from the Walking and Cycling activity class, including investment in maintaining the existing walking and cycling network.

We disagree with this statement in three main areas:

1. Walking and cycling are different modes and they should be considered separately. We recommend that, rather than having a combined “walking and cycling

- improvements” activity class, there should be separate “Walking improvements” and “Cycling improvements” activity classes, and each should be well funded – at above the previous level. We are opposed to the sharp funding cut proposed in the draft GPS.
2. The approach of only investing in walking and cycling when demonstrated volumes of pedestrians and cycling already exists is misguided and ignores two important factors: Firstly, that many potential users of these modes will only use them when safe, separated infrastructure is provided, and secondly, that encouraging more people to walk, or take combined walking and public transport trips, for short journeys will benefit drivers too, as fewer cars will be on the roads.
 3. It is both inequitable and economically inefficient to restrict funding for walking and cycling to the walking and cycling activity class, especially as the level of funding for this class has been sharply cut. As a pedestrian advocacy organisation, we submit that the previous practice of funding footpaths besides new roads, and footpath maintenance, from the applicable roading activity class should be continued.

Our recommendations and analysis below cover these and many other aspects of the draft GPS.

We note that the submissions on the draft GPS by the New Zealand College of Public Health Medicine and by TRAFINZ provide particularly cogent arguments and analysis for why improving public and personal health, reducing transport emissions, and improving the safety of all road users should be central goals of New Zealand transport policy, and commend these submissions to your attention.

Key Recommendations

We recommend that the GPS 2024 is revised to:

1. Create separate “Walking improvements” and “Cycling improvements” funding class, rather than combining the two modes in the present “Walking and Cycling Improvements” class. Walking and cycling are different modes with different needs. Each is important and each should be funded separately.
2. Increase funding for walking, rather than reducing it. Walking should receive at least 10% of the overall transport budget.
3. More generally, increase funding for walking, cycling and public transport to enable projects that support New Zealanders’ stated transport preferences as well as health and wellbeing for the short and long term.
4. Ensure that footpaths alongside new roads can be provided and paid for out of the roading budget, and that footpath maintenance can be paid for out of the road maintenance budget, rather than restricting the provision of such funding to the Walking and Cycling Improvements class.

5. Retain a strong focus on the health and safety of all road users, including by retaining and strengthening, rather than reversing, measures to reduce vehicle speeds. International evidence has proven over the past 50 years that one of the key measures to improve traffic safety and pedestrian safety in urban areas is, and remains, lowering speed limits. The GPS should prioritise the safety of all road users, not just drivers.
6. Recognise that footpaths are for people on foot and for those using low-speed mobility devices, such as wheelchairs – and that users of bikes, e-bikes and other micromobility devices deserve safe, separated infrastructure, and other road safety measures, that do not place them on the footpath.
7. Introduce measures to reduce and deter the use of very large private passenger vehicles in urban settings, which are making roads less safe. These vehicles have been found in the US to be more likely to be driven into pedestrians, and more likely to kill them.
8. Acknowledge that raised safety platforms in the right place have a track record of being highly successful road safety interventions, and that urban RCAs should not be precluded from installing raised safety platforms.
9. Include reducing greenhouse gas emissions as a key objective of the transport system, and prioritise policies that will achieve our legally committed emissions reductions targets while improving the health of New Zealanders.
10. Take into account the extensive body of international and local research evidence about how to create an efficient, inclusive, healthy and sustainable transport system that will help New Zealand prosper.
11. Recognise the real economic and social costs and benefits of transport policies by requiring that any assessment of "value for money" of transport projects include assessment of the full costs and benefits, including the expected health and environmental impacts both in the short and longer term.
12. Reinstate the transport system priority of inclusive access to ensure that all New Zealanders can benefit fairly from the transport system they fund.
13. Include a wider range of health impacts and include policies that reduce the impact of transport on these outcomes (e.g. physical activity, air pollution, noise pollution, and inclusive access).
14. More generally, it would be preferable for the GPS to have activity classes based on outputs (and hence outcomes) rather than predetermined, restrictive ones based on inputs, with the process for producing the funding ranges clearly defined.

Full analysis of the GPS and additional recommendations

What should a GPS achieve?

The purpose of a GPS should be to set a long-term direction for the work, and then set some short-term steps that help move towards that long-term vision.

While the short-term priorities of governments will vary, the long term vision should be relatively stable. Transport investments need to last for a long time – transport corridors should be relatively permanent, a railway line should be able to continue to deliver for centuries, the effects of transport on urban form will be very hard to reverse, and transport habits are slow to change. To be stable, the long term vision must be based on broadly accepted principles (e.g. economic efficiency, equity, resilience) and robust evidence for what will contribute or take us away from those ideals.

Internationally, there is little dispute about high level principles and effects of investment options. There is general agreement on a number of key matters, including:

- The relative safety risks of various modes (e.g. that motorcycles are high risk and mass transit use is low risk).
- The modal hierarchy – which modes provide highest benefits to the transport system for lowest investments (walking being at the top).
- That you cannot build your way out of traffic congestion, since building additional road capacity will induce more traffic.
- That having a compact urban form has economic benefits, by encouraging unplanned connections and collaborations, and that the most economically successful cities are highly compact with most commuting done by underground mass transit.
- That improved walkability (a combination of good pedestrian service levels and an urban form that reduces the distance people need to travel (e.g. to get to shops, schools, jobs) delivers economic benefits (houses in more walkable neighbourhoods have higher market value, and retail precincts with high foot traffic will be more successful), and has major public health benefits (by increasing exercise and social connections).
- Where congestion is an issue, building more roads isn't a viable solution, so travel demand management will be necessary (e.g. congestion charging at peak), and road space allocation should favour high value modes such as freight and mass transit (e.g. through providing bus lanes).
- Minimum parking requirements for developments have a negative effect on cities, including by pushing retail out of town centres and increasing the cost of business developments.

