

OC230529

7 July 2023

[REDACTED]

Tēnā koe [REDACTED]

I refer to your email dated 14 June 2023, pursuant to the Official Information Act 1982 (the Act), seeking:

*“... an emailed copy of all submissions made by **organisations** to the public consultation which was taking feedback in March-May 2020 on the draft Government Policy Statement on land transport 2021?”*

On June 16 2023 this request was refined, via email to you, to include responses from the following categories related to the summary of engagement for the draft Government Policy Statement on Land Transport 2021:

- *Construction, engineering and commercial sectors*
- *Road and rail groups*
- *“Other” groups*


23 submissions fall within the scope of your request and are detailed in the document schedule attached as Annex 1. This schedule outlines how the documents you requested have been treated under the Act.

The consultation for the Government Policy Statement on Land Transport 2021 responses included both survey and written responses, for ease we have copied the survey output onto Word documents for both Candor3 and NZ Heavy Haulage Association responses.

Certain information is withheld under section 9(2)(a) of the Act, to protect the privacy of natural persons.

*The Ministry publishes our Official Information Act responses and the information contained in our reply to you on the Ministry website. Before publishing we will remove any personal or identifiable information.*

Nāku noa, nā



**Tim Herbert**

Kaiwhakahaere | Manager  
Rōpu Haumi | Investment

[transport.govt.nz](https://transport.govt.nz) | [hei-arataki.nz](https://hei-arataki.nz)

## Annex 1 - Document Schedule

Doc#	Submitter	Decision on release
1	Auckland Airport	Some material withheld under section 9(2)(a) of the Act
2	Aurecon	Released in full
3	Engineering New Zealand	Released in full
4	Federated Farmers of NZ	Released in full
5	Infrastructure NZ	Released in full
6	The Aggregate and Quarry Association	Released in full
7	Transportation Group NZ	Some material withheld under section 9(2)(a) of the Act
8	NZ Port Company CEO Group	Released in full
9	Port of Napier	Some material withheld under section 9(2)(a) of the Act
10	Blind Low Vision NZ	Released in full
11	Rural Women NZ	Released in full
12	Millions of Mothers	Some material withheld under section 9(2)(a) of the Act
13	Road Transport Forum	Released in full
14	Bus and Coach Association	Released in full
15	Disabled Persons Assembly NZ Inc	Some material withheld under section 9(2)(a) of the Act
16	Healthy Families	Released in full
17	CCS Disability Action	Released in full
18	Grey Power Federation	Some material withheld under section 9(2)(a) of the Act
19	The Rail and Maritime Transport Union	Released in full
20	NZ Automobile Association	Some material withheld under section 9(2)(a) of the Act
21	Motor Industry Association	Released in full
22	Candor3	Released in full
23	NZ Heavy Haulage Association	Released in full

11 May 2020

Ministry of Transport  
PO Box 3175  
WELLINGTON 6140

Via Email: [gps@transport.govt.nz](mailto:gps@transport.govt.nz)

Attention: GPS team

To Whom it may Concern,

**Auckland Airport's Submission on the draft Government Policy Statement on Land Transport 2021/ 22 – 30 / 31**

**Background**

Auckland Airport is New Zealand's major gateway to the world, provides important connections between our cities and regions, and plays a key role in facilitating and supporting tourism and trade for the benefit of all New Zealanders. We take our responsibility as one of New Zealand's major infrastructure assets seriously, and we are conscious that the capacity and quality of our facilities directly impacts our airline and cargo customers, passengers, and the wider regional and national economies. We have a strong interest in New Zealand's transport policy settings and we welcome the opportunity to participate in this consultation.

Auckland Airport is proud of our strong track record of infrastructure investment, and we are also proud of the wide benefits that flow from airport activity – including significant job and training opportunities for our neighbouring South Auckland community as well as long-lasting prosperity for all New Zealanders through travel, trade and tourism growth.

Before the COVID-19 outbreak, Auckland Airport was accelerating one of New Zealand's largest private infrastructure investment programmes, which included material upgrades and expansions to our aeronautical operations (including a second runway and new domestic terminal), as well as to the supporting ground transport and utilities infrastructure owned and operated by the Airport. We were making good progress against this programme and many key projects were either underway or due to start construction shortly.

Although COVID-19 has had a material impact on our business and has led to incredibly tough decisions to suspend a significant portion of our infrastructure programme, our long-term plans and ambitions to build New Zealand an airport of the future remain. Auckland Airport is planning for a range of recovery scenarios, and we are still optimistic about the long-term outlook for travel, trade and tourism growth. We remain ready to restart a refreshed pipeline of aeronautical infrastructure projects based on existing and well-developed project plans when future operating and demand conditions become clearer.



As we look ahead, the full value of this future investment will only be realised by the national and regional economies if it is supported by prudent and timely investment in supporting infrastructure, much of which is publicly funded. In particular, it will be important for Auckland Airport to work closely with the Government, the New Zealand Transport Agency and Auckland Transport to ensure that future public transport options can be sensibly integrated with aeronautical infrastructure investment so that all projects can be provided in an integrated, timely and cost effective matter.

In this submission, we provide some initial observations on the topics raised in the draft Government Policy Statement on Land Transport (“GPS”).

### Submission Points

Auckland Airport generally supports the GPS. Our feedback on the consultation document is as follows:

- Economic prosperity is a fundamental consideration for future transport funding and investment. Post COVID-19, it is imperative that the GPS is reviewed to ensure that transport priorities and funding allocation is optimised to deliver value-for-money infrastructure but also infrastructure that supports both the local and national economy.
- The strategic priorities for land transport investments are supported, especially those that seek to provide people with better transport options to access social and economic opportunities and improve freight connections for economic development.
- Auckland Airport is the second largest import and export port by value, processing more than ~\$20BN worth of goods annually. In the post-COVID recovery phase, there will be a greater focus on the role cargo has to play at Auckland Airport. We are encouraged to see the priority given to improved freight connections and agree that efficient, reliable, safe and resilient freight transport within cities, between regions and to ports (and airports) is vital for economic recovery and prosperity. The GPS needs to support the movement of freight to Auckland Airport through the investment in the transport network (including State Highways) that provides improved access and greater resilience.
- Auckland Airport encourages consideration of other funding mechanisms (e.g. congestion charging) for the delivery of transport priorities. Greater clarity is also required in the GPS to support the delivery of transport infrastructure through public-private partnerships.
- Auckland Transport Alignment Project (“**ATAP**”) should be updated as necessary to align with the GPS and take into account any contributions to land transport from Budget 2020.
- It is considered that a step-change is required in the way that publicly-funded infrastructure is planned, prioritised, procured and delivered, and tangible efforts are needed to reduce hurdles that can block or frustrate infrastructure developments, particularly those of national significance or support infrastructure and/or activities of national significance.

**A**

- While the Government is consulting separately on the Draft New Zealand Rail Plan, Auckland Airport supports the development of a reliable, resilient and safe rail network that builds on and contributes to existing and proposed investment in other parts of the transport network. Auckland Airport acknowledges the investment made by the New Zealand Transport Agency (“NZTA”) and Auckland Transport (“AT”) to improve the south-western access to the Airport, including substantial upgrades to the Puhinui Station. Further investment in the rail network that is able to build on the benefits that this project will deliver will ultimately provide improved economic and social opportunities and increased economic activity.

Given the importance of transport funding and infrastructure delivery to the national economy in the post-COVID19 recovery phase, we consider ongoing engagement with the Ministry of Transport (“**MoT**”) on matters raised in this submission would be beneficial.

Any further correspondence in relation to this submission or the GPS generally should be directed to Emma Rae s 9(2)(a)

Yours sincerely,

s 9(2)(a)

Kellie Roland  
Head of Masterplanning and Transport

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## Survey Feedback:

# Draft Government Policy Statement on Land Transport (2021)

Prepared by for the Ministry of Transport



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11 May 2020

**Ministry of Transport**  
PO Box 3175  
WELLINGTON  
6140

Dear GPS Team

**Draft Government Policy Statement on Land Transport (2021):  
Survey Feedback**

We are delighted to submit herein to the Ministry of Transport our Survey feedback for your references and consideration.

Should you wish to consult with us for more expansion on the points provided in this document, please do not hesitate to reach out.

Yours faithfully,

Ian Sloane  
Transportation Industry Director, New Zealand

## SURVEY QUESTIONS

**QUESTION 2: WHO ARE YOU SUBMITTING ON BEHALF OF ?**

**AURECON NEW ZEALAND LIMITED**

**QUESTION 3: WHAT IS THE POSTCODE OF WHERE YOU LIVE OR WHERE THE ORGANISATION YOU REPRESENT IS PRIMARILY BASED ?**

**AUCKLAND, 1010**


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**QUESTION 4: DO YOU AGREE THESE SHOULD BE THE STRATEGIC PRIORITIES FOR INVESTMENT IN LAND TRANSPORT?**

<p><b>Safety</b></p> <ul style="list-style-type: none"> <li>• Yes.</li> <li>• Safety is critical and should not be limited to Road Safety as its actually linked to an overall country's wellness - greater domestic violence / unemployment / climate effects all have effects on people's behaviour.</li> <li>• However, we need to return to a cost benefit approach to make pragmatic decisions - otherwise there is a false approach to what aspects of safety we invest resources in</li> </ul>	<p><b>Better Options</b></p> <ul style="list-style-type: none"> <li>• Yes.</li> <li>• This needs to be something considered in all phases of the policy, planning and delivery process.</li> </ul>
	
<p><b>Improving Freight Connections</b></p> <ul style="list-style-type: none"> <li>• Yes.</li> <li>• In addition, as freight can be moved by different modes and off peak, the GPS should consider incentivising this behaviour</li> </ul>	<p><b>Climate Change</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• Climate change as a strategic priority aligns with the broader outcomes sought by the NZ Government. The Living Standards Framework (which includes natural capital - a risk of which is climate change) requires policies to drive the wellbeing outcomes.</li> <li>• This is a priority that should be incorporated at all levels; Policy, Planning and through-out the transport lifecycle.</li> </ul>

**QUESTION 5: DO YOU HAVE ANY COMMENTS ON THE STRATEGIC DIRECTION OF THE GPS?**

<p><b>Safety</b></p> <ul style="list-style-type: none"> <li>• We support the Road to Zero initiative/vision.</li> <li>• We acknowledge that this is an aspirational vision, with targeted 40% reduction in DSI by 2030. Systematic lead and lag indicators of progress against this target will be needed to inform progress and investment response</li> </ul>	<p><b>Better Options</b></p> <ul style="list-style-type: none"> <li>• Noting that Value for Money is embedded throughout the GPS and should be expected from any investment, we support this split of the 'Access' priority to look at movement of People separately to movement of Goods/Freight.</li> <li>• It will also be critical from 'Better Options' stand point to actively provide feedback at a masterplan level to consider things like Modal Choice / Climate Change implications on transport, the impact of disruptors in the sector based on future scenario analysis etc</li> </ul>
	
<p><b>Improving Freight Connections</b></p> <ul style="list-style-type: none"> <li>• We agree with the strategic priorities for rail &amp; coastal shipping, which will support the critical economic role of freight import, export and movement throughout NZ.</li> <li>• Similarly, this strategic priority can benefit from active provision of feedback from a masterplan level (Short / Med / Long term views of Freight and planning etc.)</li> </ul>	<p><b>Climate Change</b></p> <ul style="list-style-type: none"> <li>• Our transport system (including infrastructure and services) needs to improve wellbeing and liveability, with transport outcomes that lead to net zero carbon emissions and minimise waste.</li> <li>• A freight strategy can drive reduction in heavy vehicles and, through logistics planning, increase the use of low emission vehicles.</li> <li>• We think this needs to be a key focus at the strategic priority level with a clear framework in place to achieve the desired Climate Action outcomes through each Activity Class</li> <li>• The proposed GPS should also incorporate also include a strategy that drives and supports public transport / mass transit initiatives combined with rapid acceleration of electric vehicle usage</li> </ul>


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**QUESTION 6: DO YOU UNDERSTAND THE VALUE FOR MONEY PRINCIPLES IN THE DRAFT GPS?**

<b>Safety</b> <ul style="list-style-type: none"><li>• The GPS is not clear around this.</li><li>• In the context of Vision Zero, a cost-benefit approach should be adopted to gain a better appreciation of the potential value for money that can be derived from the associated risks.</li><li>• There needs to be a clear description of what Global best practice looks like from a Transport context.</li></ul>	<b>Better Options</b> <ul style="list-style-type: none"><li>• More practical application would be required from a 'Better Options' context.</li></ul>
<b>Improving Freight Connections</b> <ul style="list-style-type: none"><li>• The Value for Money principals are clear, however an economic set of KPIs can be developed for this.</li></ul>	<b>Climate Change</b> <ul style="list-style-type: none"><li>• It is our view that this can be done with a cost-benefit approach to climate change</li></ul>



**QUESTION 7: DO YOU HAVE ANY OTHER COMMENTS TO MAKE ON THE PRINCIPLES FOR INVESTING?**

- The principles ensure the value for money equation considers climate change as a strategic priority. For climate change mitigation to be effective we need these consistent policies, risk mitigation plans, including monitoring and reporting.
- These principles can provide for sustainable outcomes in hard infrastructure, from designing out waste, to strategies in keeping materials in use (re-use, recycle), minimising waste and making the most of resources and materials

**QUESTION 8: DO YOU AGREE THAT FUNDING TO SUPPORT ROAD TO ZERO ACTIVITIES (SUCH AS SAFETY INFRASTRUCTURE, ROAD POLICING, AND ROAD SAFETY PROMOTION) SHOULD COME FROM A SINGLE ACTIVITY CLASS?**

- No.
- In view of the fact that roads are the most common element of transport, we believe that it should be funded from multiple classes

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**QUESTION 9: DO YOU AGREE THAT THE GPS SHOULD FUND MAINTENANCE AND RENEWAL OF THE RAIL FREIGHT NETWORK?**

- Yes. (Conditionally)
- The rail freight network is most effectively viewed from a national perspective to achieve its most effective use, which is long haul, high volume freight movement. This activity class provides an opportunity to start to shape the freight transport network around this mode. However, it is noted that funding for the Rail Network activity class is very limited and is unlikely to achieve the high mode shift from road to rail that is desired.

**QUESTION 10: DO YOU AGREE THAT THE GPS SHOULD FUND COASTAL SHIPPING?**

- Yes. (Conditionally)
- As with rail freight, the coastal shipping network is most effectively viewed from a national perspective to achieve its most effective use, which is long haul, high volume freight movement.
- This activity class provides an opportunity to better integrate this mode with the national freight transport network. It's funding out of the GPS should focus on supporting the land use and multi-modal infrastructure that will integrate it with the road and rail transport networks.

**QUESTION 11: CONSIDERING THE INFORMATION ABOVE, WOULD YOU SUPPORT INCREASING OR DECREASING THE FUNDING LEVELS FOR ANY ACTIVITY CLASSES. PLEASE INDICATE ANY CHANGES IN THE TABLE BELOW**

Activity Classes	Decrease GPS allocation	Retain GPS allocation	Increase GPS allocation
Road to Zero		x	
Public Transport Services		x	
Public Transport Infrastructure			x
Walking & Cycling Improvements		x	
Local road Improvements		x	
State Highway Improvements			x
State Highway Maintenance		x	
Local Road Maintenance		x	
Investment Management		x	
Coastal Shipping		x	
Rail Network			x

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**QUESTION 12: INCREASING FUEL EXCISE DUTY (AND EQUIVALENT ROAD USER CHARGES) BY ONE CENT PER LITRE GENERATES AROUND \$50 MILLION IN REVENUE EACH YEAR FOR THE NLTF. THE DRAFT GPS DOES NOT PROPOSE AN INCREASE TO FUEL EXCISE DUTY OR ROAD USER CHARGES FOR THE NEXT THREE YEARS. WOULD YOU SUPPORT AN INCREASE TO PROVIDE MORE FUNDING TO INVEST IN ANY OF THE ACTIVITY CLASSES?**

- Yes, on condition that the dynamic congestion charging is intended to promote behaviour change.

**QUESTION 13: DO YOU HAVE ANY OTHER COMMENTS ON ACTIVITY CLASSES IN THE DRAFT GPS 2021?**



**Safety**

- Land Transport related Health, Safety & Wellness performance is continuously impacted by a large number of variables and must be iteratively reviewed to ensure optimal investment options.

**Climate Change**

- Additional funding is likely to be required to transition to a greener, lower carbon economy. With vehicular transport being one of the major contributors to emissions, this creates a challenge to overcome, but also an opportunity to apply circular economy thinking to innovative solutions.

**QUESTION 14: DO YOU HAVE ANY OTHER FEEDBACK ON ANYTHING ELSE IN THE DRAFT GPS?**

**Better Options**

- The draft depicts a refined funding allocation model and does not appear to infer to any significant/new innovations.

**Climate Change**

- Climate change can lead to more frequent and severe weather events, with costs and disruption to critical infrastructure such as roads and rail increasing.
- The NCTIR project has demonstrated how a focus on climate change can create resilient infrastructure and resilient infrastructure and providing solutions to recover and reinstate the infrastructure post event.

**QUESTION 15: DO ANY OF YOUR RESPONSES CONTAIN COMMERCIAL SENSITIVE INFORMATION ? PLEASE SELECT QUESTION NUMBER(S) IT'S INCLUDED IN:**

	Yes	No
Question 5		X
Question 7		X
Question 13		X

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# SUBMISSION: DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2021

Engineering New Zealand (formerly IPENZ) is New Zealand's professional home for engineers. We are New Zealand's strongest and most influential voice on engineering issues, with more than 22,000 members who want to help shape the public policy agenda and engineer better lives for New Zealanders.

The Transportation Group New Zealand is a Technical Interest Group of Engineering New Zealand, comprised of approximately 1,200 members. Members are largely transportation engineers and planning professionals working within Government, academia and the private sector. The Transportation Group has submitted separately to the Ministry of Transport on the Government Policy Statement on Land Transport 2021 (GPS – LT 2021). Engineering New Zealand supports that submission and will reflect on some of the Transportation Group's key points in this submission.

Furthermore, Engineering New Zealand has worked with the Railway Technical Society of Australasia (RTSA) to submit on the draft New Zealand Rail Plan, which is also out for consultation and referenced in the draft GPS – LT 2021. This submission references our submission on the draft New Zealand Rail Plan.

## **WE SUPPORT THE DRAFT GPS - LT 2021**

Thank you for the opportunity to provide comment on the draft GPS – LT 2021. We support the strategic priorities of the draft GPS – LT 2021, noting the significant change in direction from the GPS – LT 2018. We commend the focus on wellbeing and enhancing liveability of spaces as outlined in the Outcomes Framework. We support the four strategic priorities outlined: safety, better travel options, improving freight connections and climate changes.

## **WE SUPPORT THE INCLUSION OF RAIL IN THE GOVERNMENT'S POLICY STATEMENT**

The inclusion of rail in the GPS – LT is new and a welcome signal of the Government's intent to prioritise investment in rail. We also consider that rail's inclusion in the GPS – LT 2021 signals a wider commitment to the consideration of rail in supply chain management, as well as the role of rail in supporting a safer, more economic and sustainable multi-modal transport sector. We commend this approach.

## WE SUPPORT THE PRIORITISATION OF MASS TRANSIT

In line with the Transportation Group's submission, we strongly support the GPS – LT 2021's prioritisation of funding for public transport services and public transport infrastructure. One of the recommendations of Engineering New Zealand's thought leadership work, [Engineering a Better New Zealand](#), is the prioritisation of mass transit. We have previously stated:

Let's make space for mass rapid transit along development corridors in urban centres and consider the feasibility of light rail, road trams and, where appropriate, heavy rail. But, crucially, we need to avoid the politicisation of transport projects by holding to a clear vision if we want to deliver the best results for New Zealand. The traffic, road, and civil engineers and traffic planners have to be given objectives and allowed to propose the best way forward together.

We consider the focus of GPS – LT 2021 on public transport systems and infrastructure supports this vision for a better New Zealand.

## WE SUPPORT MODE SHIFT INITIATIVES

We are encouraged by the attention in the GPS - LT 2021 to accelerating transportation mode shift. We support this direction and would like to see bold methods for achieving this. We agree that local government, business and communities will all need to play a part but that the Government should take a strong lead using regulatory tools and investment to influence travel demand and transport choices.

We support the Government's focus on positioning public transport, walking and cycling as attractive transport options. To that end we support, in principle, the raising of revenue from fuel excise duty and equivalent road user charges to appropriately reflect to the true cost of road use and to drive urban change. To effectively achieve good outcomes for all New Zealanders, we consider the use of smart road pricing must be balanced by the availability of alternative transport options.

To this regard, we support the Transportation Group's recommendation of using fuel excise duties and road user charges to increase funding allocations for public transport, walking and cycling.

## WE SUPPORT THE INCLUSION OF CLIMATE CHANGE AS A STRATEGIC PRIORITY

We are heartened to see climate change as a strategic priority of the GPS – LT 2021. As stated in the GPS – LT 2021, transport accounts for nearly 20 percent of New Zealand's domestic greenhouse gas emissions. Any plan to reduce New Zealand's emissions will need to consider transport and the infrastructure we will need for New Zealand to transition to a low carbon transport future.

Engineering New Zealand supports the [Climate Change Response \(Zero Carbon\) Bill 2019](#). We believe the inclusion of climate change as a strategic priority in the GPS – LT 2021 supports the Zero Carbon Bill and is a bold, long-term vision. We look forward to the work of the Ministry of Transport, and other agencies, to reducing emissions. We consider the GPS – LT 2021 appropriately positions the sector to respond to the carbon budget requirements coming in 2021 (as per the work of the Climate Change Commission).

## WE SUPPORT INVESTMENT IN ROAD SAFETY THAT IS BASED ON BEST PRACTICE EVIDENCE

One of the key considerations of the Transportation Group's submission on the GPS – LT 2021 is the embedding of road safety interventions in best practice evidence. The Transportation Group stated in their submission "regardless of how road safety activities are funded... **all investment** in road safety should all be

based on strong and consistent evidence about the potential for harm reduction". We support the Transportation Group's recommendation to the Ministry of Transport, recognising that investment in road safety is often highly politicised, possibly to the detriment of outcomes.

Furthermore, we support the focus in the GPS – LT 2021 on enhancing the safety and accessibility of footpaths, bike lanes and cycleways, as this will further drive down road demand and encourage alternative mobility options.

## CONCLUSION

As outlined in this submission, we support the direction the Ministry of Transport has set through the GPS – LT 2021. We support the strategic priorities outlined in the GPS – LT 2021, particularly the focus on better travel options, including mass transport options. We are encouraged by the inclusion of rail in the GPS – LT 2021 and consider this will support supply chain management and a sustainable multi-modal transport sector.

Engineers are at the forefront of the work needed to drive change and innovation in New Zealand's transport sector. As such, we would value the opportunity to be involved in the ongoing conversation. If we can be of additional support, please do not hesitate to contact Jodi Caughley, Policy and Projects Lead at Engineering New Zealand ([jodi.caughley@engineeringnz.org](mailto:jodi.caughley@engineeringnz.org)).

