Living Streets Aotearoa

www.livingstreets.org.nz

Submission from Living Streets Aotearoa

on the Discussion Paper: *Sustainable Transport – Update of the New Zealand Transport Strategy*

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About Living Streets Aotearoa

Living Streets Aotearoa (LSA) is a national organisation with a vision of "More people choosing to walk more often and enjoying public places – young and old, fast and slow, walking, sitting and standing, commuting, shopping, between appointments, for exercise, for leisure and for pleasure."

The objectives of LSA are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners e.g. walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

Living Streets Aotearoa has a network of local Walking User Groups around the country working to make city and suburban environments in their regions more walking-friendly.

For more information, please see: www.livingstreets.org.nz

Submission

Living Streets Aotearoa thanks the Ministry of Transport (MoT) for providing the opportunity to make a submission on the Sustainable Transport discussion paper. We wish to be heard in support of our submission if the opportunity arises.

Living Streets Aotearoa defines walking as including running, jogging, using a scooter or skateboard, wheelchair or walking aid. Walking is the primary mode of transport and the glue that holds the rest together. It exemplifies independence for young and elderly alike.

Summary

Living Streets Aotearoa fully supports the government's ambition for New Zealand / Aotearoa to become a carbon neutral country. This must largely be achieved by emissions reduction rather than purchases of carbon credits from elsewhere.

Living Streets Aotearoa is very supportive of the general direction expressed in the document and applauds the significant emphasis placed on sustainability proposed for the Update of the New Zealand Transport Strategy (UNZTS) as outlined in the discussion paper. Living Streets Aotearoa supports the seven guiding concepts outlined, with the caution that over reliance on new technology may prove unfounded.

At the same time Living Streets Aotearoa has several concerns in relation to the content of the paper, particularly in relation to exactly how and to what extent the proposed transport targets will be met. We believe that the desirable transport outcomes are only achievable if the urban form and financial context are significantly different from the current situation.

The targets need more intermediate targets so trends can be assessed and action taken. It may be appropriate for each region to specify how rapidly change can be expected in their region in different modes but each region must have a part to play in transforming the transport sector's effects.

Environmental behaviour change theory suggests there are several different groups of adopters[1]. The strategy doesn't refer to current behavioural change concepts.

[1] http://www.defra.gov.uk/evidence/social/behaviour/index.htm

General Comments

There is limited analysis of co-benefits or resulting costs e.g. public health and injuries.

There is limited analysis of how the different objectives could be mutually reinforcing rather than being seen as trade-offs.

The document is aspirational. We agree that targets should not follow trends e.g. fewer children are walking to school whereas the target should be a reversal of this trend. However, more clarity when targets are in contrast to existing trends would be welcome.

We recommend that walking and cycling targets be separated from each other noting that the potential users, infrastructure and supporting programmes are different.

Some targets could have perverse outcomes if met. If single occupancy car travel times were predictable this would only be if all congestion were eliminated. Perhaps a range needs to be specified. We note that apart from pedestrians having to cross roads at controlled or other crossings, our travel times are VERY predictable. If it's public transport that should be more reliable, we agree.

There is also a strong argument to reduce delay for business vehicles such as tradespeople's vans. However, avoidance of the peak hours is often sufficient. Reducing congestion for peak hour single occupancy car trips may have short term emission gains but induces more traffic and makes city centres more congested, with parking taking up an ever-growing share of land instead of commercial or residential buildings and green spaces.

The paper does not include any scenario analysis regarding future trends. Looking forward over 30 years it is obvious that there are a number of different possible scenarios, particularly around energy price and supply, technological development and the global reaction to climate change. We welcome the Land Transport Management Amendment Bill suggestion that Regional Land Transport Strategies should cast their horizons longer but recognises that the further out, the more difficult the predictions.

If funding is allocated as current shares, it's unlikely that all the targets are achievable within the proposed time frame. Improving all modes at once is an expensive way of making the problem bigger, reducing farebox recovery while appearing to "have something for everyone" given current funding levels. The cost consequences of the proposed targets on the various players including local authorities do not appear to have been considered.

The cost effectiveness of the various targets does not appear to have been examined. Given the likelihood that not all targets are immediately affordable, there is no guidance on which measures would provide the most cost effective returns in terms of achieving the goal of reducing greenhouse gas emissions, and therefore which measures would be more suitable to focus on in the short-medium term. Simply providing a menu of options is not helpful.

We would like the opportunity to have input to the drafting of the Government Policy Statement (GPS).

Technology

There is huge reliance on new low emission technology to deliver electric vehicles. We are extremely doubtful that such rapid fleet transformation will occur. We note that a wholesale change to single occupancy electric vehicles, even if that energy were wholly renewable, would still result in road deaths, injuries, congestion and discouragement of walking and other active modes.

We do agree that more electric public transport is eminently desirable in terms of less noise and pollution on the routes as well as the greenhouse gas reduction. Wellington's new trolley buses provide a good example of technology currently available, as do the plethora of different light rail and trams systems worldwide.

We note that even diesel buses produce much less carbon dioxide than private vehicles. Walking and cycling produce minimal amounts.