This GPS does not set out a clear long term vision for New Zealand. Some of the short term measures included will push the transport system away from the generally accepted approach, but no reason for doing that is included, so it is not clear whether this government has some other vision or disagrees with the consensus on how transport networks can be made economically efficient and deliver public benefits.

What should be the long-term goals of the GPS

In terms of very high level goals, the GPS has a statement that is generally consistent with what is in the legislation and has been the accepted approach in New Zealand:

The Government's overarching goal for transport is an effective, efficient, safe, secure, accessible, and resilient transport system that supports the growth of our country's economy in order to deliver greater prosperity, security and opportunities for all New Zealanders.

Two elements are missing – consideration of carbon emissions and public health. The document does recognise that transport makes a significant contribution to carbon emissions in New Zealand, but it only mentions the health effect of crashes, not of the overall transport system. It is now well accepted that transport systems have major implications for public health, including through their effects on access to health care, air quality, noise, exercise, social connections, and equity of access.

The document lacks, however, a vision of the type of transport system that is needed to deliver those broad outcomes, the document generates uncertainty in relation to carbon emission objectives, and a number of the detailed priorities will be counterproductive in relation to the high level goals.

It would be reasonable to expect a GPS to provide a more specific vision, preferably agreed by all parties in Parliament, including matters such as:

- The objectives in relation to carbon emissions (directly or by reference to other documents);
- The objectives in relation to road safety;
- Objectives in relation to modal share, given the importance of that to overall economic efficiency of the network and congestion reduction (e.g. proportion of short personal trips that should be done by walking and by cycling, goals for moving freight from road to rail).

The absence of these sorts of goals means that short term objectives (e.g. to increase fare box recovery) could be met in ways that take us in the wrong direction over the long term.

It would also be reasonable to expect that a GPS would provide an overall sense of what an optimal transport network might look like and standards that should be applied. For example:

- the transport network should minimise the coastal footprint of urban ports by maximising the use of inland ports (where land is less valuable) and rail links between those and coastal ports (which greatly reduces effects on freight of urban traffic and effects of trucks on urban communities).
- Cities should (as far as possible) have a complete pedestrian grid with moderate block size (e.g. 200-300 metres).
- NZTA has guidelines for pedestrian facilities and cycling facilities which should be applied when those are being designed.

Recommendation

That the GPS include a strategic section at the front, which sets out in more detail what the transport system should be like. A possible section is set out in the appendix.

Accessibility vs mobility

Accessibility is the key role of the transport network – to allow people to access opportunities and goods.

Mobility is not, in itself, a benefit. It is only a benefit if it provides access (or is done by walking and cycling and delivers health and wellbeing benefits). In fact, a key goal of transport and land use planning should be to reduce unnecessary journeys and vehicle kilometres travelled – to allow people to access what they need without long journeys, and to shorten supply chains. That will increase economic efficiency, by reducing waste of materials (e.g. fuel), allowing time to be used for productive purposes, reducing crashes and allowing the freight system to be more efficient.

Reduced mobility can be achieved through:

- Effective use of digital technology to make journeys unnecessary.
- Efficient urban form, so regular journeys are shorter.
- Producing more goods close to consumers, and reducing the volume of goods (e.g. by shipping products unassembled).
- Reducing waste so fewer goods need to be shipped (e.g. reducing food waste, eliminating single use items)

A problem with the GPS is that it focuses on reducing travel times but not travel distance. That flows through into a focus on making trips faster. There is good evidence to show that if trips are faster, that tends to result in longer trips rather than improved economic efficiency, e.g. because people buy a house further from their job. So we will have spent a lot of money but the average person is not better off and we have become a less efficient and robust country.

Recommendation:

The GPS should clearly identify two key priorities for achieving improved economic efficiency and wellbeing:

- Reducing vehicle kilometres travelled, including by reducing journeys, journey lengths, and encouraging modal shift to walking and cycling; and
- Making transit times more predictable for all modes.

Equity of access

Equity of access is also important. A key reason for providing choice (e.g. providing footpaths and public transport) should be to improve equity of access.

Around 30% of New Zealanders do not have a drivers licence, and many with a licence do not have easy access to a car at all times. Access to licences and cars is not evenly spread across society. The young and old are less likely to have a licence, but so are women in some ethnic groups and people with disabilities. Low income households are less likely to be able to afford a car and likely to have a less reliable car, but are also more likely to need

one (e.g. because of shift work, inability to afford housing near their work, having multiple workers in the household).

In addition, there are many people who should not be driving some or all of the time – those who are taking drugs or medication, those who are disqualified from driving, those suffering fatigue, those with medical conditions that make them at risk of a crash, and so on. But if they feel they do not have a suitable alternative, they will take the risk. A lack of alternatives can result in judges and doctors being more reluctant to remove the right to a driver's licence (e.g. when elderly people have eyesight problems).

Poor options can also push low income people (including young men) into using higher risk modes – motorcycles which are cheap to buy and operate, poor quality vehicles which are cheap to buy.