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# Submission on *Government Policy Statement on Land Transport 2021-2031* draft for engagement

Federated Farmers of New Zealand  
13 May 2020

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## SUBMISSION ON GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2021-2031 DRAFT FOR ENGAGEMENT

TO: GPS Team  
Ministry of Transport  
[gps@transport.govt.nz](mailto:gps@transport.govt.nz)

DATE: 13 May 2020

### ADDRESS FOR SERVICE

Name	Position	Phone Number	Email Address	Postal Address
Jacob Haronga	Senior Policy Advisor	027 803 0306	<a href="mailto:jharonga@fedfarm.org.nz">jharonga@fedfarm.org.nz</a>	P O Box 715, Wellington 6140

### OTHER CONTACTS

Karen Williams	Federated Farmers Board Member	027 243 3725	<a href="mailto:kwilliams@fedfarm.org.nz">kwilliams@fedfarm.org.nz</a>	PO Box 715 Wellington 6140
Nick Clark	Manager – General Policy	021 217 6731	<a href="mailto:nclark@fedfarm.org.nz">nclark@fedfarm.org.nz</a>	P O Box 20448, Christchurch 8543

### ABOUT FEDERATED FARMERS

Federated Farmers of New Zealand is a membership organisation, which is mandated by its members to advocate on their behalf and ensure representation of their views. Federated Farmers does not collect a compulsory levy under the Commodities Levy Act and is funded from voluntary membership.

Federated Farmers represents rural and farming businesses throughout New Zealand. We have a long and proud history of representing the needs and interests of New Zealand's farmers.

Federated Farmers aims to empower farmers to excel in farming. Our key strategic outcomes include provision for an economic and social environment, within which:

- (a) Our members may operate their business in a fair and flexible commercial environment;
- (b) Our members' families and their staff have access to services essential to the needs of a vibrant rural community; and
- (c) Our members adopt responsible management and sustainable food production practices.

**SUBMISSION TO THE MINISTRY OF TRANSPORT ON THE GOVERNMENT POLICY  
STATEMENT ON LAND TRANSPORT DRAFT FOR ENGAGEMENT**

**1. INTRODUCTION**

- 1.1 Federated Farmers of New Zealand welcomes the opportunity to submit to the Ministry of Transport on the *Government Policy Statement on Land Transport* draft for engagement (GPS 2021).
- 1.2 The Federation has extensive experience advocating the interests of farming and other rural businesses, as well as those of rural communities on matters related to transport infrastructure and how it is funded. We have previously submitted on road funding consultations, such as the *Government Policy Statement on Land Transport* in 2017 and 2018 (GPS 2018), and continue to do so in local council annual and long-term planning processes across the country. We have also contributed to the work of Road Controlling Authorities on producing *Guidelines for Equitable Funding of Pavement Maintenance of Low Volume Roads* in 2017, and submitted on the *Road to Zero 2020-2030 Road Safety Strategy* in 2019.
- 1.3 Transport infrastructure is fundamental to the underlying strength of farm businesses, viability of rural communities and prosperity of regional economies. The physical movement of people and goods is especially important in rural areas where the population is more thinly dispersed and frequently requires that greater distances need to be travelled than would be common among more densely populated urban areas.
- 1.4 Sustainable investment in the roading network is of particular interest for our members at this time given the concerning state of many local roads and bridges and uncertainty around improvements to regional highways. Many local roads have been allowed to deteriorate and local bridges to exceed their designed lifetime with inadequate resourcing from both central and local government. Local roads are lifelines for many rural communities allowing access to support the economic, social, cultural wellbeings of those that live, work and play outside of urban areas. Large-scale public transport initiatives in urban areas have also assumed a greater priority in recent years in transport funding decision-making than proceeding with previously-announced improvements to many vital regional highway connections.
- 1.5 The COVID-19 pandemic and resulting public health measures have had a marked effect on the economy, and will continue to do so for some time as the country grapples with the effects of a global recession. The effects on agriculture have been less so than for other sectors of the economy in recognition of its status as an essential service that provides food for New Zealanders, supports continuing regional employment, and earns much needed export income. The effects on other sectors of the economy is expected to have a negative impact on the resourcing of local councils and their ability to contribute the local share to roading projects in the years to come. Most local councils have recently adjusted their annual plans and reduced proposed rates increases in recognition of the changed circumstances of their respective ratepayer bases.
- 1.6 The government has previously announced significant investments in the roading network through large-scale projects under the New Zealand Upgrade Programme. Stimulus initiatives are expected to soon announce further funding for shovel-ready roading projects. Indications from some local councils of bids for stimulus funding of roading projects is that there is an urban focus on projects of limited benefit to rural businesses and communities. The delivery of public benefits and regional

employment are emerging as some of the considerations important to the government from its stimulus initiatives. Improved maintenance of local roads and bridges and improvement of regional highways arguably deliver strongly on both those considerations.

- 1.7 Local government has for many years now struggled to sustainably fund the local share of local roading projects. The ministry's write-up of the regional workshops held with councils and other regional stakeholders helpfully describes these struggles in terms of both the limitations of ratepayer funding and capability issues in councils' meeting ministry requirements for project business cases. COVID-19 has had a significant impact on local government revenue and will continue to do so in the years to come. Central government funding of local roading projects and reform of the requirements of councils in accessing that funding must be undertaken in light of these heightened circumstances.
- 1.8 The funding limitations on both local government and their restriction to property value as a method of taxation creates substantial distortion and does not reach all road users. Invariably, in the case of predominantly rural councils, this burden falls on farmers and other land-users with little maintenance or improvement seen to the roads they rely upon.
- 1.9 As such, the GPS 2021 has an important role to play in supporting wider government initiatives in a way that better addresses the needs of rural people. This can only happen with greater priority being given to funding for the maintenance of local roads and bridges and improvement of regional highways.

## **2. SUMMARY OF RECOMMENDATIONS**

- 2.1 Federated Farmers of New Zealand recommends that:
  - 2.1.1 Road maintenance and improvement is recognised as a specific action for improving the safe use of roads under the *Safety* strategic priority.
  - 2.1.2 Introducing a specific focus on the uptake of public transport and other alternative modes of transport under the *Better Travel Options* strategic priority is a welcome improvement to GPS 2021.
  - 2.1.3 The economic importance of supporting regional primary production under the *Improving Freight Connections* strategic priority is given more weight in the funding levels indicated under relevant activity classes.
  - 2.1.4 The focus on reducing transport emissions through improved use of public transport and other alternative modes of transport, where relevant, under the *Climate Change* strategic priority is supported.
  - 2.1.5 GPS 2021 is reviewed and reframed to have regard for its relevance alongside other investment approaches by central government in road transport projects.
  - 2.1.6 The principles for investing under GPS 2021 are reviewed and reframed to provide greater priority to and funding for the maintenance of local roads and bridges to a safe standard and improvement of regional highways.
  - 2.1.7 The quantum of and rate of increase in funding for *Local Road Maintenance* is reconsidered and increased.

- 2.1.8 The quantum of and rate of increase in funding for *Local Road Improvements* is reconsidered and increased.
- 2.1.9 That *Crown funding for land transport* be reviewed and reframed to have regard for the changed circumstances of local authorities to fund the local share and greater reliance on funding from central government for road transport projects.

### 3. ROLES AND RESPONSIBILITIES

- 3.1 The Federation has no feedback to provide on the role of GPS 2021 or descriptions of the responsibilities of the various agencies involved.

### 4. STRATEGIC PRIORITIES

#### *Safety*

- 4.1 The safe use by all of rural roads and bridges is essential for the economic resilience and sustainability of rural communities and regional economies. Rural roads do not solely service rural people. In many parts of the country, much of the traffic along rural roads are access routes also supporting travel to popular destinations from people outside the area. In essence, rural roads are for all rural users.
- 4.2 The inclusion of *Safety* as a strategic priority in GPS 2021 is a timeless and ongoing objective. From our reading of the section describing *Safety*, this appears to be entirely guided by the *Road To Zero 2020-2030 Road Safety Strategy* that was released in 2019.
- 4.3 In its submission on the *2020-2030 Road Safety Strategy*, the Federation raised several concerns around its fitness-for-purpose for rural situations. Proposed actions under the strategy and those outlined in this section disregard the economic vitality of rural communities by ignoring the years of underfunding in rural road maintenance in many districts.
- 4.4 The description of infrastructure safety treatments and desire to tackle unsafe speeds suggest an intention to only engineer and improve roads with highest risk and economic importance leaving many roads to degrade by simply reducing the speed limit rather than maintaining or improving these roads to a safe standard.
- 4.5 There is a clear failure of GPS 2021 to account for ageing parts of the roading network as a safety issue, nor does it appear that the maintenance and upgrade of rural roads and bridges to a safe standard relates to any of the described actions in this section.
- 4.6 This section needs to take a broader approach to road safety that has regard for investments that improve safety beyond those described in the *Road To Zero 2020-2030 Road Safety Strategy*. Doing so is entirely consistent with the interlinkages between strategic priorities.

**Recommendation: that road maintenance and improvement is recognised as a specific action for improving the safe use of roads.**

### *Better Travel Options*

- 4.7 This section partially replaces what was the strategic priority *Access* in GPS 2018 with a focus on public transport and realising the social and environmental benefits of public transport and other alternative modes of transport.
- 4.8 The reality for rural road users is that these considerations are largely urban ones given the impracticality and unsustainability of public transport and other alternative modes of transport in rural areas. Rural road users do not, however, restrain themselves to only travelling along rural roads.
- 4.9 More specific focus on reducing congestion in urban centres by moving more people to use public transport and other alternative modes of transport is welcome.

**Recommendation : that introducing a specific focus on the uptake of public transport and other alternative modes of transport is a welcome improvement to GPS 2021.**

### *Improving Freight Connections*

- 4.10 This section partially replaces what was the strategic priority *Access* in GPS 2018 with a focus on economic benefits that come with the movement of goods around the country.
- 4.11 It is helpful that the importance of regional primary production to the national economy is specifically mentioned as a consideration of *Improving Freight Connections* as a strategic priority.
- 4.12 Prior to the economic impact of COVID-19, over 350,000 New Zealanders (or one in seven people) were directly employed on farms and in downstream processing and support businesses. Rural businesses tend to be thinly-dispersed across wide geographic areas often necessitating the movement of their workforce and support services along greater distances than the average urban commute.
- 4.13 For the year ended June 2019, these sectors contributed over \$46.4 billion in export revenue (2019) and collectively accounted for 11% of New Zealand's GDP. This is likely to increase with travel restrictions in place for regional travel and continuing for some time for international travel affecting economic contributions from tourism, events and other sectors.
- 4.14 While it is welcome that this section recognises the importance of regional primary production, it does not appear that *Improving Freight Connections* is given adequate weight as a strategic priority in the funding levels indicated under relevant activity classes.

**Recommendation: that the economic importance of supporting regional primary production under the *Improving Freight Connections* strategic priority is given more weight in the funding levels indicated under relevant activity classes.**

### *Climate Change*

- 4.15 Federated Farmers supports the reduction of greenhouse gas emissions, with a particular emphasis on the reduction of carbon dioxide emissions as a priority of central government mitigation efforts. *New Zealand's Greenhouse Gas Inventory*

report released in April 2020 shows that greenhouse gas emissions from the transport sector have increased 101.6% between 1990-2018.

- 4.16 The focus in this section on improving uptake of public transport and other alternative modes of transport is welcome. The climate change benefits and public health co-benefits are more clearly evident in actions that address the effects of inefficient urban transport than other approaches the government has previously considered.

**Recommendation : That the focus on reducing transport emissions through improved use of public transport and other alternative modes of transport under the *Climate Change* strategic priority is supported.**

## 5. FUNDING LAND TRANSPORT

- 5.1 This section describes several actions and expectations of central government to support investment in road transport projects that will deliver on strategic priorities and measures for success under GPS 2021.
- 5.2 This section specifically mentions the ministry is considering new and innovative funding approaches to road transport projects given experiences with announced funding for Auckland and Wellington is welcome. Likewise, the development of a toolkit to support new funding options for the funding and financing of road transport projects is important in a time of significantly reduced local government revenue and heightened financial challenges faced by ratepayers. Most local authorities have adjusted annual plans currently out for consultation to reduce proposed rates increases and implement other measures to support ratepayers. This necessarily affects the ability of local authorities to contribute the local share on the same basis as was expected prior to the COVID-19 pandemic.
- 5.3 Reliance on investment from central government for road transport projects will be the reality for years to come. As such, it would be wholly appropriate for the funding levels indicated in activity classes to be reviewed considering the changed economic circumstances around the country.
- 5.4 Ministers have repeatedly mentioned in recent public statements and comments a willingness to invest in known large-scale projects. The Infrastructure Reference Group is known to be considering approximately 2,000 bids for funding from central government for infrastructure projects, of which a subset is expected to be road transport projects.
- 5.5 While understandable, given the economic circumstances of the COVID-19 pandemic, that ministers would prefer the direct funding approach, it is difficult to see how this will support delivery on GPS 2021 strategic priorities and outcomes..
- 5.6 The expected investment of \$4 billion in funding from central government under GPS 2021 pales somewhat against the quanta announced by ministers as part of economic stimulus measures. As such, this section needs to be reviewed and reframed to better describe its place as a funding mechanism for road transport projects in what is becoming an increasingly cluttered investment environment.

**Recommendation : That GPS 2021 is reviewed and reframed to have regard for its relevance alongside other investment approaches by central government in road transport projects.**

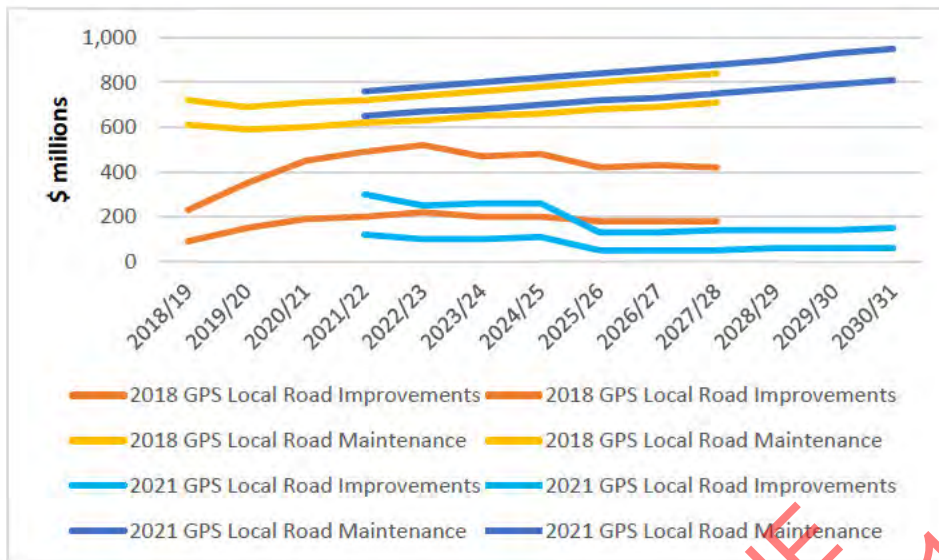
*Principles for investing*

- 5.7 *Alignment, Effectiveness* and *Efficiency* seem reasonable considerations as principles for investments under GPS 2021. That said, additional considerations like public benefit and being 'shovel-ready' have emerged in response to the COVID-19 pandemic.
- 5.8 This submission has earlier mentioned the dire need for central government investment to address the legacy of underinvestment in rural roads and bridges and postponement of previously-announced commitments to improve regional highways.
- 5.9 These types of projects arguably meet these emerging considerations and are clearly a factor in wider government expectations of central government investment in infrastructure projects. There are clear public benefits from bringing local roads and bridges to a safe standard and improvements to regional highways. Those local roads and bridges in need of attention are undoubtedly well-known to local authorities and would require little more than funding approval for work to proceed in a 'shovel-ready' manner. Likewise, many improvements to regional highways had previously been assessed and taken to a point where funding had been approved for work to proceed.
- 5.10 It therefore makes sense for the principles for investing under GPS 2021 be reviewed and reframed to provide greater priority to and funding for the maintenance of local roads and bridges to a safe standard and improvement of regional highways.

**Recommendation : That the principles for investing under GPS 2021 are reviewed and reframed to provide greater priority to and funding for the maintenance of local roads and bridges to a safe standard and improvement of regional highways.**

*Activity class framework*

- 5.11 *Local Road Maintenance* and *Local Road Improvements* are activity classes of particular interest to our farmer members for being those activities most closely relevant to addressing the underinvestment in local roads and bridges.
- 5.12 We have looked at the indicated funding for these two activity classes proposed under GPS 2021 and compared those funding levels to those earlier indicated in GPS 2018 in the graph below. This was done to better assess the extent to which GPS 2021 adequately recognised the need for investment in local roading infrastructure over the same general time period.



- 5.13 While it appears that funding has increased for *Local Road Maintenance*, the increase could not be described as significant, let alone 'generous'. That funding in this activity class is forecast to increase over time is welcome, but the quantum of and rate of increase in funding proposed for *Local Road Maintenance* does not suggest rural roads and bridges are likely to be brought up to a safe standard in a particularly timely manner. Failure to do so would run counter to GPS 2021 successfully delivering on its strategic priorities of *Safety* and *Improving Freight Connections* and run counter to more recent considerations of central government investment in infrastructure projects of public benefit and being 'shovel-ready'.

**Recommendation : That the quantum of and rate of increase in funding for *Local Road Maintenance* is reconsidered and increased.**

- 5.14 The situation for *Local Road Improvements* is somewhat different. For reasons not easily understood from GPS 2021 or the *GPS Transitions Guide* support document, GPS 2021 proposes a significant decrease in funding for this activity class in the years to come. One might assume this is because funding for safety improvements to local roads have instead been reclassified under the new *Road to Zero* activity class. That would, however, suggest that funding for *Local Road Improvements* largely went towards road safety investments under GPS 2018, rather than improvements that necessarily brought local roads up to a safe standard.

- 5.15 Either way, it would not appear that funding indicated for the *Local Road Improvement* activity class will do little to fund improvements that bring local roads up to a safe standard.

**Recommendation : That the quantum of and rate of increase in funding for *Local Road Improvements* is reconsidered and increased.**

#### *Delivering Government Commitments*

- 5.16 The Federation has no particular feedback to provide on the descriptions of how GPS 2021 will support commitments the government have made towards road transport projects separate to GPS 2021.



*Crown funding for land transport*

- 5.17 This section is largely empty in anticipation of an allocation being confirmed under Budget 2020.
- 5.18 This section would benefit from commentary describing how GPS 2021 will have regard for significantly reduced local government revenue and heightened financial challenges faced by ratepayers as a consequence of the COVID-19 pandemic. This situation necessarily affects the ability of local authorities to fund the local share of roading projects on the same basis as would have been expected prior to the COVID-19 pandemic.
- 5.19 As such, it is important that these changed circumstances and greater reliance on funding from central government for road transport projects are reflected in this section of GPS 2021.

**Recommendation : That *Crown funding for land transport* be reviewed and reframed to have regard for the changed circumstances of local authorities to fund the local share and greater reliance on funding from central government for road transport projects.**

*Statement of Ministerial Intentions*

- 5.20 The Federation has no particular feedback to provide on the Minister's expectations of behaviours required from Waka Kotahi / New Zealand Transport Agency to support the implementation of GPS 2021.

**ENDS**

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11 May 2020

Ministry of Transport  
Attn: GPS team

Per email: [gps@transport.govt.nz](mailto:gps@transport.govt.nz)

Infrastructure New Zealand is the peak industry body for the infrastructure sector and promotes best practice in national infrastructure development through research, advocacy and public and private sector collaboration. Infrastructure New Zealand members come from diverse sectors across New Zealand and include infrastructure service providers, investors, and owners.

This submission represents the views of Infrastructure New Zealand as a collective whole and may not necessarily represent the views of individual member organisations.

## **Infrastructure New Zealand submission on the Draft Government Policy Statement on Land Transport (2021/22-2030/31)**

Infrastructure New Zealand has reservations about the Draft Government Policy Statement on Land Transport (2021/22-2030/31), particularly around the impact of the COVID-19 lockdown and recession on the transport system.

The impacts of COVID-19 are still highly uncertain, particularly for transport, and interim measures to extend the prior GPS or introduce an interim short-term GPS may be appropriate.

This would provide the funding certainty that the transport system needs, while staying relevant to the unknown future for transport.

The COVID-19 lockdown and recession does provide a unique opportunity to rethink New Zealand's transport and larger land-use allocation system. A regional spatial planning approach, in concert with ongoing resource management reform, would provide an effective, outcomes-based, and equitable transport system.

### **The elephant in the room: COVID-19**

The COVID-19 lockdown and recession hit transportation and mobility more than almost any other part of life in New Zealand. The Alert Level 4 lockdown was, fundamentally, a halt to personal mobility in this country.



The long-term impacts of the lockdown and recession are of unknown size, scale, duration, and type. Are our empty roads a sign of excess capacity? Will we need increased freight capacity as retail moves online? Will public transport be hurt by long-term social distancing or an increase in working-from-home?

We note that the GPS process and the long-term planning process for regional and local councils provides necessary clarity on the next three years of transport investment.

Certainty is urgently needed, but the Draft GPS may not be able to totally provide this, given the significant downside risk to National Land Transport Fund (NLTF) revenues due to falling petrol tax and road user charges, lower public transport revenue, and reduced vehicle registrations.

The Draft GPS fails to address these risks and in doing so may provide decision-makers in local councils and Waka Kotahi NZ Transport Agency (NZTA) with *less* confidence in the usefulness of the National Land Transport Programme (NLTP) and GPS, not more.

While stimulus spending from central government is widely anticipated for transport projects around the country, it is unclear how this should or will integrate with the Draft GPS being consulted on.

The GPS on Land Transport would be more relevant and useful if it addressed the NLTF revenue and investment risks resulting from the crisis.

We recommend that the Government consider alternative arrangements to the GPS process such as introducing an interim 'COVID-19 Response GPS' for one or two years or making emergency legislative amendments to extend the previous GPS (and concomitant local authority long-term planning processes) by one or two years.

An interim or extended GPS would need to address the NLTF revenue uncertainty head-on and be suitably flexible and adaptable to however the future may unfold.

### Let's not waste a crisis

While the COVID-19 crisis has wreaked havoc on transport revenue and its matching investment, it provides a once in-a-generation opportunity to rethink and reform the way we plan transport in this country.

The economic impacts of the COVID-19 lockdown are closely linked to the lack of mobility. Even at Alert Level 3 lockdown, with construction, and other safe working returning, the inability for New Zealanders to move has a -25% impact on our GDP.<sup>1</sup> Social and cultural outcomes may be similarly severe.<sup>2</sup>

Transport is the lifeblood of our economy and society.

It should therefore be integrated and planned in concert with the rest of our economy and society.

The Government should use this opportunity to trial a regional partnership scheme which would empower regions to plan transport and other land uses collaboratively and at pace to meet Government targets.

These partnerships could work in alliances that mirror the fast-acting and effective strategies that built back better in the wake of the Christchurch and Kaikōura earthquakes.

These partnerships could last for a two-year period. However, similar to how accelerated consenting being advanced by the Government will be followed by substantive resource management reform, these partnerships should be followed-up with comprehensive reform.

If the Government wants to use this crisis to guide transport investment and planning, it can take this chance to fully rethink the process.

### Building Regions: Regional spatial planning partnerships

There are several key issues in the current transport planning system:

1. Transport planning is disconnected between modes and between other land uses
2. The system favours arbitrary outputs over substantive outcomes
3. Cost and benefits are unequally borne

The result of these issues is that our transport system is highly politicised, unnecessarily expensive, excessively congested, and with insufficient and poorly used capacity across all modes.

Addressing these issues will require a reorientation of the planning system around integrated spatial planning, clear outcomes, and sustainable funding.