Road safety

The Netherlands and Germany have long recognized the importance of pedestrian and bicyclist safety[2]. We recommend the Swedish Vision Zero be adopted. This is in no way counter to more people walking and cycling but it may mean traffic speed and capacity reduction.

Whether it's 400 or 200, avoidable road death is not morally acceptable. There has been no progress during the last decade under the 2010 Safety Strategy. There were 426 deaths in the last 12 months. Hospitalisations are currently running at approximately 8,000 per annum and rising.

The UNZTS is silent on the number of injuries and the cost of deaths and injuries. While the paper notes the cost of congestion in Auckland, it does not note that the cost of death and injury in Auckland is as high as the cost of congestion, and that the cost of death and injury nationwide is higher than that of congestion. Resourcing however is more focussed on congestion.

Transport disadvantaged

Living streets Aotearoa agrees with the need to provide for the "transport disadvantaged". This does not necessarily include people who do not choose to own a private car. It should extend to better protection of footpaths and walkways from obstruction, improve accessibility for public transport stations, stops, vehicles and information as well as mobility parking. There is a role for education and also for enforcement here. Fines for parking on the footpath have been eroded in real terms.

Congestion pricing

The paper notes the importance of congestion pricing as a policy instrument in a number of places. If the government is serious about this, it should pass the appropriate legislation to enable congestion pricing to be implemented as long as the funding is used for sustainable transport rather than roading capacity increases.

[2] http://www.transalt.org/files/resources/other/010901TQpdf021.pdf John Pucher

Land use planning

Reasonable proximity between home, work and recreation is essential to sustainability and affordability. We note the infrastructural and energy costs resulting from urban expansion and that simply opening up more land as some have recommended is not the way to provide for more affordable housing.

Central government needs to consider the transport impact of location of schools, social housing, departmental offices and other facilities. A recent study[3] shows that workers in an office in Wellington have far less transport impact than in a comparable office in any of the other NZ cities.

Targets

The differences between Auckland, Wellington and Christchurch in relation to mode share are so great currently that they will need separate interim targets even if the average is the end point. We support the need to separate peak hour travel from non peak travel.

Targets need to take into account the age at which patterns and habits are set. Walking to school may not result in an immediate major greenhouse gas reduction but it enables the next generation to form the walking habit. Similarly, low fares for school students gives them experience of using that mode rather than requiring "parent-taxis".

Existing and potential walkers have a very different profile to existing and potential cyclists. While some environmental factors are important to both such as air quality, speed and volume of traffic, our needs are otherwise different. Almost everyone walks sometime and encouraging more people to choose to walk more often is different from encouraging people to take up cycling. Encouragement, infrastructure and breadth of physical ability are as different between cyclists and people on foot as between any other two modes. Therefore please set separate targets, we suggest 25% for walking and 10% for cycling – slightly more ambitious than the suggested 30% combined total for active modes.

[3] City Location Sustainability Study

Scenarios

Given the huge disagreements on likely timing of increased oil prices and different views on the rapidity of technological innovation and uptake, we suggest that work is put into exploration of different scenarios.

We note that there is far more scientific consensus on the rate of anthropogenic Climate Change and the importance of rapid action to avoid entering the realm of dangerous climate change and tipping points into very unstable climatic states. The existence of a number of positive feedback loops mean that the strategy must not merely accept current growth rates in private transport. News from the International Panel on Climate Change (IPCC) suggests the likelihood of dangerous climate change is greater rather than less, and that changes are happening more rapidly than previously forecast.

Rather than saying "these are the current trends and what's the least worst case?" we need to collectively say "We need to reduce greenhouse gas emissions by 90% by 2050, how we can do that, what does it look like, how do we get there from here?" This technique is known as "back-casting" and has been used by the Office of the Parliamentary Commissioner for the Environment, inter alia.

Much weight is given to modelling flows. These are often merely reflections of current trends and assumptions. Few models adequately address travel demand interventions other than pricing. We believe that intelligent comparison between NZ cities and overseas cities that share relevant characteristics and have made effective interventions is as useful a tool. Examples of traffic capacity reduction have often worked well despite modelling which indicated much worse outcomes.

Financial incentives

Changes to mileage allowances paid by all sectors and to salary package provision of cars and car parking would have a critical effect. Levelling the playing field so that walking and cycling allowances at a similar level are payable without disadvantage would alter behaviour by choice rather than compulsion.

For example, the Remuneration Authority refused to alter the mileage allowance for elected local government members so walking or cycling allowances could be paid. Given a free car park and a 70c car allowance per kilometre, it's financially attractive to drive rather than cycle, walk, and take the train or bus.

NZ Walking & Cycling Strategy

The Getting There – on foot, by cycle initiatives have much to offer. Encouraging walking is different to cycling and we want separate targets. While we're sympathetic, we do have differences.

We urge the Ministry of Transport to work closely with the Ministry for the Environment, Ministry of Health and other government and non government organisations to build a consensus for change in transport. Inactivity is the greatest cause of ill health [4]

Travel demand management

Environmental behaviour change theory suggests there are several different groups of adopters[5]. The strategy doesn't refer to current behavioural change concepts.

[4] http://www.dietandcancerreport.org/
[5] http://www.defra.gov.uk/evidence/social/behaviour/index.htm