The GPS is almost completely silent on this issue, and chooses an enforcement approach to unsafe driving rather than also tackling lack of alternatives. It makes no mention of total mobility, provision of disabled parking spaces, considering accessibility in public transport and walking and cycling provision, and other measures that are needed to improve equity and reduce the financial burden of transport for low income households. Instead, it effectively rules out provision of alternatives for many people, by prohibiting the inclusion of walking and cycling provision in state highway work, imposing a blanket requirement for higher farebox recovery, and restricting work on walking and cycling provision to places that already have high rates for those modes.

One effect of these approaches will be to perpetuate the unsafe walking conditions in rural areas. These areas often have houses and services (shops, hotel, beach, river) spread over a significant distance, separated by roads (often state highways) that have no shoulder to make walking and cycling safe. That means that residents in those areas (and visitors to tourism destinations) must either use a car for short trips, take the risk of being hit by a car while walking or cycling, or not make the journey. A significant number of pedestrian fatalities in these areas are hit while walking at night.

Recommendation:

The GPS should require NZTA and RCAs to incorporate into their strategies and plans a goal to improve equity of access, and seek to identify low cost ways to address accessibility issues.

For example, a rural walking route does not need to be a paved footpath. An off-road flat strip can often be easily provided at the same time that drainage is put in, and communities can contribute to keeping it clear and usable as a path.

In relation to public transport, the GPS should recognise that low patronage bus services may be particularly important to provide accessibility and reduce high risk driving, and encourage councils to identify measures that will build fare box revenue for the overall public transport network without cutting those services.

Carbon emissions

The GPS states that:

The Government recognises that one of the action items in the current Emissions Reduction Plan (ERP1), prepared under the previous Government, refers to ensuring the next Government Policy Statement on Land Transport guides investment that is consistent with the emissions reduction plan. Following the general election and a change of government in late 2023, the intended emissions reduction policies foreshadowed by the previous Government are being reassessed. For this reason, GPS 2024 has not undertaken the alignment exercise as anticipated in ERP1.

Leaving aside the question of whether ERPs should be treated as just a previous government's response to the issue, the GPS then simply fails to provide an alternative assessment, and its measures will not effectively reduce transport emissions.

The GPS projects are likely to increase vehicle use and encourage modal shifts to higher carbon modes. The GPS appears to rely on two measures to combat that effect:

- Electrifying the vehicle fleet; and
- Using the ETS to achieve changes in behaviour.

The ETS is not an appropriate tool to shift commuter behaviour, as it would need to be set at a level where it would greatly increase the cost of car use, which governments are unlikely to do. And if they did, that would have massive economic effects, particularly on low income households with few alternatives (e.g. who cannot buy an EV, don't have access to a bus service).

Electrifying the vehicle fleet is desirable, but there are issues with this approach. It will take a long period for the fleet to shift, and for New Zealand to generate enough low impact renewable energy to service our current transport needs. The government has removed a measure that was intended to incentivise the switch to EVs and make it more affordable, but the GPS does not identify alternatives. Increasing vehicle kilometres travelled (a highly likely effect of other policies) will eat into the benefits, and also increase the amount of renewable energy needed. Finally, the GPS has no policies related to electrifying the rail system, local ferries and bus services – areas where the technology is available and can be readily implemented, and which would cut diesel emissions in urban areas (a significant health concern).

Recommendation:

An assessment of the emissions effects of the projects in the GPS should be undertaken.

In addition to steps to electrify the fleet, the GPS should include a clear policy to “develop low emission transport networks, including by encouraging land use planning and other measures that will reduce journey lengths, facilitating electrification of road and rail vehicles, and facilitating modal shift to lower emission modes (including mass transit and walking and cycling).

Roads of National Significance

The GPS suggests that RONS was "successful", and that therefore a further set of RONS projects will reduce congestion, and drive economic growth.

There is no evidence provided to back up this statement, and there seems to have been no analysis of the overall effect of the RONS projects.

The information available suggests that RONS was not successful:

- The projects were expensive and low BCR (e.g. the MacKays to Peka Peka Expressway had a final BCR of 0.6, which means it cost more than it delivered in benefits).
- Some projects were likely to induce traffic and shift congestion, making the overall congestion situation worse in the long term. For example, NZTA's experts in the Transmission Gully Motorway hearings provided evidence that it would result in a massive (25%) movement of trips from rail to road. All those trips would then enter roads that are already congested – Ngauranga Gorge, Kenepuru Drive, etc.
- The projects were individual sections of road which often weren't planned as part of wider network adjustments, for example using travel demand management measures and/or improved public transport options to reduce induced traffic and keep the roads available for freight and business traffic. In some cases (e.g. MacKays to Peka Peka) they were an alternative to a planned road rather than being something that had been thought through at the regional level previously.
- There were construction, build quality and cost-overrun problems.
- The funds mostly came by cutting other transport work, notably rural and provincial road improvements.

The GPS provides no useful information on why the projects on the list were chosen. It feels like a miscellaneous grab bag of projects, rather than a list that has been the outcome of a rational prioritisation against the government's objectives.

There is also no indication of how they weighted the disparate benefits mentioned (releasing land for housing, economic growth, congestion), nor how much benefit was needed before something went on the list.

For example, Petone-Grenada is included as an "unlock housing" project. It is an extremely expensive road that will be very difficult to build (requiring more earthworks than Transmission Gully did, and with limited ability to balance cut and fill). It will also cut through a regional park. There is no justification provided for why this is the best investment to increase housing in Wellington. Why not invest in water and rail electrification for more housing around Otaki to Waikanae? Or invest in projects that will increase housing in Upper Hutt (Maymorn).