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<sup>1</sup> New Zealand Treasury (13 April 2020) *Treasury Report T2020/973: Economic scenarios*. Available at: <https://treasury.govt.nz/publications/tr/treasury-report-t2020-973-economic-scenarios-13-april-2020-html#section-5>

<sup>2</sup> Sir Peter Gluckman and Dr Anne Bardsley (April 2020) *The Future is Now: Implications of COVID-19 for New Zealand* (Koi Tū: The Centre for Informed Futures). Available at: <https://informedfutures.org/social-cohesion-in-a-post-covid-world/>

The details of this proposal are outlined in our recent report *Building Regions: A vision for local government, planning law and funding reform*.<sup>3</sup>

### Integrated spatial planning

Although transport is intimately tied to other land uses, it remains largely planned independently. This creates problems when cities choose to increase development in places with insufficient transport capacity, or when transport links are built in places where development restrictions which impede transport utilisation.

These problems are not unique to transport. Water, telecommunications, electricity and social infrastructure is similarly challenged.

Disconnected planning is inefficient, costly, and unnecessarily slows progress. It aggravates land price inflation and exacerbates congestion, school shortages, and hospital upkeep.

Poorly integrated planning and infrastructure not only impedes aligned development, it impacts the relationship between the users, beneficiaries and funders of transport.

The COVID-19 recovery provides the opportunity to more comprehensively integrate transport with land uses and infrastructure from across the central government, local government, and private spheres. This includes horizontal infrastructure (water, energy, telecommunications), social infrastructure (schools, hospitals, parks, libraries, prisons), all transport modes in the public and private sector (including ports and airports) and development. It would also include key stakeholders: most notably iwi as well as NGOs or other interest groups.

Under our preferred system, transport would ultimately become part of an integrated spatial planning effort with other major land uses.

It would be performed at a regional level, reflecting the economic and social geography of where most New Zealanders live, work, and play.

Spatial planning would be undertaken collaboratively with central and local authorities (including regional and territorial authorities) working closely with major infrastructure providers.

Regional spatial plans would be guided by a coherent national vision.

Spatial planning would be guided by national priorities and guidelines. Central government, through its whole-of-system lens, would set broad priorities that regions must follow. Regions would be allowed to achieve these priorities in whatever safe and legal way they see fit. Local authorities would feed into regional planning and implement measures that fit the local scale.

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<sup>3</sup> Available on our website at: <https://www.infrastructure.org.nz/resources/Documents/Reports/Report%20-%20A%20vision%20for%20local%20government,%20planning%20law%20and%20funding%20reform.pdf>



Spatial planning transport and major network infrastructure at a regional level would allow for economies of scale and efficient planning and coordination with other modes. It would ensure the efforts of a city are connected with the efforts of their neighbouring districts.

### Clear outcomes

The current transport system is focused on overly prescriptive outputs to the detriment of broader outcomes.

For example, the GPS and NZTA regularly set performance targets around travel times, amount of mode shift, audience reach of safety campaigns, etc.

While these targets are part of broader overall goals, the net effect is that transport planning is done to achieve some very fine-grain targets. An observable tendency has been to focus on a target-achieving sub-system rather than to create a well-functioning system.

The planning regime should instead work towards clear, overarching outcomes. These outcomes would allow investment to occur in major revolutionary steps where necessary and allow regions and local authorities to find their own optimal way to progress.

A national plan would, for example, assist regions to deliver affordable housing, safe and efficient transport links, and resilience to natural disasters.

In the Wellington Region, safe and efficient transport links could be implemented through an increase in public transport services, whereas the West Coast may instead expand roading.

National direction would guide regional and local policies and investments. For example, Government objectives to reduce carbon emissions could be provided via funding allocations to regions to create a national electric vehicle charging network.

Spatial planning around clear outcomes would streamline the guidance and legal burden that governments face when trying to plan land uses based on the long, complicated, and sometimes conflicting Local Government Act, Land Transport Management Act, Resource Management Act, and any National Policy Statements or National Environmental Standards they may be supported by.

To meet these overarching targets, and to find the resources to undertake spatial planning, regions would have to be supported by meaningful funding.

### Sustainable funding

One of the major failings of the current transport system is the poor financial incentives for those who use and manage transport infrastructure.

Transport users do not pay their fair share for the impact they have on the transport sector. On a congested motorway, each added driver has a disproportionate impact on congestion, but the only material cost they face is the impact on their own time. Wealthier drivers who can afford more efficient



vehicles pay less petrol tax despite causing the same costs on the system. Drivers, through the NLTP, are funding other non-road modes including rail and coastal shipping.

Local authorities, who own and maintain local roads, receive none of the revenue benefits from the increased productivity and wealth that their transport improvements pay for, with most of the added GST, income, or corporate tax flowing to central government. Land value improvement is captured by landowners.

Nor do local authorities feel the downside costs if their inaction slows the economy, worsens inequity, or endangers lives.

A regional spatial planning regime would be a partnership. Central government's guidance, through the national vision, would outline the major outcomes that are expected of each region. Regions would then be given grants from the consolidated fund to develop and implement a regional plan. Regions that perform well would be eligible to receive a take of the economic taxes (GST, income, corporate tax) that are collected in their region.

The fully hypothecated NLTF, which currently is largely funded by road users, would be replaced by a pricing-based system designed to maximise the throughput of road corridors by optimising the relationship between speed and flow.

We would like to see much greater acceleration through the GPS to advance road pricing as a mechanism to improve mobility and access by better connecting the costs and benefits of transport decisions.

Such a road pricing will successfully link beneficiaries of road investment with funders, but additional measures will be required to tie other transport beneficiaries to resourcing for public and active transport.

Landowners are one principal beneficiary and the GPS should provide clearer guidance on how landowners who benefit from transport investment or planning changes resulting from transport investment will contribute to transport funding.

The Government is the other principal beneficiary from transport investment, via its increase in taxation revenue through new economic activity and productivity. We would like to see current Government commitments in response to COVID-19 flow through into longer term commitments of funding to invest in productive, sustainable and inclusive transport solutions, reflecting the benefit the Government receives.

The Government may choose to contribute to the transport system, now and into the future, directly through allocations from the consolidated account, or by attracting private capital. The GPS should be signalling opportunities for private investment, potentially linked to toll revenue, land value improvement or simply a long-term Government revenue stream.



**Infrastructure**  
New Zealand

## Summary

COVID-19 has greatly increased uncertainty of long-term transport planning. The future of transport revenue and demand is unclear.

The Draft GPS fails to account for this uncertainty and risks competing with, rather than enabling, a speedy and effective recovery.

To provide the necessary certainty of funding and planning for long-term planning processes, we propose that the Government either extend the previous GPS planning regime for a one- or two-year interim basis, or institute a temporary GPS that is flexible to suit the unknown future scenarios we may face.

The Government can use this opportunity to radically rethink transport planning and investment and reorient the system around an integrated spatial planning regime that is focused on clear outcomes based on sustainable funding.

This system would see transport as the enabler of productivity, land use and lower carbon emissions and would depoliticise decisions via collaboration, evidence and shared objectives.

We thank the Ministry for the opportunity to comment.

Yours sincerely,

Paul Blair  
CEO, Infrastructure New Zealand

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# SUBMISSION ON THE GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT: 2021/22-2030/31

8 May 2020

## Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing Construction Material companies which produce an estimated 40 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates, and assist in developing a highly skilled workforce within a safe and sustainable work environment.

## Background

Accessing, extracting, processing and transporting aggregate (crushed rock, gravel and sand) is needed for the construction of infrastructure in New Zealand.

Central and local government will need to invest an unprecedented amount of money into infrastructure, such as schools, hospitals, roads and transport, to meet anticipated population growth. The New Zealand Government relies heavily on locally sourced aggregate resources for infrastructure repair following disasters, for road and rail transport corridors, major projects and for housing development, all of which are essential for the social, economic and cultural well-being of our communities.

Currently, the cost of a tonne of aggregate doubles when it has to travel 30 kilometres from a quarry, with additional costs for each extra kilometre thereafter. By ensuring quarries are close to their markets sees transport costs, transport congestion and carbon emissions, significantly reduced.

We make the following submission in relation to the Draft for engagement – Government Policy Statement (GPS) on Land Transport: 2021/22–2030/31

## The strategic priorities for GPS 2021

We are generally in support of the four strategic priorities for GPS 2021.

It is critical however that the definition of “primary production” is consistent with the National Planning Standards introduced by this Government and gazetted in April 2019.

The Government's 2019 National Planning Standards define primary production as:

<p><b>Primary Production</b></p>	<p>Means:</p> <ul style="list-style-type: none"> <li>a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and</li> <li>b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);</li> <li>c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but</li> <li>d) excludes further processing of those commodities into a different product.</li> </ul>
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MfE made the decision to include mining and quarrying in the above definition due to the fact that most mineral extraction occurs in rural areas and that the RMA definition of "productive land" is used for a limited purpose and does not define all primary production activities (*Ministry for the Environment, 2019, 21 Definitions Standard – Recommendations on Submissions Report for the first set of National Planning Standards*).

In order to retain consistent definitions across planning and policy documents, and avoid confusion and potential conflict, the 2019 National Planning Standards definition of primary production should be used in the proposed Government Policy Statement on Land Transport.

### Strategic Priority: Safety

We generally agree that land transport safety needs to be a strategic priority.

Higher investment in road design and construction is required to increase infrastructure life, and lower repair requirements. Though the number of accidents related to poor road surface conditions (potholes, bleed areas, uneven surfaces, wheel rutting etc) is not specifically highlighted, these road surface conditions do contribute to accidents.

The current NZTA model of constructing cheap roads (low capital cost) and relying on ongoing repair and maintenance means roads are continually under repair or damaged through failure of the pavement. This adds to safety issues due to rutting, potholes, road edge failure (subsidence, erosion) etc. Continual road maintenance has seen a number of tragic incidents involving road workers who are being placed onto the highway network more often to repair and maintain poorly constructed roads.

Of particular concern is the state of rural roads. We believe there needs to be an across the board, increase to the Financial Assistance Rate (FAR) thereby increasing the Government's funding proportion of both the maintenance of, and capital expenditure on, local roads. Significant investment has been made to state highways

and major arterial routes, but many local roads are in a poor state, unsafe and vulnerable to adverse events.

Where a road is a key part of the freight network, ensuring good road infrastructure and maintaining appropriate higher speeds is important. Such infrastructure must include suitable corridor widths and turning bays which allow safe travel for long vehicles. We need to build intersections and entry/exits to sites to cater for slower commercial vehicles to enter/exit the road network safely and blend in with local traffic.

We support encouragement of fleet modernisation through either penalties or positive enforcement. We support lower ACC costs for vehicle operators with GPS, fatigue management or similar technologies installed. We would also support lower Road User Charges (RUC) for more modern vehicles (ANCAP and/or UCSR rated), and conversely higher RUC for older vehicles.

We believe mandatory safety features on all vehicles including a mandatory ANCAP or UCSR rating, are critical to improving the safety performance of all road vehicles. There may need to be a transition for older vehicles, but it is important that improving the safety of vehicles is not delayed further.

### Strategic Priority: Improving Freight Connections

We agree that improving transport connections, alternative routes and investments in multiple travel modes, will boost the ability of the transport system and communities to recover from disruptive events supporting continuity in economic activity and regional development. This will be particularly important as the economy recovers from the COVID-19 pandemic. Job-rich projects like core infrastructure, housing, and environmental restoration are crucial to the Government's plan to stimulate the economy.

As stated in the recent NPS-Urban Development discussion document "transport systems are poorly integrated with land use, and lack high-quality options to improve access to jobs, and reduce car dependency".

We support review of options for moving aggregate around the country on rail or coastal shipping, particularly where distances from quarry to market increase. Previous attempts by our sector to access such options have been both prohibitively expensive and/or difficult logistically to organise within demand timeframes. That said we would be happy to work with Government and transport delivery providers to pursue options for such methods of transporting aggregates around the country.

## Strategic Priority: Climate Change

Climate change and rising sea levels are going to put added pressure on rock supply for sea walls, riverbank protection and restoration.

Demand is almost totally domestic and currently the only alternative to local extraction and supply of aggregates is to import aggregates to meet demand.

It is likely that such imports would come from countries who are not operating in sustainable ways nor aiming to achieve carbon neutral targets similar to the ambitions of New Zealand. Importing of aggregates would also put added pressure on our ports, infrastructure and increase carbon emissions through delivering aggregates greater distances.

Technically and economically viable opportunities to reduce energy-related emissions and adopt clean energy technologies exist now. However, the aggregates sector currently face a number of barriers that hinder the uptake of clean energy technologies and other cost-effective measures to reduce emissions such as:

- Road networks are not designed to take the additional weight of electric heavy vehicles. Even if state highways are upgraded, the road networks connecting quarries with their markets include a large number of rural roads.
- Unnecessary regulatory and cost barriers inhibit our ability to unlock least-cost abatement opportunities and encourage rapid uptake of low-emissions technologies. An example here is Resource Management processes that are complex, litigious and costly and are frequently disproportionate to the decision being sought, or the risk or impact of the proposal.
- There is little incentive for recycling and re-use due to the cost of processing these products relative to natural products and the reluctance of customers to specify and/or allow the use of recycled products. These customers include central and local government who are both significant users of aggregates and sand.

## Principles for investing

### **Making the most of our existing land transport network**

We agree that existing networks and services could be used more efficiently, however if we continue to embrace technology including heavier electric vehicles and modern heavy vehicle configurations, we need to continually upgrade the road network to compliment this technology.

More efficient use of networks in relation to supply of aggregates and sand could mean more flexible operating hours in areas to reduce traffic congestion at peak times and spread the load on roads. An example here is the restocking of resale

yards, concrete and asphalt plants in urban areas at night so that trucks are off major arterial roads during the morning peak times. While this may involve 24-hour operations for loading, this can be done while mitigating the operation's impacts on the environment and ensuring community wellbeing is maintained.

Wayne Scott

Chief Executive Officer

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# Transportation Group NZ



## ***SUBMISSION – DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2021***

7 May 2020

### **INTRODUCTION**

This submission is made on behalf of Engineering New Zealand Transportation Group NZ (TG). The National Committee members have compiled this submission with engagement from TG members.

### **TRANSPORTATION GROUP NZ**

Transportation Group NZ is a Technical Interest Group of Engineering New Zealand, with approximately 1,200 members. Membership is made up largely of transportation engineering and planning professionals working in central government, local government, academia and the private sector.

### **OUR SUBMISSION**

We **agree** with the stated strategic priorities for investment in land transport.

The Transportation Group **supports** GPS funding of maintenance and renewal of the rail freight network, including rail connectivity across Cook Strait.

The highest level of agreement amongst Transportation Group members for an **increase in funding** are for the Activity Classes 'Public transport services' and 'Public transport infrastructure', both with more than two thirds support from Members.

There was **no** Activity Class where a majority of Members supported a decrease in funding.

The Transportation Group **supports** an increase fuel excise duty by one cent per litre to provide more funding for healthy and sustainable mobility.

Regardless of how road safety activities are funded, the Transportation Group urges that **all investment** in road safety should all be based on strong and consistent evidence about the potential for harm reduction.

We **support** raising revenue from fuel excise duty and equivalent road user charges so that those driving motor vehicles pay more of the true cost of travel, and so that the increases in funding allocations we identified (for public transport, walking and cycling) can be funded.

We believe that investment direction for road safety is strong in a rural road context. Regarding investment in urban road safety, evidence concerning reduction in fatal and serious crashes should be considered **alongside supporting mode shift** towards walking, cycling,

and public transport; and (therefore) supporting health and climate change objectives. The funding allocation process and rules need to be improved in urban settings to account for differences in exposure and therefore risk for people walking, cycling, and using other modes. This includes an urgent need to consider public health as part of urban harm reduction measures.

The area of highest group support for **decreased funding** was investment in new roads, with approximately one third of members supporting a decrease in investment, and half supporting maintaining the current investment level.

We **support** raising revenue from fuel excise duty and equivalent road user charges so that those driving motor vehicles pay more of the true cost of vehicle travel, and so that the increases in funding allocations we identified (for public transport, walking and cycling) can be funded.

Thank you for the opportunity to submit on the GPS. For more information on this submission please contact:

Bridget Burdett CPEng, PhD, MET, BE Civil

Deputy Chair of the Engineering New Zealand Transportation Group

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## **Submission from the New Zealand Port Company CEO Group on the Draft Government policy Statement on Land Transport (GPS) 2021 and Draft New Zealand Rail Plan**

The New Zealand Port Company CEO Group (the Group) comprises the CEOs from Northport, Ports of Auckland, Port of Tauranga, Eastland Port, Napier Port, Port Taranaki, Centreport, Port Marlborough, Port Nelson, Lyttelton Port Company, Prime Port Timaru, Port Otago, and Southport. This submission is made on their behalf.

The Group is generally supportive of the draft GPS. In particular the Group welcomes the fact that “improving Freight Connections” is seen as one of the four strategic priorities in the strategy. The Group has been concerned that in recent years the importance of freight seemed to have been overlooked by transport planners. This was evidenced by the serious reduction in freight planning and modelling capability at the New Zealand Transport Agency and by the delays in implementing an essential project in the freight network – the third (and hopefully fourth) rail line into Auckland. If adopted, this strategy will put freight considerations back to where they should be sitting as a strategic priority.

Clearly in terms of priority we encourage a focus on those projects that deliver the highest benefit/cost ratios. We are concerned that some public transport proposals around the country appear to be driven without any regard to such ratios.

Kiwirail is a vital part of the freight network that helps ease congestion on the roading network and which delivers important climate change policy benefits for New Zealand. We welcome the integration that is foreshadowed between road and rail planning by giving responsibility to NZTA to advise the Minister on how Kiwirail’s proposed Rail Network improvement Plan fit with the broader land transport investment programme. Requiring Kiwirail to develop and deliver a 3 year investment programme for the rail network and a 10 year forecast is long overdue. The year by year planning for Kiwirail in recent years has led to some of the problems obvious in the network.

We welcome the focus on freight in the Rail Plan also. We suggest before this plan is finalized that the Ministry ensure coherence between this Plan and the GPS, maybe using the same framework and structure as the GPS.

We are also pleased to see the addition of Coastal Shipping to this GPS. Coastal shipping already performs a critical role in the freight system and has the potential to become even more important. The Group has long advocated mode neutrality and policies that allow the coastal shipping sector to operate on a level playing field with other freight operators including international shipping operators. These international shipping operators play a crucial role also for domestic freight. The Group would oppose any policies that might be introduced to change the current cabotage policy. The importance of the role played by the international operators was highlighted in the response to the Kaikoura earthquake and more recently the response to the Level 4 shutdown in response to covid-19. We note that funding allocated to coastal shipping in the GPS is limited to that necessary for research. The policy options seem pretty obvious if mode neutrality and a level playing field are the desired outcomes – equality of treatment on taxation, enforcement of labour, health and



safety laws and equality of treatment in any subsidy policy that might be applied to other transport modes – eg rail.

Thank you for the opportunity to comment on this draft. The Group looks forward to the strategy being finalized and to working with Ministers and officials to see the strategy implemented. We note that this document was drafted before the Covid-19 crisis and economic downturn hit. We would support a redraft to take account of this new challenge and to front load some of the planned investments deliver more quickly essential freight transport outcomes at the same times as providing a stimulus to employment and economic activity.

We note that a number of individual ports will be making their own submissions on this GPS

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11 May 2020

Ministry of Transport  
PO Box 3175  
Wellington 6140

VIA EMAIL: [gps@transport.govt.nz](mailto:gps@transport.govt.nz)

## **NAPIER PORT SUBMISSION ON THE DRAFT GOVERNMENT POLICY STATEMENT – LAND TRANSPORT 2021/22 TO 2030/31**

As a key stakeholder, Port of Napier Limited (Napier Port) is in receipt of the draft Government Policy Statement – Land Transport 2021/22 to 2030/31, (draft GPS 2021)

We appreciate the opportunity to provide a written submission on the draft GPS 2021, which is **attached** for your consideration.

Yours sincerely

**Michel de Vos**

General Manager Infrastructure Services  
s 9(2)(a)

**W** [napierport.co.nz](http://napierport.co.nz)

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SECTION OR PARAGRAPH NUMBER	OPPOSE / SUPPORT	POSITION STATEMENT
<p><b>Para 33 and 34</b></p> <p>33. Waka Kotahi works with local government and other agencies to develop integrated plans for transport and land use. It supports local government to create quality RLTPs, which it draws from to create the NLTP that gives effect to the GPS' priorities. In doing this, it optimises investment across priorities and available funding and financing sources. From 2021, Waka Kotahi will also have new partners to work with. Bringing rail into the NLTP represents a significant change for the system.</p> <p>34. Waka Kotahi will be responsible for advising the Minister of Transport on how KiwiRail's proposed Rail Network Investment Programme (RNIP), and the activities under it, fit with its broader land transport investment programme under the NLTP. This involves confirming that the rail network activities are aligned with the LTMA's purpose and the GPS, and advising the Minister that the activities represent good value for money. Waka Kotahi will also have a role in monitoring the delivery of the RNIP.</p>	<p>Support</p>	<p>Napier Port is a key stakeholder and significant regional infrastructure in Hawke's Bay. It maintains a good relationship with Central government representatives from Waka Kotahi and Kiwi Rail, along with local government agencies including Hawke's Bay Regional Council, Napier City Council and Hastings District Council.</p> <p>Napier Port are supportive of the integrative nature of rail into the National Land Transport Plan (NLTP). This provides for key partners to be collaborative in road and rail planning. Both these modes of transport are vital to the Port in providing efficient and effective freight movement to and from the Port.</p>

<p><b>Para 42 and Figure 1</b></p>	<p>Support</p>	<p>The draft GPS strategic priorities are consistent with the Port’s strategic purpose of: <i>Together, we build a thriving region by connecting our customers, people and community to the worlds.</i></p> <p>The Port supports the strategic intent.</p> <p>The Port agrees that the overlap of the four strategic priorities – Safety, Better travel options improving freight connections and climate change, will for many investment and built solutions see multiple beneficial outcomes being achieved. An example of this is provided in paragraph 47 of the draft GPS.</p>
<p><b>Para 45</b></p> <p><b>3. Improving Freight Connections</b></p> <p>45. Efficient, reliable, safe, mode-neutral and resilient freight transport – within cities, between regions and to ports – is vital for a thriving economy. Regional New Zealand’s primary production is a key driver of the national economy. The transport system needs to support the movement of freight by the most appropriate mode, improving interregional corridors, and increasing resilience.</p>	<p>Support</p>	<p>Napier Port’s strategic purpose is: <i>‘Together, build a thriving region by connecting our customers, people and community to the world.’</i></p> <p>Napier Port supports this draft GPS context around improving freight connections. The Port is vital to the local economy, as it relies upon sustainable freight connections to undertake one of its core functions. As a key driver in the regional economy, in the 2018 financial year Napier Port supported the \$8.1B Hawke’s Bay economy, and with that directly and indirectly 27,000 full and part-time jobs in the region. Nearly 80 percent of exports are primary products produced regionally from the fertile soils of the Heretaunga Plains.</p>