What happened with the previous RONS process was that good projects with a higher BCR than the RONS projects couldn't be treated in regional land transport plans as a high priority, because they failed on "strategic fit". There has to be a very good reason to favour a less beneficial project, and there is nothing in this GPS to say how you would make those choices. Nor is there anything in the GPS to indicate how you would decide to dump a project if the business case didn't make sense once more work had been done, because there is no clear standard a project has to meet. At the very least, you would expect a

minimum BCR (e.g. 3.5), and a requirement that other work has shown that benefits will be realised (e.g. that the land around the road is able to be intensively developed for housing).

Recommendation:

The RONS projects should be made purely indicative, and instead the document should clearly set out the criteria for choosing projects that warrant a high priority.

Those criteria should include:

- All projects must:
 - have a high BCR (at least 3); and
 - have neutral or positive public health impacts; and
 - contribute to New Zealand’s carbon emissions reduction targets.
- The highest priority would be for projects that will:
 - Address major resilience risks that could result in loss of access for communities or industries; and/or
 - Address significant road safety risks; and/or
 - Provide essential transport links for major new industrial or primary production opportunities, including shipping options that would reduce stress on the land transport network such as log barging ports.
 - Enable more effective use of existing networks and infrastructure, and thereby avoid the need to construct new infrastructure.
- Projects would be considered where they will facilitate the opening up of land for housing, where:
 - There will be a significant correction of housing market failure, including provision of social housing and affordable housing; and
 - The housing and transport proposals are consistent with agreed spatial plans (e.g. urban growth plans) for the area; and
 - The project will help encourage low carbon transport options; and
 - The project will ensure equitable access for all potential residents.

Resilience

The document states that one of the outcomes expected is a “more resilient network”. There are no details in the document as to what level of resilience is desired, or how appropriate service levels will be determined.

This is a critical issue. Achieving high resilience can be very expensive, so it is important to determine what level is needed. But equally, it is vital to avoid investing in projects with poor long-term resilience, or that will make hazard risks worse.

This is an area where the GPS should be providing some clear guidance, but does not. It also takes an approach to funding decisions that is contrary to the need for improved resilience, particularly in relation to funding of rail, public transport and walking and cycling infrastructure.

Resilience can be improved through:

- Locating infrastructure so it is less vulnerable.
- Designing infrastructure so it is less likely to fail and can be more rapidly fixed.

- Adding redundancy to the network or services, so that if one option becomes unavailable other options can be used.

All these options can be very high cost, so it is important that the benefits justify the investment.

Where there is existing redundancy that should be retained for as long as possible. For example, the Masterton to Woodville railway line provides important resilience for the Wellington-Napier line. If the Manawatu gorge is closed, trains can still get through. And the conditions that are likely to close one line are less likely to affect the other. Similarly, when the road to Napier is closed by flooding, the railway line can generally still operate, which is one reason that some major industries have argued for keeping the line open.

But the creation of additional redundancy in the system should be assessed with care, to ensure that the best option for resilience is being taken. For example, improving rail instead of a second road, or adding a ferry option, may be more cost effective.

Another option that we need to increasingly consider is to have a lower level of service. For example, the Eastbourne road is increasingly affected by tides and storm surge. Keeping an all weather road may not be the best long term solution, and investing in ferries and wharves instead may be more cost effective.

Where there is likely to be loss of access after major adverse events, it is vital that there are good walking routes so people can, if necessary, get in or out. In the case of Eastbourne, for example, there are regional park walking tracks that could be used to get to Wainuiomata in an emergency.

Recommendation:

The GPS should encourage or require councils and NZTA to do resilience and climate adaptation plans for their transport networks.

The GPS should include a policy that “the most cost-effective resilience options should be adopted, including consideration of using multiple modes to ensure there will be access during and after incidents that close the main transport route.”

Travel time

The document identifies reduced journey times and increased travel time reliability as an outcome, and treats these two matters as if they are closely related and equally important.

There has been a lot of investment in the past to reduce journey times, often at very high cost.

What the research shows is that it is travel time reliability that is important. People will choose their job, house, mode of transport, holiday destination, etc, based on whether they consider the travel time associated with that is acceptable. Minor time savings once they have made that choice are of generally of low value to them.

But they need to know what the travel time is, and high variability will make it difficult for people and businesses to make decisions and use their time effectively.

For example, if a tradesperson knows what the travel time between two jobs will be, they can reliably schedule jobs and effectively use the full day. But if it might vary significantly, they will need to either factor in the longest possible time or risk arriving late and having to cancel the last job of the day. The same applies for public transport trips, where bus companies either need to have longer breaks at the end of bus runs, or periodically cancel a trip to make up for the effect of delays. Similarly, the user of the bus may need to take an earlier bus if they need to be sure of arriving at their destination on time, which may add 30 minutes or more to their journey.

For economic efficiency, therefore, investment should be focused on travel time reliability, and the GPS should be prioritising that rather than conflating it with average journey times.

The other problem that arises in transport work is the tendency to focus on the journey time for part of a trip. For example, in the case cited above, a 30 second savings in a car commuting journey would easily be lost at the other end if the commuter has to wait an extra 30 seconds to cross a road as they walk from their carpark to their office. Yet the draft GPS is actively discouraging investment in pedestrian facilities that may be a far cheaper way to reduce overall journey time and improve journey reliability.