		<p>Freight connections on road and rail form the transport ‘backbone’ for the movement of products and people to and from the Port. A resilient transportation network is a critical infrastructure.</p>
<p><b>Para 65</b></p> <p><b>Primary outcome</b></p> <p>65. Well-designed transport corridors with efficient, reliable and resilient connections will support productive economic activity.</p>	<p>Support</p>	<p>Napier Port is strongly in favour of the Primary outcome that seeks to support productive economic activity. Well-designed transport corridors with connections that are efficient, reliable and resilient signal to all businesses and industry that the critical transport corridors, both road and rail, are key infrastructure assets for the safe movement of goods and people.</p> <p>Economic activity creates a thriving business and economy plus it has the added advantage of supporting employment and the movement of goods and products within and beyond the region.</p>
<p><b>Section 2.4</b></p> <p><b>Key outcomes of Improving Freight Connections</b></p> <p><b>Primary outcome</b></p> <p><b>Economic prosperity</b></p> <p><b>Co-benefits</b></p> <ul style="list-style-type: none"> <li>▶ <b>Inclusive access</b></li> <li>▶ <b>Healthy and safe people</b></li> <li>▶ <b>Resilience and security</b></li> </ul>	<p>Support</p>	<p>The co-benefit ‘Inclusive access’ is incorrectly listed here, it should read ‘Environmental sustainability’.</p> <p>The Port is an essential contributor to the wellbeing of the Napier and the local economy through the export of local goods such as pipfruit and other primary produced goods, along with logs and import of a wide range of goods and products. This aligns with the ‘economic prosperity’ outcome being sought.</p> <p>Napier Port supports the listed co-benefits of ‘Environmental sustainability’, ‘Healthy and safe people’ and ‘Resilience and security’. The Port has a sustainability framework that is being embedded into the day to day decision-making and operations.</p> <p>The Port is an essential lifeline provider and facility within the region and is therefore a critical infrastructure asset. The criticality of this infrastructure is reflected in the need to ensure it can function effectively and efficiently and be resilient to disruptive events and natural disasters.</p>

<p>Para 86</p> <p>86. The Government will continue to work with other participants in the land transport planning and funding system (e.g. local government and other agencies) to enable better results within available funding limits. It will also continue to investigate new options for how transport sector projects can be funded and financed. In part, this will be achieved through the funding and financing toolkit, which will assist decision-makers to choose appropriate and effective methods to pay for new infrastructure. Once established, this toolkit will provide users with access to information, guidance and best practice. This toolkit will grow and improve over time.</p>	<p>Support</p>	<p>The Port agrees that a collaborative approach on funding creates the ‘right-mix’ to ensure relevant agencies are included in the funding discussions that impact on their business.</p>
<p>Para 88</p> <p>Section 3.2</p> <p><b>Principles for investing</b></p> <p>Transport investment decisions need to be transparent and provide the best possible impact and value to New Zealanders.</p>	<p>Support</p>	<p>The principles for investing under the National Land Transport Fund (NLTF) are underpinned by: Effectiveness, (2) Alignment, and (3) Efficiency. The Port agrees that these are sound and robust principles to adopt and apply by the decision-makers (i.e. Waka Kotahi and local government) on whether to fund land transport projects.</p>

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<p><b>Activity Class Framework</b></p> <p><b>Coastal shipping</b></p> <p>128. New Zealand’s coastal shipping sector fulfils a critical role in New Zealand’s freight system. It provides a safe and sustainable mode for transporting large, heavy cargo such as petroleum products, cement and aggregate. There is potential to increase the use of coastal shipping as an alternative to other freight transport.</p> <p>129. Ultimately, the Government’s expectation for investment in coastal shipping is to embed mode neutrality and choice for freight transporters, to allow New Zealand flagged coastal shipping to operate on a level playing field with other freight operators, and to enhance the sustainability and competitiveness of the domestic sector. It also reflects the Government’s interest in partnering with industry to understand the challenges facing coastal shipping, and working with it to address these challenges. The initial three years of funding will include relevant research to see what future support for the sector may help achieve Government’s aims.</p>	<p>Support</p>	<p>Napier Port is supportive of the new activity class ‘coastal shipping’ that has been provided for. The initial proposed funding of \$10M to \$15M (low to high) from 2021/22 to 2023/24, provides an opportunity for the coastal shipping sector to undertake focused research to achieve the government goal of mode neutrality.</p>
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Formerly Blind Foundation

11 May 2020

## Draft Government Policy Statement on Land Transport 2021

To: Ministry of Transport  
PO Box 3175  
Wellington 6140

Electronic submission via email to [gps@transport.govt.nz](mailto:gps@transport.govt.nz)

1. Blind Low Vision NZ (formally known as the Blind Foundation) welcomes the opportunity to make this submission on Draft Government Policy Statement on Land Transport 2021.
2. Blind Low Vision NZ is the operating name of the Royal New Zealand Foundation of the Blind, an incorporated charitable society under the Incorporated Societies Act 1908.
3. Blind Low Vision NZ's purpose is to enable approximately 14,000 clients and members who are blind, deafblind or have low vision to be self-reliant and live the life they choose.
4. Our vision is a life without limits. As the leading provider of practical and emotional support to people with vision loss we work with clients to find the tools and technology for them to be as independent as possible, enabling them to enjoy life and participate fully in society.
5. Our services include providing vision loss rehabilitation, equipment and training to continue reading and communicating, and services that facilitate mobility, socialisation, recreation, education and employment.
6. This submission relates to Draft Government Policy Statement on Land Transport 2021.

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**Blind Low Vision NZ**

**Phone** 0800 24 33 33 **Web** [blindlowvision.org.nz](http://blindlowvision.org.nz)



## General Comments

7. A lack of accessible transport options is one of the important issues Blind Low Vision NZ clients face every day. For our client's, accessible footpaths and being able to travel safely and confidently on these is essential to being able to access the environment, services and facilities, transport connections, social connections and undertake daily activities.
8. We actively work with central and local government to promote the safety of pedestrians who are blind, deafblind or have low vision, and we are also a member of the Living Streets Aotearoa coalition promoting safe and accessible footpaths.
9. The Draft Government Policy Statement on Land Transport 2021 impacts significantly on people who are blind, deafblind or have low vision
10. Blind Low Vision NZ would like to take the opportunity to advocate for more accessible public transport services and safer footpaths for people who are blind, deafblind or have low vision.
11. For those who are blind, deafblind or have low vision walking is important to enabling them to participate in the community, accessing services and facilities, travel to study and employment and accessing Public Transportation. Investment in infrastructure must ensure safe and accessible footpaths. The design should not be placing those who have impairments at risk (real or perceived).
12. Blind Low Vision NZ supports the strategic priorities of the Draft Government Policy Statement on Land transport, specifically the focus on safety and better travel options
13. Blind Low Vision NZ believes that the Draft Government Policy Statement on Land Transport 2021 needs to be accessible for people who are blind, deafblind, have low vision or have other disabilities.
14. Blind Low Vision NZ would like to see more consideration of people who are blind, deafblind, have low vision or have other disabilities in the Draft Government Policy Statement on Land Transport 2021 and how the strategy aims to improve access to transport.
15. The Draft Government Policy Statement on Land Transport 2021 refers to 'accessibility' throughout the document. However, the context of these references suggests that accessibility means availability of services only. Accessibility means

that all public transport users, including those who are blind, deafblind or have low vision, can travel independently and safely. The Draft Government Policy Statement on Land Transport 2021 must consider accessibility beyond simply the availability of services.

16. Without a safe, accessible public transport, individuals who are blind, deafblind or have low vision have reduced independence, higher rates of unemployment, limited recreational opportunities, and increased social isolation.
17. There are many facets to public transport, and each may present accessibility barriers. People with vision loss are disproportionately more reliant on public transport than other New Zealanders. It is essential that they are able to plan journeys, access timetables, locate boarding positions, identify destinations and travel to and from these locations safely and independently. In other cases, audible stopping and destination signals and other passenger information systems are either not installed or not consistently used on buses, trains and at stations when they should be.
18. The definition and the use of the word 'Inclusive Access' seem tokenistic when the document clearly does not consider the experiences of people who are blind, deafblind, have low vision or other disabilities when accessing public transport.
19. We believe that the definition of 'Inclusive Access' needs to be more refined. The definition should include people who are blind, deafblind, have low vision or other disabilities.
20. Blind Low Vision NZ has questions regarding whether current infrastructure spending will affect the Draft Government Policy Statement on Land Transport 2021.
  - a. Does it include the \$12 billion in extra infrastructure investment announced by the Government end of last year?
  - b. What effects does this have on Draft Government Policy Statement?
  - c. Will any projects be brought forward?

13 May 2020

Ministry Of Transport

Via email: [gps@transport.govt.nz](mailto:gps@transport.govt.nz)

**Re: Draft Government Policy Statement on land transport 2021**

Rural Women New Zealand has pleasure in providing a submission on the Draft Government Policy Statement on land transport 2021.

- We are pleased that there is mention of changes needed to reduce speed close to rural schools. Our children and rural families will be much safer when this is in place.
- RWNZ would also like to see changes which enable a reduction in speed close to rural school buses at pick-up and drop off. In addition, flashing lights and signs on rural school buses should be mandatory.
- In reference to point 1.18 regarding police numbers, RWNZ would like to see increasing police numbers in rural New Zealand as opposed to maintaining numbers as mentioned in the document.
- RWNZ is disappointed that rural New Zealand only has one mention in the document. This indicates to us a lack of thought to the impacts or needs of rural New Zealand. We do see the mention of regional and remote New Zealand, however, rural New Zealand hosts the next highest population after Auckland and New Zealand's rural communities deserve better recognition.
- RWNZ notes the main messages around making roads safer and more inclusive of all users. The impact of this can't be seen more clearly than in rural New Zealand. We ask that a rural impact analysis be carried out on the strategy to ensure that rural New Zealand receives equal consideration in plans and funding to improve outcomes for rural road users.
- Women are the glue that holds rural communities together and never more so than in an adverse event, which includes land transport related serious injuries and deaths. To reduce this impact, RWNZ requests that a gender impact analysis is carried out on this strategy and alongside a rural impact analysis. The intersectionality of both is important when determining any adverse impact of this strategy on rural communities and will lead to better solutions.

## About RWNZ

- Rural Women New Zealand (RWNZ) is a not-for-profit, member-based organisation that reaches into all rural communities and has an authoritative voice on rural environment, health, education, technology, business and social issues.
- RWNZ strives to ensure that all rural residents, workers and families have equitable access to services, inequalities are addressed by Government, and the wellbeing of rural communities is considered from the beginning of all policy and legislative development.
- RWNZ is affiliated to the Associated Country Women of the World and as such upholds all United Nations, ILO, FAO and WHO conventions and outcome statements as they relate to women and rural women in particular.
- RWNZ would like to draw particular attention to the United Nations Sustainable Development Goal 11, which seeks to make human settlements inclusive, safe, resilient, and sustainable; Goal 3: Ensure healthy lives and promote well-being for all at all ages; Goal 9: Build resilient infrastructure, promote sustainable industrialization and foster innovation; Goal 10: Reduce inequality within and among countries and; Goal 5: Achieve gender equality and empower all women and girls.

Nāku noa, nā

s 9(2)(a)

Angela McLeod  
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Rural Women New Zealand | Ngā Wāhine Taiwhenua o Aotearoa  
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millions of  
**mothers**

## **Submission on the Draft Government Policy Statement on Land Transport 2021**

11 May 2020

Millions of Mothers is a group of largely parents and wider whānau, concerned with our families and particularly children's future in a rapidly warming world. Our parents come from a range of backgrounds and experience. We are ordinary parents standing up for climate action, to ensure all children have a livable planet to thrive on.

We are very concerned for those already vulnerable, marginalised and without a voice in our society. They are most at risk of the consequences of climate change and poorly thought out mitigation measures and it is the role of our society, led by the government to ensure that no one is left behind. Our lack of urgency and action today will be felt by our children tomorrow. Many people, particularly women and children are hurting today around the world, from the consequences of the warming.

The next 10 years are crucial for mitigating climate change and limiting its adverse effects. Transport emissions are key in climate change mitigation AND human health. Transport emissions have been driving NZs emission upward in recent times. At the same time, reducing and ultimately eliminating emissions from transport is one of the more straightforward (low hanging fruit), when compared to other emission sources. Reducing emissions have a multitude of co benefits, it's a no brainer.

The timeline of this Government Policy Statement on land transport (GPS) overlaps this crucial time and its outcomes will have implications that will affect our 2050 zero carbon goal as well. It is vital that this GPS is ambitious and looks at both the short and long term, allows for innovation and be flexible.

We make the following recommendations and comments

### **Covid-19**

We acknowledge that we are in the middle of a global pandemic which will no doubt have impacts on not only our economic well-being but on upcoming policies. In turn we believe this will allow more innovation and ability for the government to invest not only in our people's needs now, but future ones. New Zealanders have embraced active modes during lockdown and must continue to be heard, consulted and brought along in these decisions. In particular, tangata whenua, disabled and vulnerable communities. People want and need choice and appropriate infrastructure must be prioritised to provide this.

## Purpose and outcome framework of the GPS

We support the purpose of “A transport system that improves wellbeing, and livability” and the outcomes framework of the Government Policy Statement on land transport (GPS). We do not, however, see these reflected in the rest of the GPS as we think they should. Currently, we would argue that very few of the outcomes are being met and that our current system is worsening wellbeing and livability. It is important to **put the purpose at the heart of this GPS**, not just as a nice goal at the start.

## Strategic Priorities

We support the strategic priorities, but think they lack ambition. This is a problem because public and active transport is starting from a low base. So using terms such as more or increased (e.g. “*Public transport and active modes are more available and/or accessible*” and “*Increased share of travel by public transport and active modes*” page 19) is not going to be enough to get the large changes we need. Public and active transport should become the key options, not just more available and/or accessible. Emissions, air pollution and noise will not reduce significantly if we do not get significant modal shifts. Councils need to be empowered to put targets on modal shifts. As the strategic priorities are currently written we expect a continuation of slow modal shifts.

We suggest throughout the GPS the **language is strengthened** and the **priorities are more ambitious with targets** for increases in active and public transport modes, reductions in emissions etc.

## Value for Money

Value for money is also a key consideration for our future generations and fundamental to look at long term costs as well as value for money now. Especially when looking at infrastructure that will lock in emissions which will be very costly long term for public health, wellbeing and economy. We would expect to see very clearly laid out how these costs and benefits relate to future costs related to climate change. The whole of life cost is crucial to limiting further stranded assets and cost to our future generations. This **needs clear direction and examples** of what weighing up the future costs or benefits could be and needs to be clear for decision makers at all levels of governance

## Urban design and land use

We support a holistic approach with planning the transport system and the inclusion of urban design and land use. Where people live, work, produce food and do recreation is key in our transport decisions. We strongly agree with this statement : “*Shape land use, urban form and street design in a way that reduces car dependency, makes walking, wheeling, cycling and micro-mobility safe and attractive travel choices, and reduces emissions from transport.*” from page 17. We see this is key to delivering on the outcomes and purpose. To do this we must limit new housing and commercial buildings outside of current urban limits and limit building new and larger roads that enable and connect these developments. We acknowledge the challenges with affordability, though also note that housing is not getting more affordable by urban sprawl. It is key that these sectors **work closely together at all levels of governance with a common purpose of increased well-being and livability**.

## Decisions

All decisions and planning at the local through to central government level must be put through the outcome framework lenses, particularly those with a climate lens of mitigation and adaptation and the Zero Carbon Act. **This must be mandatory** with targets.

## Local Government

31. An RLTP must contribute to the purpose of the LTMA 2003, which seeks an effective, efficient and safe land transport system in the public interest. It is also required to be consistent with the GPS. (p 10).

- Must be doable for councils, with limited funds.
- Government should provide more resources to councils.
- There are numerous legislative blocks that limit council's ability to innovate, e.g. minimum road widths.

It is very important that this strategic GPS is followed by action by the government and Waka Kotahi. We and many councils are still waiting for a ride share app from Waka Kotahi. If you say you are going to do something and don't deliver, that can stifle innovation.

## Making the most of our existing land transport network

We see this as a crucial element and must be the first consideration when considering investigating new roads or improvements. There are many opportunities to use our current networks better and to meet the four strategic priorities.

- Reallocating some existing road space to active transport infrastructure, like the temporary pop ups for increasing physical distancing for covid-19.
- Allowing local governments to directly influence travel behaviour, such as road user charging or congestion charging and use that money for improving low emission and accessible travel options.
- Incentivising car-share schemes and ride sharing that reduce cars on the road and increasing passenger numbers.
- Lowering speed limits on all urban roads and closing through roads.
- When a new road or more lanes are proposed, alternatives, like increasing active transport infrastructure and public transport be **MUST** explored first.

## Funding

The proposed funding ranges is where this GPS, despite its purpose, framework outcomes and strategic priorities shows that it is largely more of the same with some tweaks. We find the funding allocations very disappointing, particularly the largest amounts going to state highway improvements in the short term. This is the time to be bold and set a new path. **We do not believe you can get the modal shifts, safety outcomes and reduced emissions with the allocation as proposed.**

Active and public transport has been underfunded and this should now be rectified by making their funding the first priority, not just an increase in share.

## What we want

We must not build more roads; we have an extensive network already. More roads and lanes will lead to more vehicles and more emissions. It must stop now. Our current system is not equitable and safe. To build new roads they must pass a tough test, of all the framework outcomes and the purpose. Any new roads must meet a very narrow criteria of building resilience (e.g. earthquakes) and adapting to climate change, such as sea level rise. We may struggle to afford to maintain our current network in the future with the increasing number and severity of extreme weather events (e.g. high rainfall events and flooding in Tasman District in recent years, with repairs ongoing)

We see reducing the number of cars on the road, at the same time as increasing active and public transport as the main way to achieve the strategic priorities, framework outcomes and purpose. When we have less cars, there is no need to build more roads, there is less pollution and emissions, safer streets and roads, less network maintenance and more efficient freight.

For urban areas, we must concentrate on getting people out of cars for most short distance trips. Do that by removing as many barriers as possible and make it more attractive easier and quicker than getting in the car. In saying this, it must be ensured disabled, elderly and vulnerable people are continually consulted with to ensure their needs are met every step of the way.

We must rebalance the resources spent on roads for largely personal cars, primarily in urban and adjacent land with proper infrastructure for all active modes. Transport in NZ is expensive, particularly personal cars and is a massive drain on our family's resources. Many do not currently have a better choice. Space taken up by different modes of transport and their infrastructure is important, especially in urban areas, where land is in short supply. Previous investment in active modes is undermined because for example critical gaps that remain in urban cycling networks. Injuries and fatalities occur to cyclists in crashes on state highways and rural roads and safety is a major barrier to modal shift. The percentage of the population that would like to bike or walk for recreation and transport on urban streets and rural roads is much greater than the percentage that actually does walk and bike. This is very clear from the very visible increase in the number of people (including young children) who biked and walked during the Covid-19 lockdown. Large investment in active modes of infrastructure is very important to our families.

We acknowledge the inertia in the current road and car-based system we have and there are so many examples of options that will meet the GPS purpose. It must be led by the local government, fully backed and supported by the central government. There are significant opportunities to innovate with low cost infrastructure to enable active modal shift, which gives time to test what works and doesn't in different places. Some of this is happening now as a response to the need for physical distancing. Bigger long-term infrastructure projects can then be planned to follow.

## Summary

We support investment being closely aligned to desired outcomes and would like to see funding tied to use of best practice standards, particularly for active mode infrastructure.



We must not further **entrench the dominance of motor vehicles in the land transport system, and exacerbate the marginalisation of walking, cycling and other active modes.**

We are very concerned the investment proposals in the draft GPS appear to place considerable weight on New Zealand's economic growth and, as such, will lead to underemphasis on social, cultural and environmental well-being. Proposed investments are oriented towards efficiency of road transport for people and freight but do not ensure equitable access for people who cannot or choose not to drive in private vehicles. The funding levels for the activity classes in the draft GPS will further entrench our reliance on road transport and the marginalisation of active transport. Without a more comprehensive shift away from a motor vehicle-centric land transport system, New Zealand's longer-term environmental goals (in particular, its commitments under the Paris Agreement to reduce greenhouse gas emissions) will fail.

The level of funding proposed for walking and cycling in the draft GPS does not adequately support the overarching purpose of improved social, cultural and environmental well-being, and improved livability of places. Throughout the GPS there needs to be a far more integrated approach to achieving well-being. Without a much greater level of funding the GPS will not ensure that transport investment goes in the overall strategic direction sought, much less result in the necessary step change. The GPS published in 2021 needs to be a document not just for 2021 and the following two years, but a foundation for a genuinely integrated approach to well-being for the 21<sup>st</sup> century.

The co-benefits of active transport for health need to be explicitly recognised as this provides further justification for increased levels of funding in the walking and cycling improvements activity class. Physical inactivity contributes to a rapidly growing taxpayer burden of non-communicable diseases such as diabetes, cardio-vascular disease and some cancers. Encouragement of active travel including cycling, walking and public transport is known to increase public health outcomes and reduce healthcare expenditure.

Building on the key point made above, that an integrated approach is needed to well-being, which is a recurring theme in our submission, Millions of Mothers recommends that the Climate Change Commission and the Ministry for the Environment should be added to the list of agencies in para. 2, especially given the greater emphasis given to climate change in the transition from the GPS 2018 to the GPS 2021. Our current 2030 emission reduction goal is inadequate (and under review) and is not consistent with the purpose of the Zero Carbon Act of keeping global temperatures to 1.5C. It is highly likely that our 2030 reduction target will change, this GPS needs to be prepared for this and furthermore, a more ambitious emission reduction, would very likely help meet the other strategic goals.

Millions of Mothers  
Alicia Hall and Olivia Hyatt

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# **ROAD TRANSPORT FORUM NEW ZEALAND INC**

## **SUBMISSION TO MINISTRY OF TRANSPORT ON THE GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2021/22-2030/31 DRAFT FOR ENGAGEMENT**

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**MAY 2020**

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# **RTF SUBMISSION TO MINISTRY OF TRANSPORT ON THE GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2021/22-3/31 DRAFT FOR ENGAGEMENT**

## **1. Representation**

- 1.1 Road Transport Forum New Zealand (RTF) is made up of several regional trucking associations for which RTF provides unified national representation. RTF members include Road Transport Association NZ, National Road Carriers, and NZ Trucking Association. The affiliated representation of RTF is some 3,000 individual road transport companies which in turn operate 16-18,000 trucks involved in road freight transport, as well as companies that provide services allied to road freight transport.
- 1.2 The RTF is the peak body and authoritative voice of New Zealand's road freight transport industry which employs 32,868 people (2.0% of the workforce), and has a gross annual turnover in the order of \$6 billion.
- 1.3 According to MOT's research (National Freight Demands Study 2018) road freight transport accounts for 93% of the total tonnes of freight moved in New Zealand, about 75% of New Zealand's land-based freight measured on a tonne/kilometre basis.
- 1.4 RTF members are predominately involved in the operation of commercial freight transport services both urban and inter-regional. These services are entirely based on the deployment of trucks both as single units for urban delivery and as multi-unit combinations that may have one or more trailers supporting rural or inter regional transport.

## **2. Introductory comments**

- 2.1 The 2021 Government Policy Statement (GPS) is something of a disappointment for the road freight sector. This is despite Transport Minister Phil Twyford's press statement of 19 March 2020 suggesting record investment of \$48 billion, on top of \$6.8 billion New Zealand Upgrade programme. Nothing in the Minister's briefing notes (attached to the press release) gives road users confidence the historical hypothecation of the road-related revenues will not be drawn in to the transportation expenditure abyss to support all the coalition Government's preferred objectives such as walking, adding to the cycling infrastructure, rail, coastal shipping and public transport. The revised GPS 2021 embodies a specific wellbeing focus. The difficulty is determining who truly benefits from the wellbeing objective when the policy actually undermines strategic modal efficiency and displaces it with some sort of theoretical indulgence. In a nut shell, the 2021 GPS offers no economic clarity.
- 2.2 There is no doubt government is proposing to put forward a lot of money for infrastructure development. But given the depth of the Covid-19 impact on the New Zealand economy, we question the approach in the GPS and whether the expenditure proposals remain valid. Recently (28 April 2020)

Ministers Twyford and Peters announced 1000 workers "back to work" on road and rail projects.