Inland ports are another way to improve journey time reliability. For example, a truck can drop containers at Wiri without needing to move through peak traffic within central Auckland, which has made their journey times shorter and more predictable, allowing more efficient use of truck fleets.

Recommendation:

The GPS should include a clear policy that “A priority outcome for investments in transport networks should be to improve journey time reliability, particularly for routes and services that have high numbers of users, and for key freight routes.”

It should also include a clear policy encouraging the use of inland ports, log transfer stations and rail to improve efficiency of freight movement and reduce truck movements in cities and on roads where they can affect journey times of other traffic (e.g. Remutaka Hill Road).

Funding sources and cross-subsidisation

In relation to public transport, a particular focus for this GPS is on low farebox recovery rates. In relation to road funding, there is a focus on fuel taxes vs road user charges. There is also some mention of the issue of cross-subsidisation.

Transport systems are networks. It makes no sense to seek to fund them as if they were a series of unrelated bits of infrastructure and services, or to threaten to remove one part of the network because it is not self-funding. No-one ever suggests that local roads should be closed just because they have low use and the associated charges cannot pay for them to be maintained. We accept that they are part of the network and add value to the network, and pay for them from rates funding. Yet rail lines and public transport services tend not to

be viewed from a network perspective, with each bit expected to be “economic” – i.e. self-funding.

A key aim in funding decisions should be to minimise the overall cost of the network. That can be done through:

- Ensuring that existing infrastructure and services are effectively used, to avoid or delay new investments. That includes use of smart road technology, HOV lanes, removing squeeze points, removing carparks to allow effective vehicle movements, etc.
- Encouraging modal shift to under-utilised modes (e.g. moving logs from road to rail in the Wairarapa by providing a log transfer station).
- Encouraging modal shift to lower cost modes, for example from private car to public transport or to walking and cycling, freeing up the higher cost infrastructure for those that need it.
- Actively using modal shift and travel demand management to avoid the need to invest in expensive new infrastructure, e.g. by using ticket price to encourage peak spread to avoid the need to buy more trains or buses, by encouraging use of walking and cycling to address traffic congestion.

The GPS reflects an erroneous view that income from each mode should only go to that mode. For example, the GPS states that “It is unfair to ask people using the roads to fund rail infrastructure”. This is simply not true. It might be true if there were no benefit from that, but there is. For example, it was calculated that if coal was moving by road through Arthurs Pass during the peak of Solid Energy production, that would have been a truck every 30 seconds, 24 hours a day. That would have massive effects on road users in terms of travel times, safety and road maintenance delays (because roads would wear out much faster). In addition, it would be fair to have a high impact transport mode (generating hospitalisations, air pollution deaths, heavy metals into waterways, etc) contribute to measures that reduce the overall health and environmental effects of the transport system, including modal shift of freight to rail which increases fuel efficiency by around a third.

Similarly, car drivers often object to expenditure on cycling facilities, but every cyclist represents one less car competing with them for space. Portland, Oregon, managed to avoid building major new road infrastructure despite a 20% increase in journeys through the central city by achieving a 20% modal shift to cycling in the same period. That meant that the overall network was lower cost and motorists benefited from less traffic.

Revenue should be going to the overall transport network, not any specific part of it, and used for the most valuable investments in the overall network. With rare exceptions, users use the whole network. An individual might sometimes walk, sometimes take the bus, sometimes use their own car or an uber, sometimes park in the street. A freight forwarding company will sometimes send goods by road, sometimes by rail, and sometimes by coastal shipping or air. Choice is important, and choice can only be provided if there is a balanced network.

Fare box recovery has always been a contentious issue for councils. The farebox recovery rate is a measure of how much each public transport trip is being subsidised by other

sources of funding. Farebox recovery can be increased by increasing patronage on each trip, or by increasing fares, or by reducing costs in some other way. Unfortunately, increasing fares tends to reduce patronage, so may not be a long term solution, and reduced patronage will increase the costs of other parts of the transport network. The GPS should encourage improvements in fare box take, but explicitly encourage achieving that by improving patronage and spreading the peak to avoid the need to have additional services. Those measures will benefit everyone.

Spread of funding across modes and multi-modal investments

The GPS provides very explicit buckets of funds for different activities, and introduces some explicit prohibitions on including additional benefits in roading projects by prohibiting multi-modal investments within roading projects.

The GPS provides no rationale for the choices made about bucket size, nor does it provide any information on what type of service level is achievable within the funding provided (e.g. how much would rural roads be improved? What proportion of roads would be resealed regularly? Would public transport services be likely to increase or decrease?).

Without that information, it is difficult to do other than conclude that the buckets are biased towards providing for urban car commuters, which should be the lowest priority part of the network.

The ban on multi-modal investment when doing work related to roads makes no sense at all. Walkers, cyclists and buses are all road users. Footpaths, shared spaces, bus lanes, pedestrian crossings, kerb extensions, and so on are all parts of roads, not separate infrastructure. All investments in road corridors need to consider the full range of users and optimise the overall delivery for all modes. A slight adjustment in space allocation and design can turn a dangerous road into a cycle-friendly road with no negative effects on cars. A squared off intersection can make pedestrians much safer and also reduce the risk of intersection crashes. A bus lane can improve the overall capacity of the road and journey time reliability for a large proportion of the users.

An example of a negative effect of not considering other modes was the design of the new road over-bridge at MacKays Crossing, which concreted in a speed restriction for rail below the speed that the new commuter trains can achieve. This appears to have been the result of the road designers not asking the right questions rather than a rational choice.

Recommendation:

The GPS should clearly relate the size of the buckets of funding to the outcomes that are sought, and provide clear information on the likely effects on service levels for each mode, for rural roads, and for tourism destinations, of the allocations and selected RONS projects.

All restrictions on multi-modal investment should be removed from the document, and replaced with a requirement that “When funds are used under this activity class, effects of the investment on the overall network and all modes should be considered and cost-effective benefits delivered for all relevant modes.”

Rail

The GPS highlights the fact that there's been a lot of investment but freight volumes are falling. It fails to recognise that much of that investment is in addressing a history of under-investment. For example, the private owners did not replace any sleepers, leaving KiwiRail with a huge maintenance backlog. It would be more instructive to see a forward projection to see how quickly this backlog would be addressed with investment going back to BAU levels.

The GPS also fails to recognise the benefits of having freight on rail – in terms of road safety, reductions in road maintenance costs, lower emissions and fuel use, reduced impacts of congestion on freight movements, reduced noise and vibration for communities, increased overall resilience of the freight network, and so on. The value of rail investment needs to factor this in, not just focus on whether freight payments cover all rail costs.

Recommendation:

The GPS should clearly endorse the national rail plan or clearly state what changes it would like to see in the plan.

Walking and cycling

In terms of walking and cycling, the GPS states that "investment in walking and cycling should only take place where there is either clear benefit for increasing economic growth or clear benefit for improving safety and demonstrated volumes of pedestrians and cyclists already exist."

There are some significant problems with this approach.

You can't have existing high volumes of pedestrians and cyclists if they have not been catered for. For example, in one RONS hearing, locals said that they would use walking and cycling for local trips if it was safe to do so. The only route available for those trips was the state highway, and it has no shoulder and high traffic volumes and speeds. The business case for the Ngauranga to Petone walkway/cycleway identified potential to generate a significant increase in use of that corridor, because the existing walking and cycling facilities are unpleasant and unsafe.

The GPS appears to ignore the major benefits to road users of increasing pedestrian modal share. For example, in Wellington it is estimated that 30% of traffic is parents doing school runs, something which can be avoided if children are able to safely walk to school. In suburbs with walking school buses, controlled crossings outside schools, and other measures, the walking mode share can be significantly increased, which reduces congestion outside schools and has major health and cognitive development benefits for children (e.g. it has been shown that children who walk or cycle to school develop better navigation and spatial skills, as well as getting daily exercise).

It also ignores the need for investment where accessibility is compromised. One example is a Tauranga shopping centre which cannot be safely walked to from the neighbouring houses because there is no safe road crossing at all (across a state highway). That means

that residents who do not have access to a car (e.g. because their partner is using it) cannot go to the shops to get something they need without risking their lives.

The GPS appears to reflect a concern about some high cost cycleways and other projects, but service level improvements for walkers and cyclists can be provided very cheaply, particularly given recent NZTA rule changes to make tactical urbanism approaches easier to implement. There has been significant international work to identify low cost ways to reconfigure transport corridors to improve service levels for walking and cycling without impacting other road users or making major investments.

Improved service levels for pedestrians will have major benefits for New Zealand, including through:

- Reducing transport network costs. Increasing the walking mode share reduces overall transport costs. Walking is the lowest cost mode for the user (costing only a bit of shoe wear and tear) and for the transport provider (footpaths are lower cost and cheaper to maintain than roads). Up to a certain level, increasing the number of walkers improves rather than reduces the experience of the existing walkers – it increases their actual and perceived level of safety, and makes the area feel more vibrant – and does not increase maintenance costs. Furthermore, every person who chooses to walk instead of taking their car improves the experience of and safety of other car users and reduces road maintenance costs.
- Delivering economic benefits. Increased foot traffic, particularly where the walking environment is pleasant and encourages slower movements through the space, is a key predictor of how profitable a retail business will be. In walkable neighbourhoods and near walking attractions (e.g. the beach), local businesses (coffee carts, a dairy, a bakery) are more likely to develop and succeed, and they in turn will encourage more local walking trips and generate social cohesion. Pleasant neighbourhoods will also attract visitors – pensioners using their gold card to go to Devonport for brunch, Wellingtonians going to the waterfront, etc. Tourists and local visitors often arrive at a destination without a vehicle – they fly in, or get off a cruise ship, or take the bus or ferry. They will be more likely to explore and spend money if they find themselves in an attractive walking environment – a pedestrianised waterfront, a quiet shopping precinct with seats, a historic neighbourhood with shade trees and cafes.
- Improving public health. Many New Zealanders do not do daily exercise at the level that is needed to reduce their risk of preventable disease. Transport walking (walking to schools, shops, workplaces) is one of the easiest ways to ensure people get daily exercise, but walkable neighbourhoods also encourage discretionary walking – people working from home taking a quick walk to the park between online meetings, for example. Improving levels of daily exercise is a key goal for the health system, and one of the arguments for investment in sport and recreation. It is an equally valid reason for investing in walking and cycling infrastructure.
- Reducing the risk of trips and falls, particularly for elderly and mobility impaired pedestrians. Footpath maintenance can reduce the risk of trips, and regular walking will improve balance and muscle strength so a trip is less likely to lead to a fall. In the elderly, even if they do not suffer injuries, a fall can result in loss of confidence, which then reduces their willingness to walk, which can then result in further loss of

balance and muscle tone, which further increases the risk of falling. ACC has identified this negative spiral as a significant issue to be tackled.