- 2.3 This is against a backdrop of large existing projects that have been shut down by Covid-19 and are struggling to get back up and running.
- 2.4 Big announcements need to be backed up by the ability to deliver actual outcomes in a global environment that restricts or bans travel by experienced personnel and labour from overseas.

### **3. The context of RTF's comments**

- 3.1 The RTF comments on GPS 2021 are confined to the policy aspects that openly cast aspersions on commercial road freight and seemingly present a thinly-veiled attempt to demonise trucking as "unsafe", to help promote rail services in some sort of ascendancy in the minds of the public.
- 3.2 We see a policy approach drifting toward some form of political aspiration instead of leading New Zealand's infrastructure expenditure toward an economically viable strategic goal, providing for investment that would support the nation's economy, social integration, and commonly shared safety outcomes.
- 3.3 RTF has a significant interest in the GPS policy outline specific to road freight, as the new policy framework will almost certainly impact directly and indirectly on the road freight sector. It is within this context we offer our comments.

### **4. Applying the strategic direction to land transport investment; page 6**

- 4.1 RTF can accept some of what is outlined in this section (of the GPS overview) has possible merit, but whether what is proposed is strategic in every case is questionable. Some of the proposed expenditure aspirations suggest an absence of economic rigor and more of an ideological approach to the capability of the land transport freight sector. For example, para 12 makes it clear the Land Transport Fund (LTF) will contribute to the NZ rail plan. We find this aspect troublesome when the NZ Government has pulled back from investing in the roads of national significance programme and then subsequently turned to an expenditure approach that is somewhat biased, choosing to invest in a number of regional initiatives that are beyond the scope of traditional freight routes.
- 4.2 Even though the Government has committed to fund KiwiRail, an entirely government-owned and managed enterprise, we can only speculate the Crown has no real concerns about throwing good money after bad, ignoring the inconsistent productivity performance and functional limitations of NZ rail services over many previous years.
- 4.3 *Para 13* refers to the Crown's December 2019 investment (Commitment) to fund the land transport infrastructure to the tune of \$6.8B by taking trucks

off the road and making, in the GPS writers' views, the roads safer by moving more freight to rail.

- 4.4 The statement suggests truck freight traffic makes the roads unsafe and offers the promise of a roading utopia through moving freight to rail. This whole ideological approach is the crux of our opposition to the GPS and totally ignores reality.
- 4.5 The inherent weaknesses of rail as a freight service in an economy the size of New Zealand's was explained to a large degree in our February 2020 submission on the Land Transport (RAIL) Legislation Bill.
- 4.6 We object to the constant framing of trucks as "unsafe" on the roads. They are not unsafe; this is purely a perception pushed by the sectors of government and society that are opposed to the use of fossil-fuelled vehicles. Where there are safety concerns it is due to lack of infrastructure spend making New Zealand roads unsafe for the traffic demands placed on them; nothing to do with the performance of the vehicles themselves which are in fact, made "safe" via a number of New Zealand laws, rules and regulations.

## **5. Strategic priorities for GPS 2021; page 13**

- 5.1 Under *Safety para 43* - the RTF has already argued its views on the coalition government's road safety strategy and our concerns with the anti-truck sentiment expressed in that approach. This policy aspect is clearly showing up everywhere in Government policy documents and simply demonstrates certain discriminatory bias to vilify the trucking industry at every opportunity. Given road freight's contribution to New Zealand's health and wealth, this is both mystifying and disappointing.
- 5.2 This section argues the importance of improving transport connections within cities between regions and ports - a laudable approach - but then patches in the concept of mode neutrality. The whole section is a framework of conflicting ideals. We have the need for improved connectivity, supporting statements around the primary production in the regions being the core of the economy, and then this is followed by a statement, the transport system needs to support the most appropriate mode.
- 5.3 The conflict is around what is the concept of most appropriate mode? The only option to get primary products off the rural hinterland for processing and export is by truck. Trains don't go to the far reaches of New Zealand's farms, and any rail freight service would fail to deliver on that service on any number of well-recognised performance attributes, most notably time and cost.
- 5.4 If we look at the facts today, under the Covid-19 lockdown scenarios (and other recent disaster events in New Zealand), it is the commercial trucking industry that has continued to service food and fuel outlets and provide product to retailers to enable the country to work from home and for there to be some level of economic functionality. It is the inherent resilience and

adaptability of trucking that has enabled this to occur. Rail on the other hand, remains in the shade with largely empty rolling stock going backwards and forwards, further reinforcing its vulnerability to changing economic uncertainties. The limited rail network's vulnerability to disasters will not change, no matter how much money government throws at it.

- 5.5 *Para 47* postulates the strategic priorities overlap and by making places *safer*, people will adopt walking and cycling, further arguing the flawed case that by making rail investments, freight movements will be safer. This is illogical and simply ignores reality. We would ask for the evidence, and likely numbers, of inter-regional cycle and walking traffic.
- 5.6 We agree rail has an important role, but to fund it on an ideological aspiration when its service and performance capability is thwarted by design limitations, is a disservice to the tax payers and to those that pay FED and RUCs (vehicle owners and freight service operators) i to the LTF.

## **6. Transport outcomes; page 14**

- 6.1 An infographic and accompanying text on this page alludes to the complexity of the programme and highlights the wellbeing and liveability approach of the GPS. But the proposition rests on unsubstantiated assumptions and instead of being a progressive approach, assumes the investment in rail and elusive environmental aspirations will assist in that goal without necessarily having any evidence. This is big call and without some economic analysis, the expenditures on some aspects could out-weigh the benefits.
- 6.2 While acknowledgement that the transport system shouldn't actively harm the community, getting to the Road to Zero goals might be elusive. We stress this point in the context that while median barriers and road side treatments are all good, the fact is the roads in New Zealand, particularly in rural areas, are in many cases challenging for many motorists. Poor designs, incorporating poor repair and road surface patching techniques, just add to those challenges. Despite the best efforts of the safety engineers to improve road safety, reducing investment in the fundamental infrastructure is not an entirely viable solution for delivering on the safe outcomes goal, a point RTF emphasised in its submission on the Road to Zero discussion document.

## **7. Section 2.4 Strategic Priority: Improving Freight Connections; pages 20 21**

- 7.1 Many, if not most, of the outcomes set out in this section can only result if there is some form of market manipulation to the detriment of road freight. We do not support such market manipulation.
- 7.2 Road freight trumps rail every time simply due to customer demands and choices. The Ministry of Transport's own research, under the 2017-18 Freight Demands Study, confirms the importance of road freight, a point we highlighted above. The recent Covid-19 experience has confirmed the

adaptability of road freight to meet a disruptive market, something rail is unable to do.

- 7.3 That's not to say rail doesn't have a place. What is notable in the GPS is the shift in language from competition with road, to modal neutrality. But this is still far from actually acknowledging that in a small economy such as New Zealand's, either of those options is limited and the best option is in fact, that road and rail remain complementary. Rail cannot exist without trucks. And if small trucks are required to serve rail heads, as the rail advocates desire, the emissions shed from the additional trucks and transshipping technologies are simply counter intuitive to the goal of reducing greenhouse gases, which is another aspect of the GPS.
- 7.4 The most significant reason the swing towards road freight over the past 40 years has continued to grow, is the improvement in truck payload efficiency. This means, more efficient trucks carry more load, reducing the number of truck trips and consequently, reducing emissions per tonne of payload.
- 7.5 Over the past 10 years, efficiency gains through the uptake of HPMVs and 50 MAX have been realised in dairy, logs, livestock, aggregates, and petroleum distribution, as well as general household consumer goods distribution.
- 7.6 RTF finds it difficult to see a future with rail services supplanting trucks, especially when truck transport's environmental performance is continuing to improve with not only improved engine and power train technology, but also improved load management and delivery efficiency. All of this has been achieved without Government intervention by way of subsidies or favourable tax policy. In international transport circles, truck operators are considered one of the most innovative business groups in the world.
- 7.7 *Page 21* cites various indicators that are to be measured. We wait with anticipation to see if any of the stated deliverables of more reliable freight routes, more resilient freight routes, reduced greenhouse emissions, and reduced noise and air pollution, will actually come to fruition in a way that is truly measurable.

## **8. Section 2.5 Strategic Priority: Climate Change; page 22.**

- 8.1 This section continues to feed the desirability of creating an environment where rail and coastal shipping are favoured over road freight. The RTF commented on this in our submission on the *Green Freight Project*, a background paper on reducing greenhouse gas emissions from road freight in New Zealand through the use of alternative fuel. These comments were supplemented by the RTF's *Submission on NZ Government/MBIE Consultation document: A vision for hydrogen in New Zealand: Green paper*. In both these responses to government discussion documents, RTF outlined its views succinctly and factually and don't think there is any benefit in repeating our views here.

## 9. Section 3.4 Activity Class Framework; page 33

- 9.1 *Para 118* discusses in some detail the Road to Zero harm reduction initiative proposed by that policy, but having commented on that particular programme in our Road to Zero response to the discussion document, little benefit is gained by repeating our views here.
- 9.2 *Para 121* Rail Network and *para 128* coastal shipping are covering off the government's intention using altruistic nuances to *encourage* freight and logistics enterprises into using these modes as alternatives to what is presently used. Probably the biggest point of sensitivity for the road freight sector is the continuing financial support that rail needs just to maintain its present service capability, putting aside the cost of enhancing its capability, especially when the aftermath of the Covid-19 experience has thrown a dark shadow across much of the productive New Zealand economy. We have to question the value of a freight mode that has to be so heavily subsidised by the public purse and the equity of that State-subsidy situation with businesses that have to survive by running normal business efficiency models.

## 10. Concluding comments

- 10.1 The natural growth in road freight makes the Government's decisions to draw money from the National Land Transport Fund, using road user charges (RUCs) and fuel excise to artificially support rail projects and coastal shipping initiatives, seem all the more short-sighted. The Covid-19 hit to the economy has left a legacy that will take some time to overcome and we question the Government's financial resources to continue to heavily invest in and subsidise rail over roads in this environment.
- 10.2 The 2021 GPS policy was written for more settled economic climate and we wonder how much of it will continue to be valid within the foreseeable future.
- 10.3 The re-engineering of the transport system to satisfy ideology is not only costly, but flies in the face of economic reality. Using market manipulation, it attempts to engineer out choices for businesses who need to move freight to survive in a highly competitive global market. This makes it even more short-sighted to ignore the development of new roads critical to the national freight task, in order to put money into rail projects of dubious economic benefit.
- 10.4 RTF has continued to support asset renewal for rail as it's badly overdue, particularly for its critical infrastructure. What we don't support, is the Government, through policy documents such as the GPS, continually selling the notion that rail investment is a way to reduce "dangerous" or unsafe truck movements on our roads. RTF also rejects investment in rail over new, safer roads. Arguably, there should be investment in both road and rail infrastructure.
- 10.5 We reiterate our objection to the constant framing of trucks as "unsafe" on the roads. They are not unsafe; this is purely a perception pushed by the



sectors of government and society that are opposed to the use of fossil-fuelled vehicles. Where there are safety concerns it is due to lack of infrastructure spend making New Zealand roads unsafe for the traffic demands placed on them; nothing to do with the performance of the vehicles themselves which are in fact, made "safe" via a number of New Zealand laws, rules and regulations.

- 10.6 Road freight is simply more flexible and immediate than rail will ever be. There are some 93,000 kms of road in New Zealand, about 10% of which are State highways, and only 4,000 kms of rail track. That split isn't going to change significantly and the freight customers (the market) will continue to make business-based choices. We do not support any heavy-handed State intervention to counter market choices.
- 10.7 Fewer trucks on the road means fewer jobs, less economic activity, and less money in the pockets of all New Zealanders. The National Freight Demand Study proves that people and businesses choose the transport mode that best suits their requirements. In the 21<sup>st</sup> Century economy where timeliness and responsiveness are critical, more often than not, delivery by road stacks up best.
- 10.8 The New Zealand Initiative's Executive Director Dr Oliver Hartwich when he presented to the Epidemic Response Committee outlining his vision for New Zealand's social, political and economic future, made the following observations to the committee.

*It would also be a big mistake to spend money on projects just because they are 'shovel-ready'. What distinguishes a good project from a bad one is that a good project's benefits are greater than its costs.*

*New Zealanders must be able to trust in the steadiness of economic policy. Ludwig Erhard once said that 50 percent of economics is psychology. We therefore need a government that is predictable and steady. The last things we need are policy uncertainty, political surprises and monetary experiments.*

*What we do need is a recovery based on sound economic principles.*

- 10.9 The RTF concurs with Dr Hartwich.



Submission by the

**Bus and Coach Association NZ**

to the

**Ministry of Transport**

on the

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**GPS 2021**

**May 2020**

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## 1. INTRODUCTION

- 1.1. The Bus and Coach Association NZ (BCA) is a membership organisation representing the interests of the bus and coach industry. We provide industry leadership, advocacy, networking and services for more than 300 members (and their over 6,000 buses and coaches). The BCA represents the majority of New Zealand's bus and coach operators and domestic and international bus manufacturers.
- 1.2. The bus and coach industry is a significant contributor to New Zealand's economy. The industry contributes over \$1.2 billion to gross domestic product per year and employs over 10,200 people. In 2015 tourist expenditure on passenger transport (not including air travel) in New Zealand was \$3.4 billion and more than 1.24 million international visitors used bus and coach services.
- 1.3. The BCA welcomes the opportunity to provide a submission on the Government Policy Statement on Transport 2021 (the GPS).

## 2. POLICY INTENT

- 2.1. The GPS is reviewed every three years and is designed to guide and prioritise regionalised and national transport spending (with a 10-year outlook). GPS strategic priorities are intended to be realised via the NZ Transport Agency (NZTA) working with local government to create Regional Land Transport Plans (RLTPs) which 'combine' to create the National Land Transport Programme (NLTP).

### *Strategic Intent*

- 2.2. The government intends for this GPS to assist in achieving four strategic priorities:
  - 2.2.1. Safety – zero transport harm or transport deaths (as per Road to Zero Strategy)
  - 2.2.2. Better Travel Options – giving people more choice about how they travel
  - 2.2.3. Improving Freight Connectivity – better goods movement to assist economic development
  - 2.2.4. Climate Change – moving to inclusive and safe low carbon and low emission transport

### *Activity Class Changes*

- 2.3. There have also been changes to traditional National Land Transport Programme (NLTP) activity classes:
  - 2.3.1. Road to Zero – combining previous safety-related activity classes
  - 2.3.2. Public Transport – divided into 'services' and 'infrastructure'
  - 2.3.3. Coastal Shipping – changes to create a level playing field with other freight modes
  - 2.3.4. Rail Network – created to provide funding to KiwiRail to maintain/renew rail network (dependent on legislative change)
  - 2.3.5. Regional Improvements – Removed.

### *Government Commitments*

- 2.4. This GPS also sets four NLTP Government Commitments, across total investment in activities:
  - 2.4.1. Auckland Transport Alignment Project (ATAP)
  - 2.4.2. Let's Get Wellington Moving (LGWM)
  - 2.4.3. Road to Zero (70% of improvements to be outside Wellington and Auckland)
  - 2.4.4. Implementing the Rail Plan.

### *Investment Principles*

- 2.5. Guiding investment decisions stemming from GPS are high-level guiding principles to try and:
  - 2.5.1. underpin how investments should be made
  - 2.5.2. ensure decisions are transparent
  - 2.5.3. ensure decisions represent value for money
  - 2.5.4. ensure the most is made of the existing system but include planning and lead investment
  - 2.5.5. use innovation.
- 2.6. Positive aspects of this GPS for the BCA include:
  - 2.6.1. \$54 billion investment in transport
  - 2.6.2. No increases in Fuel Excise Duty (FED) or Road User Charge (RUC).

### **3. RAIL AND COASTAL SHIPPING**

- 3.1. Road users contribute to the National Land Transport Fund (NLTF) and other road asset funding primarily via FED, RUC and property rates for providing accessibility to the network. This creates a direct connection between asset funding and user fees and charges. For roading, benefit and use are essentially aligned. This is not the case for rail or coastal shipping currently, and nor will it be the case under the purview of this GPS.
- 3.2. This GPS, if the proposed *Land Transport (Rail Legislation) Amendment Bill* (the Rail Bill) passes, would undo longstanding road related NLTF hypothecation. The direct links between use and payment – and benefit to all therein of the current NLTF-road arrangement are not – and cannot be aligned with any proposal to use the NLTF for rail or coastal shipping. There is also little realistic possibility of rail ever being able to contribute what it would need to withdraw from the NLTF via proposed ‘Track User Charges’ or similar.
- 3.3. We disagree with ideological statements such as “Improving the rail network is good for our roads”<sup>1</sup> our position is that ‘Improving the road network is good for our roads’. As such, the BCA continues to oppose the use of NLTF funds for rail. Our submission on the Rail Bill in February 2020 contains more information on the rationale for this opposition.
- 3.4. This being said, we do support signing and integrating rail and coastal shipping planning with that of other modes. Funding levers aside, to create a properly functioning transport system, all modes should share the same planning process. Mode neutrality in planning is sensible, as long as each mode is benefitting in a manner directly attributable to their contributions and benefits.

### **4. NLTF PRESSURE**

- 4.1. As noted in our submission on the Rail Bill, the NLTF is already under substantial pressure and its future sustainability – even without funding being siphoned off to rail and coastal shipping – is of concern to all who contribute large amounts to it – such as commercial transport operators.
- 4.2. In basic economic terms, the clear opportunity cost of siphoning will be the maintenance and renewal of existing roading infrastructure – infrastructure used by, and paid for, by more organisations and people than rail or coastal shipping. It is not realistic nor fair to expect the NLTF to be able to fund two rundown infrastructure sets and three competitive freight modes in this way.

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<sup>1</sup> Draft Government Policy Statement on Land Transport (GPS) 2021, slide 15

- 4.3. Heavy vehicle users paid \$921million into the NLTF in 2017/18, and roading infrastructure maintenance and renewal has not kept pace with investment or use. Our membership has no appetite for more competition within an already stretched fund with rail and sea modes that will always lack the ability to fairly account for what will be their disproportionate use and reliance on the NLTF.

## **5. FUNDING LEVELS**

5.1. The BCA supports the following headline items in the GPS:

- 15% increase in State Highway (SH) maintenance, up to \$10 billion
- 5% increase in local road maintenance, up to \$8.5 billion
- \$10 billion for new infrastructure and safety investment
- over \$1 billion per year investment in Public Transport (PT), to increase by up to 40 % over 10 years.
- No increase in FED or RUC

5.2. The BCA has always supported new technologies where they allow value for money improvements alongside environmental gain. The funding levels and strategic outlook of the GPS support our view that buses, and not sole occupancy cars, are the best bet for significant benefits from both low carbon, safety and congestion perspectives.

## **6. CONCLUSION**

- 6.1. The BCA supports the proposed funding levels for roading and public transport in this GPS. We also support aligning the planning for all transport modes in New Zealand.
- 6.2. The BCA does not support funding rail or coastal shipping from the NLTF. This proposition is ideologically driven and will not lead to fair and transparent allocation of funds between modes based on contribution and use.

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# Draft Government Policy Statement on land transport 2021

To Ministry of Transport

May 11, 2020

Disabled Persons Assembly NZ

Contact:

**Prudence Walker**  
**Chief Executive**

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**policy@dpa.org.nz**

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## Introducing Disabled Persons Assembly NZ

The Disabled Persons Assembly NZ (DPA) is a pan-disability disabled person's organisation that works to realise an equitable society, where all disabled people (of all impairment types and including women, Māori, Pasifika, young people) are able to direct their own lives. DPA works to improve social indicators for disabled people and for disabled people to be recognised as valued members of society. DPA and its members work with the wider disability community, other DPOs, government agencies, service providers, international disability organisations, and the public by:



telling our stories and identifying systemic barriers



developing and advocating for solutions



celebrating innovation and good practice

## The submission

DPA welcomes the opportunity to input to what is an extremely broad and comprehensive Draft Policy Statement on land transport. We are also pleased that safety is one of the priorities of the Policy Statement. Given the breath and high-level nature of the Policy Statement we have only commented on the key issues for disabled people.

## Right to Accessible Transport

The United Nations Convention on the Rights of Persons with Disabilities<sup>1</sup> (UNCRPD) affirms the right of disabled people to access transport services and facilities on an equal basis with others and requires States Parties to engage with disabled people and our organisations on changes which would significantly impact on us.

As transport services and facilities have a direct and major impact on the lives of disabled people it is essential that our views are considered in all aspects of transport planning.

The UNCRPD Articles most relevant to our submission are:

- Article 4.3 Involving disabled people and our representative organisations in decisions that affect us<sup>2</sup>
- Article 9.1 Accessibility (including transportation)<sup>3</sup>
- Article 19 Living independently and being Included in the community
- Article 20 Personal mobility<sup>4</sup>

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<sup>1</sup> <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html>

<sup>2</sup> 4.3. *In the development and implementation of legislation and policies to implement the present Convention, and in other decision-making processes concerning issues relating to persons with disabilities, States Parties shall closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations.*

<sup>3</sup> <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html>

<sup>4</sup> <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-20-personal-mobility.html>



## Public Transport and infrastructure

DPA supports the Policy Statement's intention to improve and increase use of public transport. However, for disabled people to be able to use public transport on an equal basis with others it is necessary for not only the transport itself to be accessible, but all the associated infrastructure including: footpaths, crossings, ticketing, timetables, route information and maps and stations, bus stops and interchanges.

### The Accessible Journey

We draw the Ministry's attention to the concept of the accessible journey: door-to-door accessibility and in particular to the 2005 report The Accessible Journey by the Human Rights Commission<sup>5</sup> which outlines this concept.

### Driver Education and Responsiveness

Many disabled people report that they do not use public transport because of a lack of driver disability education leading to a lack of driver disability responsiveness. Investment in improving disability responsiveness would go a long way to improving accessibility for disabled people.<sup>6</sup>

**Recommendation 1** - that the Policy Statement be re-framed to incorporate the concept of the accessible journey.

**Recommendation 2** – that the Policy Statement signals Government's intent that transport infrastructure must be accessible and a date for this to be achieved.

**Recommendation 3** – that the Policy Statement provide for a programme of public transport driver disability education in order to improve disability responsiveness.

### Accessible Buses

We are disappointed that the Policy Statement does not provide a date by which all buses must be wheelchair accessible. The Policy Statement would be the place for Government to notify the transport authorities and companies of the date by which all buses used for public transport are to be accessible.

**Recommendation 4** – that the Policy Statement incorporate a date by which all buses used for public transport must be fully wheelchair accessible.

### Standardisation of Access

We would also like the Policy Statement to propose standardisation across Aotearoa in for example: the types of mobility devices that can be taken on buses, the length of such devices etc.

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<sup>5</sup> <https://www.hrc.co.nz/our-work/people-disabilities/past-projects/accessible-journey/>

<sup>6</sup> <https://www.odi.govt.nz/disability-action-plan-2/the-disability-action-plan/>

**Recommendation 5** – that the Policy Statement ensure national consistency on issues such as the type and length of mobility devices that can be taken on buses.

### **Bus Announcements**

There is inconsistency throughout the country on bus announcements: some buses provide both visual and spoken stop announcements, while others provide such information only visually or not at all. We believe that the Policy Statement on land transport is the appropriate document for Government to signal a nationwide commitment to the delivery of on-bus announcements both visual and spoken.