- Improving community cohesion, resilience and security. In walkable neighbourhoods, people are more likely to know their neighbours and therefore more likely to be able to get or offer help when it is needed. Where there is high foot traffic, people feel safer, crime is less likely, and there is more likely to be someone who can take action if there is a problem. Passive surveillance by walkers is one of the best ways to reduce crimes such as burglaries and will also reduce anti-social behaviour such as intimidation and bullying, littering and dumping, and vandalism.
- Reducing social isolation. This is particularly important for people who do not have ready access to a car, but walkable neighbourhoods provide instant and safe social connections for people who do not have strong personal networks (e.g. those new to a place).

Creating walkable neighbourhoods and walking routes does not need to be expensive, particularly if urban areas and new transport corridors are designed with this in mind.

Some examples of low cost retrofits are:

- The use of tactical urbanism (e.g. planter boxes, bollards) to square corners to reduce crossing distance and risks at intersections.
- The use of tactical urbanism to provide kerb extensions or centre islands to reduce crossing distances and risks mid-block.
- Adjustments to street layouts, parking, etc to make in-road cycling safer.
- Facilitating community projects to provide shortcuts and bike trails through reserves (or private land in rural areas).
- Ensuring there is regular maintenance of footpaths to reduce trip hazards.
- Facilitating community projects to reduce barriers to walking, such as seats, signage, vegetation management, improved lighting, toilets.
- Walking school buses and identifying safe school walking routes.
- Adjusting the design of state highway margins (e.g. the shape left by the earthworks, the location of the ditch) so there is space for a community develop and maintain a walking route.
- Filling small gaps in a network that make the rest of the network less useful (e.g. adding a small section of missing footpath, or providing a safe road crossing).

So high value, low cost investments should be actively encouraged whether there are large numbers of existing walkers or not.

The GPS also states that "All investment in walking and cycling will come from the Walking and Cycling activity class, including investment in maintaining the existing walking and cycling network." This would appear to rule out low cost improvements in rural roads that would improve safety for rural walkers and cyclists, and help reduce local vehicle trips on those roads, where it is efficient to do that as part of a state highway project . It also ignores the need to provide for cyclists where that has tourism benefits, particularly where a state highway provides the connection to a national cycleway.

Recommendation:

The provisions that restrict investment in walking and cycling should be removed, and the following directions provided in the GPS:

- Road controlling authorities must ensure that there are safe walking routes for all journeys. In urban areas, walking routes should, where practicable, form a complete grid with block sizes no greater than 500m, and no greater than 300m in medium- and high-density housing areas. Walking routes need to be legally protected, either by being on public land, or through easements, and provide an appropriate service level for the likely users.
- Councils should use a range of measures to increase the walking mode share, particularly for journeys less than two kilometres and for walk-to-school journeys, to generate both transport network efficiency and public health benefits. This work should be done with public health agency and ACC involvement.
- NZTA and road controlling authorities must develop lower cost ways to provide improved service levels for walkers and cyclists, particularly to avoid the need for major expenditure of transport funds on new facilities. That would include using low-cost tactical urbanism tools, making in-road cycling safer through use of speed limits and road space allocation, and encouraging the community development of walking routes in rural areas.
- In addition to expenditure from the Walking and Cycling activity class (or, as Living Streets Aotearoa proposes, the separate Walking and Cycling activity classes), expenditure on walking and cycling should come from other classes where there is an opportunity to significantly improve walking and cycling outcomes at low cost, the provision of the walking and cycling outcomes will have benefits for an objective of the investment (e.g. improving road safety), and/or the investment will leverage significant co-investment from another party.

Road maintenance

The GPS indicates that investment by NZTA and RACs in maintenance has increased, but what has been achieved has reduced. But it provides no analysis of why – is it because costs have gone up due to things we can't control? Is it due to poor procurement management? Are we wearing out our roads faster because of more traffic, heavier trucks, etc? Or is this a measurement problem? It is not clear how this should be tackled if we don't know what the problem is.

Recommendation:

That the GPS include a clear action to identify the cause of the increased costs.

Temporary traffic management

The GPS correctly identifies this as a high cost. One roading engineer has advised that 20-75% of the cost of his projects are traffic management (more for smaller projects). While keeping road workers and road users safe is vital, much of this expenditure does not seem to be delivering benefits and may make some users less safe (e.g. pedestrians who are forced off footpaths by road signage). It is unclear whether the new prescriptive approach recently adopted by NZTA has solved this problem, and further research will be needed.

Recommendation

The GPS should clearly require that solutions to the problem still achieve safety for road workers and avoid creating new safety issues for vulnerable road users such as pedestrians.

Safety

The emphasis in the GPS on road safety is welcome. The document does not, however, explore the full range of measures that will be needed to address the problem, focusing largely on enforcement of road rules and road construction.

Other actions needed are:

- Modal shift to safer modes.
- Ensuring there is choice for people who might be a high-risk driver, and that people have good information on their level of risk.
- Improved education and licensing processes, e.g. to reduce the crash rate of motorcyclists.
- Work with businesses to improve the management of road safety risks within their health and safety systems, including use of GPS in vehicles, management of fatigue, improvement in driver habits (e.g. reducing aggressive cornering).
- Improving the safety of pedestrians and cyclists through improvements in infrastructure (including footpath maintenance to reduce trips and falls, provision of off-road cycling facilities, improved crossing facilities).
- Fixing some problems with the road rules. Of particular concern is the rule that sets a default speed limit for beaches, rivers and parks of 100 kph. Setting default speed limits is the wrong approach – all speeds should be set at safe levels.
- Ensuring that actual or perceived lack of choice is not discouraging the removal of licences from at-risk drivers (e.g. elderly drivers with developing eyesight problems).