**Recommendation 6** – that the Policy Statement make a commitment to ensuring that on-bus announcements are provided both visually and spoken.

### **Catching the Right Bus**

Again there is regional inconsistency as to whether people waiting on buses have to signal the bus to stop: this is a particularly risky issue for people who are blind or vision impaired as they can't always tell if the approaching vehicle is a bus or a truck and there are obvious safety issues in expecting blind and vision impaired people to stand at the edge of a footpath with their arm extended into oncoming traffic on the road. The Policy Statement on land transport is an obvious place to inform transport authorities of the Government's expectations on hailing buses.

Another area of inconsistency is whether buses have an external speaker system to announce which bus is stopping. This is helpful to many disabled people and again the Policy Statement would be the place to recognise this good practice and signal Government's intention for it to be implemented across the bus network.

**Recommendation 7** – that the Policy Statement make it clear that Government expects that buses will pull into any bus stop where a person who is using a white cane, guide dog, or other mobility device is waiting.

**Recommendation 8** – that the Policy Statement provide a date by which all buses must have external speaker systems to announce the number and details of the approaching bus.

### **Total Mobility Scheme**

We are pleased to see that the Total Mobility (TM) Scheme is mentioned in the Draft Policy Statement. However, supply issues make the TM scheme unusable for many disabled people because there are so few wheelchair accessible vans on the road. We need investment that incentivises operators to purchase and operate wheelchair accessible transport.

**Recommendation 9** – that Government work with all transport authorities to increase the number of wheelchair accessible taxis by incentivising the purchase and running of accessible vehicles.

### **Nationalising the Total Mobility Scheme**

There are a number of regional variations and inconsistencies in the Scheme that we wish to see standardised throughout the country. These include issuing a national TM card that can be used in all locations; and standardising the regional fare subsidy.

**Recommendation 10** – that the Total Mobility scheme card be a nationwide card and that the regional fare subsidy be standardised.

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## FEEDBACK

Draft Government Policy Statement on Land Transport 2021

Healthy Families Waitākere

April 2020

**Healthy Families Waitākere contact:**

Kerry Allan

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## About Sport Waitakere and Healthy Families Waitakere

Sport Waitakere (SW) was registered as a Charitable Trust in 1991 and is a Regional Sports Trust (RST). Sport Waitakere has extensive experience in working strategically, collaboratively, and across sectors and settings to achieve positive outcomes for our community by engaging with communities by offering locally led solutions and a wide range of services via projects, events and programme delivery. We align with the strategic outcomes of Aktive - Auckland Sport and Recreation and as such provide a means to reach local communities through the Auckland Approach by offering a local presence. We also work closely with the strategic outcomes of central and local government and work within the boundaries of Auckland Council's three Local Boards – Whau, Waitakere Ranges and Henderson Massey.

Healthy Families Waitākere is a prevention-based initiative, uniting community leadership to improve health and wellbeing equity where we live, learn, work and play. Funded by the Ministry of Health, Healthy Families NZ is implemented in ten regional locations with higher than average rates of preventable chronic diseases (such as diabetes and obesity) and/or high levels of deprivation. Our team work to make the changes in our communities and empower people to eat well, be physically active, be smoke-free and only drink alcohol in moderation. Through the collaboration and co-design, community leaders identify, ideate and implement systems change to help people make healthier choices, lead healthier lives and communities to thrive. These environments include, but are not limited to early childhood education settings, schools, workplaces, food outlets, sports clubs, marae, businesses, places of worship and more. Healthy Families Waitākere is led by Sport Waitākere and is one of ten Healthy Families NZ communities across the country.

## General Feedback

- We support the Government Policy Statement on Land Transport to ensure consistent direction at a national level to facilitate policy and assist in good decision making around investment. It will align the Regional and Local Transport plans to ensure a consistent nationwide transport network that will help New Zealand be ready to meet the objectives outlined in the Road to Zero strategy and Zero Carbon Act.
- We support the Strategic focuses of Safety, Better Travel Options, and Climate Change. This further reinforces the critical need to create spaces for people over vehicles and encourage active modes of transport to improve people's wellbeing.
- Sport Waitākere and Healthy Families Waitākere acknowledge the important place of mana whenua and their whakapapa links to Hikurangi / the Waitākere Ranges. Therefore, mana whenua and all Māori are a priority in the planning of programmes, workshops, activations, mentoring, resources and events – so as to ensure they continue to lead healthy and active lives. We recommend Māori governance and leadership at every level to support Māori to achieve their aspirations. Guidelines outlining expectations that Local and Regional Transport Plans need to meet would help achieve this outcome. It would also create a framework for accountability against measurable deliverables.
- We recommend funding and resource be prioritised in areas with high deprivation and low levels of active travel, particularly in communities with higher numbers of Maori, Pasifika and Asian people.
- We see an opportunity for the transport system to shape land use, urban form and design streets that create more playable neighbourhoods and communities with child friendly streets. Play Streets are one example of this, leading to equitable access to streets, increased physical activity, social connection within neighbourhoods, and increased perceptions of safety. The benefits of social

interaction for mental and physical wellbeing can also reduce the rates of preventable chronic disease and reduce the burden on our health system.

- We support the GPS guiding the transport sector to work with housing and urban authorities to ensure active travel. We recommend taking a Healthy Streets approach. This internationally recognised framework outlines key measures to check the 'health' of a street and offers design criteria to creating streets that encourage multi-modal use. This aligns well with the key outcomes of this framework outlined in this Draft Government Policy Statement on Land Transport - Inclusive access, Healthy and Safe people, Economic Prosperity, Environmental Sustainability, and Resilience and Security.



- We acknowledge many outcomes include creating safer roads, footpaths and cycleways throughout the GPS. These are key to deliver on the Strategic focuses of Safety, Better Travel Options, and Climate Change. They will also help meet the key outcomes of this Proposal.
- To facilitate innovative solutions across the transport system, we recommend meaningful engagement with communities as part of implementation. By presenting

the voice of community as of equal value to the voice of experts, our spaces and places will be better for everyone.

- We recommend that highly productive land should be given adequate consideration and prioritised in areas where planned transport infrastructure may occur. We see this land as a precious taonga that builds adaptive resilient communities, improves our local food systems and needs to be maintained. The Covid-19 pandemic has also raised questions over current practices around growing food. Planning local food systems, where highly productive land is available, into communities and neighbourhoods will help create better and more equitable access to food.

We hope you can consider our say in your feedback discussions on the draft Government Policy Statement for Land Transport 2021.

Ngā mihi

Kerry Allan

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**CCS**  
**disability action**  
Including all people

TE HUNGA HAUĀ MAURI MŌ NGĀ TĀNGATA KATOA

**Submission on the  
Government Policy Statement on Land Transport  
2021**

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Pia Huston

Phoebe Grace Eden-Mann

Samuel Murray

2020

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## Executive Summary

- Transport is the glue that holds our communities together.
- In 2013 there were an estimated 1.1 million disabled New Zealanders
- All types of impairments can create access needs
- Access needs are no problem if the built environment and transport is accessible.
- It is important to assess the safety of the whole transport system for everyone. This means that at risk groups such as disabled people and pedestrians should be visible in the road safety data.
- The government needs to ensure that disabled people are getting the same opportunities as non-disabled people and are not being isolated, preventing them from accessing work, social, and educational opportunities.
- The government needs to disaggregate the indicators in Strategic Policy 2 by impairment or access need.
- Future proofing New Zealand roads and public transport will benefit disabled people as well as the general public

## Recommendations

1. Deaths and serious injuries should be disaggregated by impairment or access need and other at-risk groups, such as older people, as well as by whether they are pedestrians.
2. Disaggregate the indicators in Strategic Policy 2 by impairment or access need.
3. Desired result 4 needs an additional indicator on the accessibility of public transport for disabled people. This new indicator should say the percentage of public transport vehicles are accessible to disabled people.
4. Desired result 5 needs an indicator that looks at number of disabled people using public transport. This new indicator should say number of disabled people using and accessing public transport in urban areas (by region).
5. The government should recognise the work done by the transport and disability sector in New Zealand and consult them on big projects like this.
6. Measure the participation of disabled people in the transport system

## About Us

CCS Disability Action is a community organisation that has been advocating for disabled people to be included in the community since 1935. We provide direct support to approximately 5,000 children, young people and adults through our 18 branches, which operate from Northland to Invercargill. Our support focuses on breaking down barriers to participation. We receive a mixture of government and private funding.

Accessibility is a major focus for our organisation. CCS Disability Action runs the Mobility Parking Scheme. This scheme currently supports more than 150,000 people to more easily access their communities and facilities. We have a nationwide network of access coordinators who work with local governments as well as the building and transport industries. We are a member of the Access Alliance, which is pushing for a new Access Law. Our fully owned subsidiary, Lifemark Design Ltd, advocates for and provides universal design guidelines to improve the accessibility of New Zealand housing. We have developed ways to collect data on accessibility, including the Measuring Accessible Journeys project and the Street Accessibility Audits.

## Introduction

Transport is the glue that holds our communities together. It is how we get to work, see friends, meet new people, buy groceries, and generally live our lives. Whether we use cars, buses, walking, cycling, ferries, trains and/or planes, transport is a vital part of people's lives.

### Key facts about disability and access needs

In 2013 there were an estimated 1.1 million disabled New Zealanders, almost one in four of the population. There are an estimated 632,000 people with a physical impairment (14% of the total population). There are an estimated 484,000 people with a sensory impairment (11% of the total population). An estimated 89,000 people have a learning disability (2% of the total population) and 122,000 people have a psychological/psychiatric condition (5% of the total population). Further, 53% of disabled people have more than one impairment type (Statistics New Zealand, 2014).

All these types of impairments can create access needs, from physical access needs to communication and signage access needs. Disabled people are also not a static group. The line between being non-disabled and having an impairment is thin. All people can gain impairments, including temporary ones, which in turn give them access needs. For example, someone over the age of 65 could acquire a disability such as arthritis or hearing loss which would affect their access needs. Access needs are no problem if the built environment and transport is accessible. If not, people can be forced out of the workforce, their community and even their home.

It is important to realize that access for disabled people is not just about getting from destination A to destination B, accessible transport for disabled people is about full participation and inclusion in society which they are guaranteed under the Convention on the Rights of Persons with Disabilities. Inclusion means having a feeling of belonging. So, having the ability to move in society for employment, education, social interaction and participation is key to disabled people belonging as equal citizens.

## **Section 2.6: Indicators for how progress will be measured**

The government has included some good indicators in their Government Policy Statement on how they will measure their progress. However, these indicators overlook a significant group of people. 24% of the New Zealand's population in 2013 stated they had a disability (Statistics New Zealand, 2014). The indicators need to be disaggregated by impairment or access need. Put simply disabled people need to be visible in the Government Policy Statement's indicators.

### **Strategic Policy 1**

It is important to assess the safety of the whole transport system for everyone. This means that at risk groups such as disabled people and pedestrians should be visible in the road safety data. Deaths and serious injuries should be disaggregated by impairment or access need and other at-risk groups, such as older people, as well as by whether they are pedestrians. It is vital to see if some groups are experiencing more deaths and injuries than others.

## Strategic Policy 2

The government also needs to disaggregate the indicators in Strategic Policy 2 by impairment or access need. The government must ensure that disabled people are getting the same opportunities as non-disabled people and are not being isolated, preventing them from accessing work, social, and educational opportunities (Article 9 Accessibility, 2008). Furthermore, when considering the poor welfare experienced by disabled people, the safety concerns that prevent them from using different forms of transport it is clear these factors need to be addressed and that failure to do so will place a burden on disabled people and the whole population. **Invalid source specified.** This can be addressed by measuring participation of disabled people in the transport system. CCS Disability Action and its partners have developed and trialled a system to do this and demonstrated that access improvements improve participation by disabled people (Burdett, Locke, & Scrimgeour, 2016).

Desired result 4 needs an additional indicator on the accessibility of public transport for disabled people. We believe the government in the long term should aim to make New Zealand's transport systems 100% accessible overall. But for now, this new indicator needs to be an extension to the already proposed indicator. This new indicator should measure the percentage of public transport vehicles that are accessible to disabled people. This should include access for people with a diverse range of impairments including vision, hearing, physical impairments as well as learning disability.

By adding a new indicator about accessibility on public transport for disabled people the government will be complying with article 9 of the Convention on the Rights of Persons with Disabilities. This article requires the Government to ensure disabled people have access, on an equal basis with others, to the physical environment. This includes transportation (Article 9 Accessibility, 2008).

Desired result 5 needs an indicator that looks at number of disabled people using public transport. It is important to add this indicator as it will help the government anticipate and respond to the future demand for accessible transport. The new indicator should be similar to indicator K – number of disabled people using and accessing public transport in urban areas (by region).

Furthermore, this proposal ignores some key issues around accessible transport and disabled people in general. By not recognising some of these issues below the government will be hindering a quarter of the population.

Four further points that seriously need to be addressed on the Government Policy Statement on Land Transport:

- Assess diverse range of user perspectives on land transport
- Consult with the disability community and transport professionals
- Develop a way to collect data of disabled people and accessible transport. As the Government Policy Statement has high level goals that have no base line data
- Have the same standards across the whole country

## Recommendations

- Deaths and serious injuries should be disaggregated by impairment or access need and other at-risk groups, such as older people as well as by whether they are pedestrians.
- Disaggregate the indicators in Strategic Policy 2 by impairment or access need.
- Desired result 4 requires an additional indicator on the accessibility of public transport for disabled people. This new indicator should indicate the percentage of public transport vehicles that are accessible to disabled people.
- Desired result 5 requires an indicator that looks at the number of disabled people using public transport. This new indicator should show the number of disabled people using and accessing public transport in urban areas (by region).
- The government should recognise the work done by the transport and disability sector in New Zealand and consult them on big projects like this.

## Conclusion

Currently, the Government Policy Statement overlooks New Zealand's disability community. By failing to consult with disabled people in the planning stage resulted in disabled people been essentially planed out. There is a strong need for indicators to be disaggregated by impairment or access need and for additional indicators to

ensure disabled people are not overlooked. This would also inform government decision-making by providing evidence of participation by disabled people. New Zealand's future roads and public transport need to be accessible, affordable, integrated, safe, responsive and sustainable for not only disabled people but also the general public.

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## Submission on the Draft Government Policy Statement on Transport 2021

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### Introduction

This submission is made on behalf of the Grey Power New Zealand Federation Inc.

The Grey Power New Zealand Federation (GPF) is a non-sectarian and non-party political, advocacy organisation that aims to advance, promote and protect the welfare and well being of older people. Made up of some 75 individual Associations with an overall membership of approximately 60,000, GPF is the premier organisation representing older New Zealanders.

We wish to be heard in support of our submission.

Contact: Pete Matcham  
email: s 9(2)(a)  
Date: 2018-05-02

### Summary

We strongly support the draft GPS 2021 on land transport, noting that it is in essence, a refinement to the 2018 GPS. We have accordingly limited our comments here to those elements that have changed and continue to endorse the fundamental principles, especially basing the transport Outcomes Framework on the Living Standards Framework. We continue to support the (re-defined) strategic priorities of Safety Better Travel options, addressing Climate change and improving freight connections.

Noting that older people are over represented in road related deaths and injuries on a per capita basis and that the number of deaths per 100,000 of older people in road crashes stayed constant against a falling overall trend in the period 2008 - 2014, we particularly welcome the emphasis on safety and a people centric design philosophy. As such we fully endorse the commitment in the draft GPS to the 'Road to Zero' and its inclusion as a specific activity class. We consider that the reframing of the activity classes relating to public transport in GPS 2018 into two activity classes separating services and infrastructure gives greater clarity on investment, and more transparency in the evaluation of delivery against both outcomes and strategic priorities.

We also support the inclusion of the Rail Network and Coastal Shipping as new activity classes.

We support the defined strategic priorities and are particularly pleased to note that the GPS specifically acknowledges the interconnectedness of these priorities. We consider that previous investment strategies have been too siloed and have failed to adequately consider fully, societal and environmental impacts. We consider the explicit acknowledgement of interconnected priorities addresses this at a strategic level. However, we suggest that greater clarity around the impact of Movement as a Service on these priorities would be beneficial.

We are also concerned that the draft GPS lacks a clear policy framework to support the delivery of the defined strategic outcomes. Whilst the principles for investment are necessary, we do not consider them sufficient. We consider them in isolation to be insufficiently transformative and that they could easily be utilised to bolster the status quo. We suggest that these principles be strengthened by the inclusion of a hierarchy of treatments eg fig 1. We believe that mandated inclusion of this hierarchy in decision making would alleviate the observed disruption to projects through political pressure. It would also provide a stable basis for operational level planning and resource allocation that avoids fragmentation of effort into a series of piecemeal un-coordinated projects <sup>1</sup>. This approach also aligns with the wider framework by considering land use and service delivery as integral parts of the wider transport system.

<b>Priority 1</b>	Minimise demand	Manage the reasons why transport is needed and the context in which transport demand is derived, to deliver the same access to services and activities with less powered/motorised transport.
<b>Priority 2</b>	Enable modal shift	Enable the choice of transport modes with the lowest environmental impacts, and enable easier changes between modes.
<b>Priority 3</b>	Optimise system efficiency	Increase all efficiency measures of transport modes and their use, particularly in terms of gCO <sub>2</sub> /km for passengers and gCO <sub>2</sub> /tkm for freight.
<b>Priority 4</b>	Increase capacity	After optimisation of the first three steps, any capacity increases that are required should be prioritised to the most efficient and sustainable modes.

Fig 1 A Transport system hierarchy <sup>2</sup>

<sup>1</sup> In Military theory, the “Operational Art,” represents the level of planning that connects the details of tactics with the goals of strategy. In business terms, the operational level evaluates business ends, ways, and means to plan and execute operations and campaigns to support achievement of strategic goals.

<sup>2</sup> Institution of Mechanical Engineers, 2013, retrieved 20200510 from <https://www.imeche.org/docs/default-source/1-oscar/reports-policy-statements-and-documents/transport-hierarchy.pdf?sfvrsn=0>

Similarly we consider that whilst the intent in the statement of Ministerial expectations is laudable it lacks concise clarity. We are concerned that as presented this could become the object of goal transference, with a tick box approach to each component rather than a focus on these as a means of delivering the strategic objectives. We are equally concerned that these criteria as presented could be subverted to accommodate the status quo.

We agree that the indicators proposed for the strategic objectives are relevant and necessary. At this stage we reserve judgement as to whether they are sufficient.

At a funding level we support the hypothecation of the Land Transport Fund to all forms of surface transport, noting again the interconnectedness of each mode to the strategic priorities and the impact that investment in any given mode can have on these.

We acknowledge that significant changes to surface transport in mode share, energy input, and usage patterns, are required to meet all strategic objectives, but in particular the Road to Zero and Climate change objectives. We consider the latter will require both greater funding and economic incentives, both positive and negative, if they are to be achieved within the required time frame. We consider that within the scope of the fund, these incentives should be revenue neutral. We also consider that, to conform to the principles of mode neutrality as well as to have maximum efficiency as a price signal, fiscal incentives to minimise climate change emissions should be universally applied to all forms of surface transport, not restricted to fuel purchased for on road use.

With regard to specific activity classes, we consider that public transport and active mode infrastructure has been grossly under-funded in the past and that the increased priority given to environmental effects is long overdue, noting especially the strong correlation between transport emission density and excess mortality and morbidity amongst the elderly. We also consider that there should be a specific acknowledgement in the Public Transport Service class, of the need for innovative solutions in parts of NZ where the population density is insufficient to support traditional public transport solutions

## **Detailed comments**

### **Strategic Direction**

We support and acknowledge the refinement of the four strategic goals of Safety, Better Travel options, Climate Change and Improving freight connections. We also agree with the re-definition of 'Value for money' as a principle across all objectives, rather than a separate objective. We heartily endorse the requirement to fully consider and evaluate co-benefits when developing business cases. We are also particularly pleased to note the inclusion of Climate Change as a strategic objective in accordance with our submission on GPS 2018.

We again emphasise the need to recognise and consider the need to link transport and urban development strategies, and the essential role of increased public transport, both traditional and mass rapid transit in both facilitating and increasing equity of access (para 40 &41)

## Safety

We fully support the ethical basis underpinning the Road to Zero, and the use of the 'Safe systems' approach to achieving this. We would emphasise the importance of the overarching need for land transport systems to be people focussed with safety as the overriding principle. We also support the inclusion within this priority area of inclusive access, noting again the importance of this to older people, and in particular the high degree of co-benefits associated with it.

We support the aim to reduce Deaths and Serious Injury (DSI) from road crashes by 40% by 2030. We fully support a data driven approach to the targeting of infrastructure projects based on DSI incidents. We also consider that (relatively) low cost infrastructure improvements with proven high effectiveness, e.g. side rumble strips and median barriers should be given precedence. We support the improvement to active mode infrastructure, particularly where these address areas such as junctions and roundabouts that currently prioritise ease of vehicular movement over accessibility for all, noting again the high level of co-benefits associated with active mode use.

We support the proposed increase in enforcement including drug testing and alcohol interlocks. We also support the commitment to sustaining road policing numbers. We fully support measures to tackle unsafe speeds and driver distraction particularly cell phone usage.

With regard to the safe speeds, we are concerned that more than half of vehicles on urban roads routinely break the 50km/h speed limit<sup>3</sup>, and given the importance of safe pedestrian movement to both our members and to our mokopuna, we suggest far greater enforcement and a major increase in penalty for speeding should be a priority.

We repeat the concern noted in our submission on the 2018 GPS that the penalties for speeding are in stark contrast to those applying to driving when impaired by alcohol or drugs. We consider that penalties for any behaviour impacting on safety should reflect their harm potential independently of the behaviour. For example, the risk factor of a casualty crash from exceeding the speed limit by up to 10km/h is similar to an excess blood alcohol level of between 250 and 400 mcg, but the penalties currently differ by a factor of five.

We agree that improvements to rail through the NZ Rail Plan, and the reforming of land use and urban form are essential components and contribute to better travel options as well as improving safety.

We support the suggested indicators of DSI and hospitalisation numbers, and DSI by causal factor as appropriate and necessary.

## Better Travel options

The purpose of any transport system is to enable access to services, recreation and work. We applaud the emphasis on transport investments that prioritise people over vehicles through making streets accessible with an accelerating mode shift. We also applaud the continued support for Total Mobility, and the Disability Action Plan. We fully support the move to provide greater integration between transport and urban planning, with the goal of 'liveable cities'. We consider the objective of public spaces and street-scapes where the primary purpose is the ability of people to meet and

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<sup>3</sup> Safer Journeys interim Evaluation, 2015, Martin Small Consulting

for children to play and not ease of access for vehicles, particularly important for older people, citing once again the co-benefits in health and social integration.

Availability and frequency of public transport is a major determinant of use especially for the disabled and elderly. We consider that improvements to public transport service levels, particularly the integration of multi-mode journeys to maximise convenience and ease of use are an essential component of delivery, and accordingly we consider the delivery of ATAP and LGWM as essential components of accessibility for Auckland and Wellington respectively. We also support the development of high-speed inter-city commuter rail links, as well as investment to improve the capacity and resilience of metropolitan rail networks.

We suggest that to be truly strategic in scope, the Better travel options priority area needs to acknowledge and address the problems of access peculiar to provincial New Zealand. We consider that this is deficient in two primary areas. Firstly a lack of a viable and affordable public transport system in areas where the population density is insufficient to support traditional solutions. Secondly the degree to which the preferencing of through traffic, especially heavy goods vehicles, has disrupted safe access to services within the many provincial and rural towns bisected by state highways. We note especially the cascade effect this has on the ability or willingness to use any form of transport other than private cars, and that restriction of access from fear of crossing busy roads is a major contributor to social isolation.