It is also important that the focus shifts from looking at whether an individual investment will have high safety standards to whether the investment will increase safety across the whole network. A safer road that induces more traffic is going to increase crashes not reduce them.

Recommendation:

That the GPS include a general objective for reduced deaths and injuries.

That the GPS recognise that a wide range of changes are needed across the entire network to achieve a reduction in deaths and injuries, including deaths and ill-health due to indirect effects of the transport network (e.g. air pollution and effects on exercise rates).

That the GPS encourages RCAs to develop road safety and transport health strategies, with targets for reducing risk, in association with ACC and public health agencies.

Value for money and funding sources

Value for money is a key objective in the GPS and this is welcome. The previous RONS approach is a good example of New Zealand not getting good value for money.

Also welcome is the consideration of increased use of tolling, congestion charges (referred to as “time-of-use charges”) and other means to pay for transport investment. A narrow range of options has been a problem in the past.

There are two risks with the approach in the GPS, however:

- That the source of funding will skew decisions. In particular, availability of toll funding may encourage investment in roads that would be unnecessary if travel demand management tools were effectively used. This can be avoided by doing good transport planning first and then looking at how to fund the desired approach.
- That public-private partnerships of the type used overseas will lock New Zealand into high cost investments and operating costs.

One key thing missing to ensure value for money is a clear statement of what is an acceptable BCR for a project, and policies to ensure that all costs and benefits (including public health effects) are factored into decisions. The transport network is not just the place where people and goods move. It is the largest area of public space in our cities, a major driver of urban form (e.g. 50% of central Auckland is transport corridor), a major source of air and water pollution (fine particulates, heavy metals, hydrocarbons), and a major influence on social processes and public health.

As set out in an earlier section, the best value for money will be provided by consideration of all modes and effects in designing specific projects. Restrictions on multi-modal investment, and on multi-agency investments (e.g. a joint programme funded by a RCA, ACC, charitable trust and public health agency), must be avoided.

The Minister's expectations include cutting the cost of doing business cases. That is welcomed, provided it is achieved by efficiently examining projects fully, not by failing to consider important matters.

The GPS signals a change the Act to require 10 year funding plans. That would be welcome, provided the funding plans were focused on strategic outcomes for all modes, not focused on specific projects.

Recommendation:

That the GPS include a minimum BCR for major projects, of at least 3.

That the GPS actively encourage multi-mode, multi-outcome projects, including projects jointly funded from other sources.

Transport corridors and land

The GPS seeks changes to allow NZTA to improve its land acquisition practices and to be able to more easily sell land that is not required.

A problem that has developed in New Zealand over the last few decades is an accounting approach that discourages the acquisition, holding and efficient use of public land for multiple purposes.

Land can perform multiple functions at the same time, or over a long period.

Multiple uses should be the norm for most public spaces. For example, an area along a river edge could be used for walking, cycling, carparking, stormwater treatment, flood water retention, a Saturday farmers' market, and public events. Similarly, a public street in a city can be used for walking, cycling, café tables, public art, stormwater retention and treatment, invertebrate habitat, and a multitude of other benefits, if it is designed well.

Over time, land should be able to easily be shifted in use. For example, a paper road or unformed road edge might become a formed road, a carpark, a mountain biking track, a picnic area/lookout, a public park, a stormwater retention wetland, or a road maintenance depot.

The Reserves Act, as originally conceived, was designed to facilitate multiple uses of public land (by allowing bespoke local purpose and government purpose classifications) and shifts in use of land over time (through classification change). It was also designed to allow administration to be shared and moved through vestings or "control and manage" arrangements.

This approach is equally valid for road land. For example, an area next to a highway that is used periodically when major road works are being undertaken could be managed by the council as a parking/picnic area to provide public access to the adjacent bush reserve. Or road corridor space throughout a city might be used as part of a water sensitive urban design network of stormwater retention and treatment gardens and wetlands. Or a city street might also act as a public "park" with seating, gardens, public art.

The current land holding and acquisition processes for transport land do not facilitate this type of multi-use approach, or the seamless transfer of land between uses and controlling authorities. Two options for correcting this are:

- To place all transport corridor land into the Reserves Act, as a new reserve classification. Instead of road stopping processes, reclassification processes would be used where land is no longer needed for transport requirements. The land would be able to be used for multiple benefits, and aspects of management transferred to other parties (e.g. management of vegetation transferred to a community conservation group, management of historic features transferred to a historic society or iwi).
- To make it easier to transfer specific parts of transport corridors to reserve status. This would require modifications to the road stopping procedures and the ability to transfer land without a formal survey to reduce costs. That would make it easier for paper roads to become recreation reserves that continue to provide walking access (as was done by Upper Hutt recently), and for small areas of land beside state highways and railway lines that are a liability rather than an asset to be transferred for community development (e.g. as a walking route, for biodiversity, for community gardens).

The accounting systems in central government also need to make it easier for large parcels of land to be bought by one agency in areas that are likely to be subdivided in future, with

the land then progressively assigned to public uses such as roads, walking routes, reserves, stormwater management, water reservoir, schools, playing fields, etc.

Recommendation:

That the GPS signal the need for a review of how transport corridor land is held, with the aim of improving the ability to change the public outcomes being delivered by the land over time, and share management of the land between agencies to deliver multiple outcomes for the public.