We support the suggested indicators.

### **Improved Freight connections**

We support the commitment to maintain the road and rail infrastructure that support efficient movement of freight. As such we fully support the intent to improve resilience through improved infrastructure, route duplication and diversification of freight transport to modes that maximise safety and minimise greenhouse gas emissions and air pollution.

We consider the suggested indicators to be appropriate.

### **Climate Change**

A major concern of Grey Power Federation and all older people is the legacy we leave to our grandchildren. In addition to the medium and long term effects on us all from carbon emissions there is also the short term concern of the effect of NO<sub>2</sub> and particulate emissions on health which affect older people and the young more adversely than the general population.

Noting the high contribution of both climate affecting gases and particulate air pollution from road transport and the exacerbating effect of the preponderance of old and inefficient vehicles in the NZ fleet, we consider that economic intervention is essential if effective change is to be realised.

We consider that this can best be addressed through a whole of system approach including encouragement of mode change through public transport infrastructure and service investment.

We consider that graduated registration fees based on emissions produced, and banning the importation of any new vehicle not Euro 6 compliant, and any second-hand vehicle not Euro 5 compliant are essential first steps.

We consider demand management an essential part of any reduction in environmental harm. In the long term we consider that the introduction of nationwide 'pay as you drive' revenue collection based on time and place of use pricing should be the objective, but in the short term congestion charging is a proven tool for reducing traffic and hence pollution in cities and should be adopted as part of both ATAP and LGWM. We further note that through vehicle registration identification, these systems can also be used to apply emission charging at point of entry to the designated area.

In this context we would also support the use of local fuel taxes to provide additional funding for infrastructure to address local problems.

## Indicators

As indicated in the sections above, we agree that the indicators suggested are necessary and appropriate. We reserve judgement as to whether they are sufficient.

## Investment in land transport

### Funding

We agree with the noted expectations on funding and financing, especially the consideration of captured value offset and targeted funding. We also wholeheartedly support the principle of optimising whole of life costs and the exploration of alternate financing approaches. We would however note that there is little evidence to suggest that Private Public Partnerships deliver benefits to the public purse equivalent to the risk borne by the Crown in these contracts<sup>4</sup> and frequently have to be bailed out by the state at a greater cost than had they been fully state funded and financed from inception<sup>5</sup>.

We heartily endorse the need for transparency in any alternate financing proposal and explicit disclosure of the trade offs made.

### Principles for Investing

We support the principles of alignment with strategic direction, optimum achievement of GPS priorities (effectiveness) and cost efficiency based on total lifetime costs and the inclusion of all non-monetised costs and benefits

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<sup>4</sup> History RePPeated: How public private partnerships are failing, 2018, Collective , Eurodad , Latindadd , ODG (Observatorio de la Deuda en la Globalización) retrieved 20200402 from <https://www.cadtm.org/History-RePPeated-How-public-private-partnerships-are-failing>

Anderson, 2012, Another Australian PPP fails – will we learn from it? Retrieved 20200502 from <https://www.greateraukland.org.nz/2012/11/13/another-australian-ppp-fails-will-we-learn-from-it/>

<sup>5</sup> Abdul Rahman, Ismail & Memon, Aftab & mohd zulkiffli, Nora. (2014). Failure Reasons of PPP Infrastructure Projects: Case Study of Kuala Lumpur LRT Project. Life Science Journal. 11.

## **Making the most of existing transport network**

We agree that optimising the use of existing networks through demand management, behaviour change and land use integration are essential components of any strategy based on the Living Standards Framework.

We consider that network charging based on time and place of use is the ideal, but recognise that this will require a substantial investment and so we suggest that it should initially be limited to high demand areas that are easily circumscribed with defined entry/exit points. We suggest that congestion charging should be a fundamental part of both ATAP and LGWM, integrated with greater availability of public transport, active mode and micro mobility options.

We agree that lead investment can be beneficial and should be part of integrated spatial planning in conjunction with local authorities.

## **Dedicated funding for transport priorities**

We support the hypothecation of the fund to 'today's' transport priorities.

## **Activity class framework**

We support the inclusion of Rail and Coastal shipping as activity classes to embed mode neutrality in the framework. We also support the consolidation of the 2018 safety classes into the Road to Zero class. We consider this latter improves transparency of funding and clarity of purpose. The singular objective of safety prevents goal transference which we consider occurred where the objective was delivered through road and highway improvement activity classes.

We note that travel demand management is to be funded from multiple activity classes. Whilst we understand the logic behind this, we are concerned that this may lead to uncertainty of funding leading to delay and a loss of clarity in objectives.

We agree that the separation of public transport into Services and Infrastructure gives greater clarity of investment.

We lack the data and expertise to comment on the proposed funding ranges.

We note the investment expectations to meet Government Commitments to ATAP, LGM, Road to Zero and the New Zealand Rail plan which cross multiple activity classes. We support these commitments as key to meeting the strategic outcomes but cannot comment on the relative merit of funding levels.

# **Government Policy Statement on Land Transport 2021/22-30/31**

## **Draft for engagement**

### **Submissions of the RMTU**

11 May 2020

New Zealanders have been asked to share their thoughts on the draft policy statement on Land Transport. The Rail and Maritime Transport Union (RMTU) have members that work within road, rail and ports. Within rail, the members work in metropolitan rail, freight and tourism sectors. Our members work on the front line of these essential services serving New Zealanders and keeping us connected. As long as there has been rail, the workers have been unionised. The RMTU has a current membership of 5239, of whom 3271 work within rail. The RMTU has survived many challenges including the privatisation of rail and its renationalisation. It has experienced the managed decline when rail was starved of funding and which put our member's lives at risk. Our worst experience led to an inquiry into the safety of rail. Health and safety is top of our mind as we know how quickly a life can be taken in rail.

The RMTU has lobbied hard for rail, and it is pleasing that it is part of the Government Policy Statement on Land Transport (the GPS). But rail is still a tack on – almost an after-thought - with road being seen as the dominant mode of transport.

The GPS is about investment. The GPS is supposed to take into account a range of policies and strategies. Missing from these policies are those belonging to WorkSafe. WorkSafe policies need to form part of the Land Transport GPS, as WorkSafe administers the Health and Safety at Work Act 2015 which includes rail and road workers. If WorkSafe as an agency along with its policies are omitted from the GPS some valuable insights will be lost. Some of the best insights into safety in transport are to be found in the excellent 2019 literature review: Mathern, C. (2019). Literature review of risk factors in the road freight transport industry. Wellington: WorkSafe New Zealand.

### **Modal shift to rail**

In New Zealand, 80–90% of the total domestic freight is carried by trucks (George, 2018)<sup>1</sup>. Only 7% and 2% of freight is carried by rail transport and coastal shipping, respectively (Deloitte, 2014). The GPS needs to place more emphasis on the modal shift from road to rail, and measure the modal shift.

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<sup>1</sup> George, C. T. (2018). An inquiry into contextual factors impacting the occupational health, safety, and well-being of New Zealand truck drivers: An ecological systems approach. Doctoral thesis, Auckland University of Technology, Auckland



The RMTU has been part of the team developing the Draft NZ Rail Plan but the concepts within the Draft Rail Plan are not well integrated into the Land Transport GPS. A new section within the GPS needs to set out the key concepts of the Draft Rail Plan.

### **Forestry**

The GPS should specifically target a modal shift for logs from trucks to rail, and put in place the infrastructure (such as hubs) to support the modal shift. One of the indicators should be a quantification of the modal shift of logging tonnage from truck to rail.

### **Regional Rail**

The GPS mentions metropolitan rail and rail freight but not a shift towards a regular/enhanced regional rail service such as between Hamilton and Auckland or Christchurch and Dunedin for example.

### **Climate change**

The GPS fails to address the continued growth of electrification of rail as a contribution towards our environmental goals.

### **Worker and public safety**

The GPS measures road deaths and serious injuries, but not specifically work related deaths and serious injuries in road and rail. It notes that one person is killed while travelling on our roads every day and every year nearly 3,000 more people are seriously injured. But one needs to turn to the Road to Zero Action Plan to find out that **about 25% of the deaths on our roads involve someone driving for work.**

The policy initiatives in the Road to Zero and WorkSafe's policy initiatives need to be better integrated with the GPS. The GPS does not seek to co-ordinate public and worker safety; a co-ordinated strategy is needed involving the workers, and their union along with the businesses that operate in the sector and transport users.

The politics and commercial pressures that underpin the road transport industry are not openly acknowledged in the GPS. Deregulation of the road freight transport industry has contributed to the overall deterioration of working conditions for long-haul freight drivers' working conditions.<sup>2</sup>

The competitive nature of the road transport industry has flow-on effects to both workers and managers/supervisors and in public safety. Research has shown that the pressure that is placed on businesses to remain price competitive has influenced managers, who are then likely to create poor working conditions for their workers

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<sup>2</sup> Apostolopoulos, Y., Lemke, M., & Sönmez, S. (2014). Risks endemic to long-haul trucking in North America: Strategies to protect and promote driver well-being. *New Solutions: A Journal of Environmental and Occupational Health Policy*, 24(1), 57-81. Belman, D. L., & Monaco, K. A. (2001). The effects of deregulation, de-unionization, technology, and human capital on the work and work lives of truck drivers. *ILR Review*, 54(2A), 502-524.

(employees or contractors), such as tight timeframes, unrealistic contracts and low pay.<sup>3</sup> Overloading is also a factor.

The proposed interventions to improve safety outcomes have predominately been aimed at the worker level (i.e. towards individuals and their behaviours). Yet it is industry and business factors that create or influence the level of risk.<sup>4</sup>

Whilst the GPS focusses on driver behaviour, the MOT suggests that there are three intervention indicators:

- *“progress around private sector initiatives to establish best practice road safety standards in the supply chain.”*
- *“progress around the review of log book and work-time requirements as part of the 2019/2020 rules programme”.*
- *“incorporate journey purpose into the Crash Analysis System (CAS).”*

The GPS should place a greater emphasis on the supply chain and their influence on driver behaviour.

### **Maori Strategy**

We welcome the mention of the Crown’s commitment to the Maori-Crown partnership, but are concerned that the GPS does not expand on how it intends to implement this Crown commitment.

### **Union engagement**

The aim of the GPS is to improve well-being and liveability. Yet the GPS excludes those that work within that system from taking any part in the decision making. If the GPS is going to be a more than a document that gathers dust, it must acknowledge the role of the workers and their representatives. Without the workers, there is no transport system.

s 9(2)(a)

Wayne Butson  
General Secretary  
**Rail & Maritime Transport Union.**

<sup>3</sup> Mooren, L., Grzebieta, R., Williamson, A., Olivier, J., & Friswell, R. (2014). Safety management for heavy vehicle transport: A review of the literature. *Safety Science*, 62, 79-89.

<sup>4</sup> Thornthwaite, L., & O’Neill, S. (2017). Regulating the health and safety of road freight transport drivers in Australia. Sydney: Transport, Education, Audit, Compliance, Health Organisation (TEACHO) Ltd.



11 May, 2020

NZ Automobile Association submission on:  
**Government Policy Statement on  
Land Transport 2021/22-30/31**

RELEASED UNDER THE  
OFFICIAL INFORMATION ACT 1982



**SUBMISSION TO:** NZ Ministry of Transport  
**REGARDING:** Government Policy Statement on Land Transport 2021  
**DATE:** 11 May 2020

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## Executive Summary

The New Zealand Automobile Association (AA) welcomes the opportunity to provide comment on the Government Policy Statement on Land Transport 2021/22-30/31 (GPS 2021).

We have focussed our submission on what we consider to be critical strategic issues, rather than attempt to comment on every aspect of GPS 2021, including:

- Clarity about what the Government is committing to deliver, as allocations exceed revenue by over \$1B in 21-24, which has not been the case previously. As a consequence, GPS 2021 creates some major questions about how trade-offs will be made and/or what other funding may be required. These are questions we expect a GPS to answer, not pose. In the case of the new Road to Zero activity class the changes from the previous approach to road safety (i.e. mix and level of road safety activities) are not readily apparent.
- The addition of major non-road capital expenditure into the National Land Transport Programme has diluted the focus on value for money and transparency, led to multiple funding sources and decision making processes for land transport, and ongoing uncertainty about transport investments. It makes it more difficult to follow how much road users are paying and what services are being delivered.
- The focus on road safety in GPS 2021 risks becoming misleading in some regards, omitting discussion of some major road safety determinants (road infrastructure, and surface maintenance) while presenting other investments as road safety investments (for example subsidies to fund the national rail network), without due context or caveat.
- We are opposed to motorists subsidising the national rail network, as the opportunity cost is direct road safety investment. There also has not been a clear case presented that this investment delivers value for money. This investment should be subject to a full assessment through the budget process.
- We support investments aimed at mode shift where these provide demonstrable transport benefits, made through a transparent and balanced assessment process that chooses the best mode for the task.

We support no further increases to Fuel Excise Duty (FED) and Road User Charges (RUC) for 2021-24, given the 18% increase to these taxes in GPS 2018. In Auckland there is a regional fuel tax on top of these increases.

Given the uncertainty about what might result from the recently established Infrastructure Industry Reference Group, we have commented on the GPS as it is, without second guessing what investment might arise from their work.

We note there is likely to be change to GPS 2021 because of the impacts of COVID-19, and expect reasonable efforts at further consultation.

We are very happy to meet with officials to discuss our feedback in more detail.

## Part 1: Key Issues

### 1a. Link between what is announced in the GPS, what is planned, and information about what is delivered.

#### Total allocations exceed the expenditure target for 2021-24

Total revenue is up by \$1.1B to \$13.7B for 2021-24, as FED and RUC increases in GPS 2018 come fully on stream. However, allocations (based on the sum of the midpoints for each activity class) in GPS 2021 for 2021-24 exceed the expenditure target by around \$1.3B, which has not been the case in previous GPS<sup>1</sup>.

GPS 2021 therefore announces midpoint allocations for activity classes (most increased) that National Land Transport Fund revenue is not expected to be able to fund, without acknowledging this discrepancy. Subsequent versions need to clarify how shortfalls will be addressed, including how trade-offs will be made between investments in different activities, and whether other funding options will be used. Absent this information, it is unclear what GPS 2021 is announcing and what will actually be delivered.

#### Signalling differences from one GPS to the next

The AA would like to take this opportunity to stress the importance that the GPS signals changes from one document to the next. The Ministry of Transport transitions guide was helpful to some degree. However, GPS 2021 does not clearly present some basic information, for example:

- the change to overall allocations for road and for non-road activities
- what activities received more or less allocated funding (including the approximate change)
- how the additional FED and RUC revenue (hereafter referred to as road user revenue) is allocated
- funding for safety activities, and how much is additional compared to 2018-21.

This sort of information would help the public to understand the implications of the proposals and priorities in GPS 2021 and engage in the consultation process.

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<sup>1</sup> In GPS 2018 for 2018-21 the expenditure target was \$12.6B and allocations (based on the midpoint for activity classes) was \$12.7B.



## New Road to Zero activity class and strategy

We support the establishment of the Road to Zero activity class to co-ordinate planning and delivery of road safety interventions. As part of the transition to this new activity class, we call for greatly improved transparency and accountability surrounding safety spending. In our experience, delivery of safety work and reporting of progress under the Safe Network Programme (SNP) has not always been clear, and delivery is currently significantly below expectations. For example, the SNP planned 198km of median barriers but only 18km have been completed to date. The latest quarterly update from NZTA states that “the speed management and infrastructure programmes (projects worth more than \$1m) are well behind the delivery rate required.”

We support the Road to Zero target of a 40% reduction in deaths and serious injuries by 2030. We are unable to tell with confidence whether the signalled actions and funding allocations (assuming investments are made at the allocated level) will be delivered, or be sufficient to achieve the target. Detail on the additional interventions, and increased levels of interventions, necessary to decrease deaths and serious injuries to achieve the target have not been provided in the Road to Zero strategy or GPS 2021. Official modelling about the interventions required to meet the target has not been released publicly. The increase in spending (over the next three years and over the full ten year period) seems modest in comparison to the target<sup>2</sup>. Additionally, GPS 2021 quotes large figures without context, which further confuses the picture. For example, a “\$1.2 billion additional investment in local roads” as part of Road to Zero appears to be largely redirected funding from local road improvements, and the disestablished regional improvements activity class, already earmarked for safety. This is unclear and the use of the term “additional” may be inaccurate.

### What we’re hearing

AA Whanganui District – “given the GPS is a ‘policy’ statement we would suggest it should have more ‘policy’ related targets to support its funding. After all it does set levels of permitted spending. Therefore, it would be good to see some slightly lower level statements such as for example it might relate to maintenance renewals, rehabilitation etc at say minimum % of the (neglected) network per annum. Such a statement would allow a dollar amount to fall out. It seems to be back to front in too many areas. By setting levels of direction, the policy becomes more performance (outcome) based.”

## 1b. State of the land transport funding system

More uses of road user revenue, and mixed funding streams and decision making processes, have created uncertainty and leave the land transport system collectively without a clear long term strategy.

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<sup>2</sup> Nominal total increase in allocated safety spending (road police, safety treatments, advertising and education, equipment such as red light cameras and roadside drug testing) appears to be about 17%.

## Taxing Kiwi motorists

Set up in 2008, the hypothecated approach to land transport funding (and the justification for taxing motorists) is based on the principles that<sup>3</sup>:

- the level of road use generates funding proportionate to demand: when there is more use of the roads there is more money to develop, maintain and manage them
- revenue is spent as it comes in: there is a pipeline of projects that benefit motorists, and resources can be moved between different investments if there is a delay in one area.

Part of this system from the beginning was that road user revenue would subsidise public transport fares to a reasonable level, as public transport benefited motorists if it reduced congestion, and this funding could be planned for and delivered without compromising the principles above – referred to by the Ministry of Transport as “the social contract”.

## Road user revenue for major non-road capital projects

GPS 2018 introduced the use of road user revenue to fund rail capital and rapid transit infrastructure but implementing this change has proven more challenging than was envisaged. GPS 2021 proposes even more funding for these purposes, including incorporating the Rail Plan into the National Land Transport Programme.

In 2018/19 actual National Land Transport Fund spending was substantially under budget (by 7%). Most of the under-spend was in activity classes relating to rapid transit, rail and public transport infrastructure. This meant the increases to FED and RUC provided additional revenue that was not spent. Fuel taxes should not be increased as a means of raising and saving money to deliver projects in the longer term – raising transport taxes in advance of needing the revenue is inconsistent with the pay-as-you-go principle of the land transport funding system.

In addition, GPS 2018 reduced funding for state highway improvements by \$5.2B over 10 years to fund these new uses, meaning projects Waka Kotahi NZ Transport Agency (the Agency) previously assessed of high value for communities and New Zealanders all around the country stopped<sup>4</sup>. The NZ Upgrade Programme (NZUP) has largely replaced this funding with \$5.3B for road projects, which we support. However, this approach has:

- delayed shovel ready projects
- decreased infrastructure capacity - we compete in a global market for capital and when improvements allocations were dialled down, capital and skills moved offshore, and are not immediately available again, which further delays these shovel ready projects.

The impacts include increased costs for projects. This experience demonstrates the complexities of combining the planning, management and delivery of different types of (large scale) investments within a

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<sup>3</sup> Based on findings of Ministry of Transport’s Future Funding Project: <https://www.transport.govt.nz/multi-modal/keystrategiesandplans/strategic-policy-programme/future-funding/>

<sup>4</sup> From the 17/18 allocation level.

funding stream established to accommodate one type of investment, as well as the difficulties effectively moving funding between these investments.

### **The current situation and an ongoing issue**

The NZUP rebalanced funding in the short term. Now GPS 2021 further decreases state highway funding (by \$1.25B over ten years compared to GPS 2018) and local road funding (down \$1.7B), falling away by greater amounts in later years.

As the NZUP drops off in four to five years so does GPS funding. In the last five years of GPS 2021 funding allocated to improvements (state highways and local roads combined) averages \$593m p.a. To provide context, in 2018/19 \$1.6B was allocated to improvements. Road user revenue in each of the last five years of GPS 2021 is projected to be over \$1B higher than it was in 18/19.

This situation contributes to uncertainty in the transport sector – including the construction sector who build transport infrastructure – and impacts capacity to deliver transport investments. It also potentially disrupts the Regional Land Transport Planning process. Value for money is reduced, and some communities are left without clear plans.

### **There are better ways to do this**

We support capital investment in metro rail and rapid transit, as important parts of the transport system, and these investments need to be planned and co-ordinated with road investments. However, these investments need separate funding sources and delivery processes<sup>5</sup>.

Given the Government is clear that the benefits (including “making streets more inviting places”, recreation and community connectedness, land use) of these capital investments will accrue to the nation’s health, economy, society and environment, the funding required to achieve this should come from the Crown, as well as those using these services.

Furthermore, investment in high density corridors will increase the value of properties close to these services. We support targeted funding whereby those who directly and significantly benefit from a project meet more of the cost (a levy on developers, or targeted rates on home owners), alongside local government funding and financing. We would like to see significant policy emerge on these other funding sources.

Given delays to Auckland light rail, and with Let’s Get Wellington Moving (LGWM) in its early stages, we have an opportunity to repair “the social contract”. In the case of the LGWM programme, we note over 80% of investments are non-road investments.

## **1c. State of the network and its effect on safety**

GPS 2021 does not address the base condition of the road network and how this innately influences safety.

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<sup>5</sup> Multi-year budget appropriations are well suited; and the impact of planning uncertainties would be mitigated with funding allocated from a much bigger pool.

Road safety is, and always has been, the cornerstone of the AA's advocacy work. While we have strongly supported the Government's road safety work, we have repeatedly raised concerns about the availability of funding.

Nearly 40% of New Zealand's state highway network has a 2-star KiwiRAP<sup>6</sup> safety rating. 2 star roads have deficiencies such as roadside hazards, poorly designed intersections, a lack of safe passing opportunities and narrow lanes. According to KiwiRAP, a third of all the driving on state highways takes place on 2-star roads. Upgrading these roads from 2-star to 3-star quality (where the deficiencies in the features of the road are far fewer), would effectively halve the trauma from crashes, but requires an upgrade programme at the necessary scale. The SNP, based on current levels of funding and delivery, has made little progress upgrading them. GPS 2021 presents no major plan to address this, initially increasing safety treatments spending as part of Road to Zero by around 17% (by \$65m p.a. in 2021-24), but this is not proportionate to the current condition of the network and the scale and types of work required. The moderate increase in Road to Zero over the full 10 years is eclipsed by the significant reductions in state highway and local roads improvements which are a major determinant of the network's safety.

### **Road maintenance and road building are road safety issues**

The AA is concerned that the fundamental influence investments in new roads and road maintenance have on the road toll is not covered in GPS 2021:

- New roads are safe roads - how safe a road is depends to an extent on whether built-in safety features have been incorporated into the roads design (straight, divided, good line-markings, wide lanes and sealed shoulders, few roadside hazards and intersections). For this reason, there are much lower crash rates on the completed new highways around New Zealand.
- Maintained roads are safe roads - road surface quality determines the grip a vehicle has with the road and its risk of skidding. Poor quality roads increase crash rates, especially loss of control crashes where vehicles cross the centre line or run off the road.

Retrofitting existing highways with engineering treatments will produce safety gains. However, new roads built to modern engineering and safety standards will achieve greater safety gains in both preventing crashes and also decreasing their severity. Good quality road surfaces can play a big role in reducing crashes across the entire network.

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<sup>6</sup> The New Zealand Road Assessment Programme KiwiRAP is a partnership between the AA, the Agency, NZ Police, Ministry of Transport and Accident Compensation Corporation.

### What we're hearing

We have been approached by Members, including people working in the transport industry, asking why these investments are not included. An example of a recent question:

"The document [Road to Zero] has 5 focus areas with the first being Infrastructure. It talks about investing more in safety infrastructure and other items however I cannot see where it looks to improve the pavement surface."

### Maintenance allocation and the backlog

We support the 17.5% increase in maintenance funding allocation in GPS 2021, but it is insufficient given that over most of the last decade nominal maintenance funding 'flat lined' while:

- Costs - labour, plant, materials - rose 17% between 2009/10 and 2018/19
- Use - vehicle kilometres travelled - increased 22% and freight volumes grew by 32% (road surfaces are consumed by use).

During this time the Agency has been unable to meet the targets it sets for the level of work required to maintain a safe network. The Agency's state highway maintenance targets are 9% resurfacing and 2% foundation replacements for the network p.a.

From 14/15 to 18/19 the level of resurfacing was below target every year, and total work over the period 33% below target. At a select committee in December 2019, The Agency advised:

"We've got our biggest maintenance renewal program for the last 10 years happening this summer, So it's about a 9 percent investment across the network. We've been running at about 4 or 5 [percent]."

This was a projection that the Agency planned to do approximately enough work to meet its target in 2019/20.

For foundation renewals, in 9 out of the 10 years between 08/09 and 18/19 the level of work completed was below the target, and the total work completed 50% below target. In 18/19, a quarter of the targeted level of foundation work was completed (even after GPS 2018 had increased funding).

The level of maintenance work is consistently below target, and we have an unprecedented backlog of maintenance work that is vital to road safety.

On the state highway network, therefore, the AA is calling for a national maintenance programme that results in 12% of the network's road surfaces being renewed each year and 3% of foundations redone. For the first three years of GPS 2021 we need to increase state highway maintenance funding \$240m p.a.

For local roads we need to double the increase in maintenance funding proposed in GPS 2021 for the first three years from \$70m p.a. to \$140m p.a.

## What we're hearing

In the AA Members Concerns Surveys, the top concern (out of 46 polled) for the last three years has been 'road surface quality' (a concern for 67% of Members in Feb. 2020).

**AA Hawkes Bay / Gisborne District** - "it is apparent that the condition of highways and local roads in our region has deteriorated and is not being maintained to a standard that provides a safe driving environment."

**AA Manawatu District** – "the increased focus on maintenance [in GPS 2021] is supported but the increase should be even larger as there is a mountain of deferred maintenance to catch up on to restore the network..."

## Reductions to state highway and local road funding for improvements

Our road network is a critical part of our overall transport system.

83.5% of trips are taken in private vehicles, and total vehicle kilometres travelled is projected to continue to increase (as reflected in the growth in road user revenue projected in GPS 2021).

The national freight demand study found total freight moved in 2017 was about 260 million tonnes, and forecast to grow to 354 million tonnes by 2037. About 7% of freight is currently moved by rail. Hypothetically, if rail tripled its share of freight by 2037 there would still be 20 million more tonnes handled by trucks; 8% more than moved by trucks currently.

Reductions in allocations to state highway and local road improvements, if not redressed, will negatively impact safety, prosperity, and wellbeing across communities. As covered in section 1b. of this submission, the NZUP replaces reductions made in GPS 2018, but GPS 2021 makes significant further cuts.

Our view is that at a minimum investment in state highway and local road improvements should be restored to the level in GPS 2018, which would see the majority of the additional road user revenue invested in activities with direct road safety benefits. FED will be over 70c per litre of petrol (and RUC an equivalent amount) when GPS 2021 comes into effect.

### What we're hearing

'Better road maintenance and improvement' and 'Safer road engineering' are the two top issues that our Members wanted more Government investment in when surveyed in early 2020.

AA Northland District – "SH 1 is our main artery to the rest of the country and is the key to regional development. It needs upgrading." And "Both SHs and LRs in Northland are needing funding increases."

AA Hawkes Bay / Gisborne District – "There are a number of projects identified that have been on the regional transport programs for years but not progressed."

### Regional and rural New Zealand

We are concerned about the lack of dedicated funding for rural and regional areas, given:

- reductions to state highways and regional improvements which disproportionately impact rural and regional communities, and regional economic development
- the Agency's pavement tracking data shows rural areas appear to have been disproportionately impacted by the prolonged and ongoing maintenance funding shortfall
- an increasing percentage of road user revenue is spent in the biggest cities: over 90% of public transport spending goes to three cities; and in the first three years of GPS 2021 40% of new revenue goes to public transport related activities
- the disestablishment of the 'regional improvements' activity class (funding dedicated for non-metropolitan areas).

NZ has 83,000km of local roads. We are calling for more allocation to local roads, and the re-establishment of the regional improvements activity class and allocation. As well as guiding allocations to rural roads, the regional improvements activity class provides for more transparency for rural and regional communities.

### What we're hearing

AA Wairarapa District – We have our perennial projects that we have been promoting for ages which seem to get side lined with each new approach - but we must, and we will, continue to keep pushing for them.

AA Southland District – "Funding of walking and cycling is fine but with the nature of our district, based around spread out rural communities, we need to accept that walking and cycling will not replace private vehicles as the main mode of travel for most people, so should not be placing an 'over emphasis' on spending on walking and cycling which are largely 'recreational' in our area."

AA South Canterbury District – "Potentially could bring forward some of the smaller capital projects during the recession when less trucks on the road..."

We also suggest the Agency reviews the Funding Assistance Rate (FAR), specifically focusing on whether the FAR can reasonably be increased in some circumstances (that it is not currently) for local road improvements and local road maintenance to address potential underinvestment outside the main centres.

### Comment on 'Safety' indicators:

- Need to monitor road safety outcomes and adjust investments (levels and activities) early in the decade, if we are not on track to meet the Road to Zero target. A major review of the plan, involving stakeholders, should be completed before 2023
- The proposed indicator relating to speed management is ambiguous about the balance between decreasing speed limits and engineering solutions
- Add an indicator for road surface quality (must be suitable and meaningful)
- Review 'key performance indicators' approach in Network Outcomes Contracts to get value for money from maintenance spending
- Add indicator based on KiwiRap ratings and driver exposure to risk.

## 1d. National rail network

### Shifting freight to rail

Coastal shipping, rail and road transport all have roles to play in freight movement. However, the nature of freight movements around New Zealand heavily determine mode share.

Heavy trucks provide specialised services. For example, it is not viable for trains to replace concrete agitator trucks. In the case of forestry, dispersed plantations limit the use of rail. While livestock trucks, fertiliser trucks, fuel tankers, milk tankers and many other trucks operate away from railway lines. Additionally, there are trucks that take supplies to rural centres away from railway lines.

Only 19% of freight is general freight and when distance is taken into account, 8% of the annual tonne/km moved is general freight. General freight refers to cargo that does not require the use of specialised equipment to transport it (e.g. pallets of construction materials, or non-perishable food), which could potentially be moved by rail. Rail becomes economic over longer distances, and is generally best suited for freight that is not time critical. As the 'first and/or last leg' for most freight is by truck, it is often not viable to "double handle" it and put it on rail given the short distances freight travels over land in New Zealand. The biggest proportion of freight, 29%, is manufactured and retail goods, and this is followed closely by logs and dairy<sup>7</sup>.

The potential for significant mode shift is constrained. We are highly unlikely to double the rail share of the freight task. Robust information about the realistic potential to shift road freight to rail, and the likely magnitude of associated benefits, needs to be provided.

### Appropriate use of road user revenue

In GPS 2021 the positioning of investment in the national rail network as a road safety investment is, in our view, misleading, without adequate context provided. Modelling for Road to Zero shows that to decrease deaths and serious injuries by 50% (rather than 40%) requires additional investment of \$2B over the next 10

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<sup>7</sup> John Addison, NZ Herald, 2018.



years. GPS 2021 proposes a \$1.1B investment in the national rail network (an activity motorists have not previously funded). If this road user revenue proposed for the national rail network was used to fund Road to Zero, the safety benefit would be significant. The \$1.1B subsidy to KiwiRail would likely have a net negative impact on safety, if it comes at the expense of more direct road safety investments. We are also concerned that some of the other benefits associated with this proposed allocation are similarly being considered out of context.

Given the opportunity cost to motorists, the national rail network should be funded by the Crown, as well as those using these services. We strongly oppose this use of road user revenue and its opportunity cost. This proposed investment should be subject to full and robust scrutiny through the Budget process.

### What we're hearing

AA Wellington District – “Definitely not. We do not think funds from motorists and truck companies should be used to subsidise rail freight or coastal shipping. KiwiRail is already subsidised from the consolidated fund i.e. general taxation.”

AA Nelson District – “Generally, no. As there is no rail network in our region, there is no benefit to Nelson/Tasman, however there may be some national benefit if more freight could be diverted from roads, however as pointed out in the circular, the economics must stack up, rather than ploughing money into subsidising unviable alternatives.”

AA Waikato District – “We do not agree with Road User Revenue being used for these two activities, Rail is being and always has been subsidised by the Government. Rail should start being more efficient and be made to operate without more help and subsidies.”

### Comment on 'improving freight connections' indicators:

- 'Mode share for freight' indicator does not allow choice of best mode or capture value for money. This gives rise to concerns about the rigour of analysis up to this point, and the criteria and magnitude of the benefits upon which this investment is proposed
- Expected and measured efficiency of movement of people and goods should be added
- We support travel time predictability and network availability as indicators.

## 1e. 'Better travel options' and 'Climate change' strategic priorities

### Overlapping priorities

The 'climate change' and 'better travel option' priorities appear to overlap, essentially the former specifying the problem and the latter prescribing the solution. We suggest this creates a risk of double counting in the Agency's investment assessment framework.

## Mode shift

The principle of 'mode neutrality' has receded in GPS 2021 with a stronger focus on achieving mode shift, moving people to public transport and active modes for environmental, congestion, public health, and safety benefits.

While we support investments aimed at mode shift where these provide demonstrable transport benefits, investments into public transport and active modes cannot be an end in themselves, as these modes will not always "improve people's ability to get places" and be "fit for purpose transport for the future". We support an approach that chooses the best mode for the task at hand. That needs to be achieved through a transparent and balanced assessment process.

Mode shift plans must be realistic about the potential for change, transparent, and deliver value for money. Plans need to be based on actual level of desire (not just the stated level of desire) to change modes, and an understanding of why people choose to live and travel the way they do.

One important consideration not well captured in GPS 2021 is people's different circumstances, and what they need from the transport system. For example, private vehicles are indispensable for many people due to health reasons or family commitments.

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### What we're hearing:

Our Members support increasing road user subsidies for public transport and 55% rate improving public transport as extremely important. Members are pleased by promises to improve public transport, but qualify their support is conditional on new public transport investment not being at the expense of roading.

For 90% of AA Members not being able to use a car would be a problem. Members use a car to carry more (93%), they are quicker (80%), more convenient (78%), more reliable (68%), and cheaper (27%). Members say they use a car a lot of the time to – run errands (66%), for work (50%), carry things (48%), and carry other people (34%).

**AA Taranaki District** – “In regional centres like New Plymouth a paradigm shift away from reliance on cars will require convenient frequency of services and routes plus incentives like free or low-cost trips for low patronage routes.”

**AA Wellington District** – “Generally the funding [in Wellington] is put to good use but note that some new routes hardly have any passengers currently and GWRC propose to wait up to 2 years to assess if the route is viable. Also, small feeder buses in hill suburbs are cheaper and quicker than large buses currently used. Further investment in PT is a key component of the Let's Get Welly Moving programme and significant funding is needed for this programme.”

**AA Waikato District** – “spending on PT in Hamilton and wider Waikato District is deemed a good use of funding...”

### Allow for innovation

GPS 2021 is too prescriptive regarding transport solutions, and we suggest reinstating 'value for money' (a strategic priority in GPS 2018) as a strategic priority to counterbalance this. Our transport system is constantly changing. Transport policies need to plan for and accept some uncertainty when considering the future of travel. This will enhance our ability to adopt and benefit from rapid advances in transport technology.

Our transport system has seen many exciting developments in the last ten years:

- ridesharing services providing us with new options for getting around
- the increased uptake of electric vehicles and the roll-out of new charging infrastructure
- the rise of semi-autonomous vehicles
- a growing nationwide cycle network with expanding usage.

GPS 2021 needs a stronger focus on technology and innovation to deliver an efficient, affordable and safe transport system with less environmental externalities. For this reason, we call for more investment in alternative fuels (e.g. biofuel), demand management, shared mobility, mobility as a service, low or no emissions vehicles, and research and innovation generally.

Buses, private vehicles, walking, trains and bicycles, are all part of our collective past and our collective future. We must improve the services they provide and reduced the harms they cause. We may also come up with entirely new ways of moving. This is a work in progress. GPS 2021 must be an enabler for this journey.

### Comment on 'better travel options' and 'climate change' indicators:

- 'Better travel options' Indicators do not cover value for money which is concerning given there are limited resources with which to address problems and achieve objectives. For example, NZ has a small tax payer base for its geographic area, which places limits on where effective public transport services can be provided at a manageable cost.
- We support the 'climate change' priority indicators.

## Part Two: Comments on Road to Zero and Climate change investments

### 2a. Road to Zero safety investments

The AA strongly supports the Government's commitment to safety as a priority.

#### What we're hearing:

When we asked AA Members to rate five safety issues as little, moderate or big problems: 71% rated drivers on phones to be a big problem, compared to 61% for drunk drivers, 58% for drugged drivers, 52% for speeding drivers and 38% for tired drivers.

Surveys of our Members show 95% support introducing roadside drug testing; over 90% support alcohol addicts only being allowed to drive vehicles with an alcohol interlock; and over 80% support more red light cameras.

AA Marlborough District – "We support more road policing - have noticed over the last 2+ years that there has been a drop in road policing. There are no booze bus stops and there's a general lack of police presence on our highway network."

#### Infrastructure safety treatments

The focus on infrastructure safety treatments on high risk roads is vitally important. We have long advocated for proven road safety treatments like median and roadside barriers to reduce deaths and serious injuries. To get the best possible safety return, safety retro-fits like barriers must be accompanied by physical works to provide passing lanes, wider shoulders, and a greater number of safe turning opportunities as this helps overcome community opposition to installation.

#### Road police

GPS 2021 proposes "maintaining current levels of road policing" for 2021-24. An increased level of road policing is likely to assist toward achieving road safety targets, especially if targeted to times, locations and drivers identified to be at risk. We support the additional funding for roadside drug testing, and testing equipment.

## Alcohol interlocks

We consider alcohol interlocks an underused sentencing option. We support the use of road user revenue to cover interlock costs for offenders that cannot otherwise afford one.

## Speed management

We support the investments focused on speed management but these must be based around both reducing speed limits and engineering improvements. To date, the vast majority of speed management projects have been speed limit reductions. We are not aware of any significant project where Mega Maps recommends “engineering up” that has been implemented. Engineering work can make roads inherently safer: where there are speed-related risks but also a need to maintain the current speed limit (such as on high-volume roads designed for throughput); and so that road environments signal the safe speed. Funding constraints mean much needed engineering work (identified by the Agency’s Mega Maps tool) has fallen out of the National Land Transport Programme.

The AA has strongly endorsed the Government’s recent announcement to reduce speed limits around schools. To support this initiative, we propose: electronic speed signs outside all schools; and a programme to construct new drop-off points for buses and cars – located off the main road – at rural schools. Rural schools are where the risks associated with speed are greatest.

We support the deployment of red light cameras under the Tackling Unsafe Speeds initiative as an affordable and effective way of reducing injuries and deaths associated with red light running. Outside Auckland, only one red light camera is in operation – in Wellington.

## 2b. Climate change

The AA supports the objective of a transition to a low carbon transport system. We are concerned about the environment, and our Members are too.

### What we’re hearing:

Two-thirds of AA Members tell us they have made changes to their travel in recent years for environmental reasons; when asked to place a monetary value on the level of expense they are able to incur to curb emissions the average amount is \$30 per month.

In our Elections Issues Survey Members identified replacing some trips with public transport as the most popular way they intend to reduce their carbon footprint.

**AA Hawkes Bay / Gisborne District** – “we have noticed a few more improvements to walking and cycling in our districts, however the improvements have encouraged and attracted more recreational cyclists than commuter cyclists.”

**AA Wellington District** – “With the introduction of e-bikes there has been a significant increase in both bikes and e-bikes in Wellington.”

We most strongly support policy initiatives aimed at encouraging people to make better travel choices. For example, providing New Zealanders with greater transparency about all the costs of different modes (e.g. economic, environment, safety, and other externalities) in order for them to make fully-informed decisions.

Under the Emissions Trading Scheme a levy of 8 cents per litre (plus GST) is charged on every litre of petrol sold in New Zealand.

### **Uptake of low emissions vehicles and fuel efficiency information**

The AA supports encouraging the uptake of lower emission vehicles, including electric vehicles, as a means of reducing the environmental footprint of the land transport system.

Should the uptake of low-emission vehicles increase substantially, we note that there will inevitably be a shortfall in road user revenue going into the National Land Transport Fund which will need to be addressed, due to declining fuel excise and the (currently temporary) road user charge exemption for electric vehicles.

We also support the ongoing provision of information on vehicle fuel efficiency (through EECA's fuel economy labelling programme), and educating consumers on the operating costs of different vehicles, to help them make informed choices.

### **Alternative fuels**

Biodiesel offers a significant opportunity to reduce internal combustion engine emissions. However, the current regulatory regime incentivises bioethanol over biodiesel through an exemption on fuel excise, which should be addressed. Biofuels are one potential solution to the emissions of our relatively small heavy-vehicle fleet which currently consume significant quantities of fuel, as well as for light-passenger vehicles.

Additionally, there is scope to explore synthetic fuels for both petrol and diesel engines. There is a need for New Zealand to invest in more research and development to transition to a low-emissions economy, including a broader look at enabling alternative low-emission fuels.

### **Conclusion**

We are very happy to meet with officials to discuss our feedback in more detail.

Given the uncertainty about what might result from the recently established Infrastructure Industry Reference Group, we have commented on the GPS as it is, without guessing what investment might arise from their work.

We note there is likely to be change to GPS 2021, and expect reasonable efforts at further consultation.

## About the New Zealand Automobile Association

The NZAA is an incorporated society with over 1.7 million Members, representing a large proportion of New Zealand road users. The AA was founded in 1903 as an automobile users' advocacy group, but today our work reflects the wide range of interests of our large membership, many of whom are cyclists and public transport users as well as private motorists.

Across New Zealand, the motoring public regularly come into contact with the AA through our breakdown officers, 37 AA Centres and other AA businesses. Seventeen volunteer AA District Councils around New Zealand meet each month to discuss local transport issues. Based in Wellington and Auckland our professional policy and research team regularly surveys our Members on transport issues and Members frequently contact us unsolicited to share their views. Via the AA Research Foundation, we commission original research into current issues in transport and mobility. Collectively, these networks, combined with our professional resource, help to guide our advocacy work and enable the NZAA to develop a comprehensive view on mobility issues.

Motorists pay over \$4 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. Much of this money is reinvested by the Government in our transport system, funding road building and maintenance, public transport services, road safety work including advertising, and Police enforcement activity. On behalf of AA Members, we advocate for sound and transparent use of this money in ways that improve transport networks, enhance safety and keep costs fair and reasonable.

Our advocacy takes the form of meetings with local and central government politicians and officials, publication of research and policy papers, contributing to media on topical issues, and submissions to select committees and local government hearings.

<b>Total Membership</b>	1.7+ million members
	Just over 1 million are personal members
	0.7 million are business-based memberships

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<b>% of licenced drivers</b>	Half of licenced drivers are AA Members
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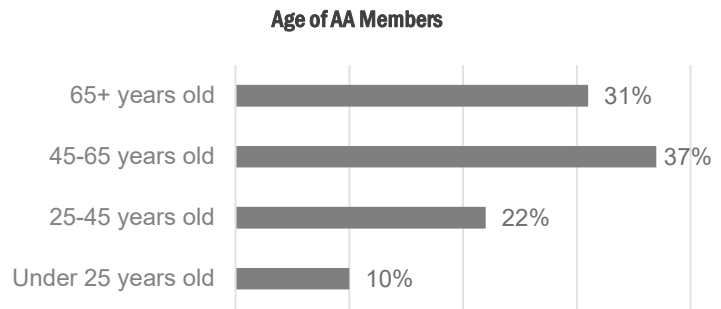
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<b>Gender split</b>	54% Female
	46% Male

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**Age range & Membership retention**



Half of AA Members have been with us for 10 years or more.

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**MOTOR INDUSTRY  
ASSOCIATION**  
INCORPORATED

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New Zealand

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W: [www.mia.org.nz](http://www.mia.org.nz)

15 May 2020

Ministry of Transport  
P O Box 3175  
Wellington 6140

via email: [gps@transport.govt.nz](mailto:gps@transport.govt.nz)

### **Government Policy Statement on Land Transport 2021**

The Motor Industry Association (MIA) is a voluntary trade association set up to represent the interests of the new vehicle industry specifically the official representatives of overseas vehicle manufacturers. Members account for over 98% of all new vehicles imported and sold in New Zealand across the passenger car, light and heavy commercial vehicle and motorcycle including on and off road (i.e. ATV etc) sectors.

The Association has over 43 members (official distributors appointed by vehicle manufacturers) covering 75 different marques (brands).

#### **NZ Automobile Association**

The MIA wishes to acknowledge and support the submission by NZ Automobile Association (NZAA) on the Government Policy Statement on Land Transport 2021.

In particular, the MIA supports the views of NZAA where its submission challenges the robustness of the evaluation relating to road safety, road funding and its use for rail and shipping as an alternative to road use.

In supporting the submission, the MIA wishes to make the following points.

#### **Road safety**

The MIA supports the establishment of the Road to Zero activity class to co-ordinate planning and delivery of road safety interventions is a good move. However, this needs to be supported with clear expectations. Over the past few years, governments have dropped the ball on road safety that needs to be put right if we are to reach the Road to Zero target of a 40% reduction in deaths and serious injuries by 2030.

While the GPS indicates and small increase in road safety spend, it is equally important that the Police spend is fully allocated and transparent to deliver the Road to Zero target.

#### **Road funding**

The GPS is primarily funded through direct road user taxes. However, motorists are being asked to pay more and more taxes and yet the amount of funding being directed to non-road activities continues to increase.

The MIA supports mode shift where there is a demonstrable transport benefit for all road users. Using road user funding to support long distance rail and coastal shipping without clear indication of value of the benefits, if any, is based on a false premise.

Roads will continue to be the primary means of access for most of our travel needs for many years to come. Even as we move away from petrol and diesel vehicles to electric, etc, they will still be dependent on an efficient and safety road network.

#### Public transport

The MIA supports capital investment in metro rail and rapid transit, as important parts of the transport system but these investments need separate funding sources and delivery processes. A significant amount of funds is being directed to Auckland metro, which will be good for the region but will do nothing for road users nationally.

#### Regional focus

The MIA supports regional and rural road funding. This is another area that governments have ignored for too long. The current Government attempted to support regional roads with a token funding allocation, but this needs more deliberate and appropriate long-term funding level allocation.

#### Climate change

As mentioned, the MIA supports modal shift. However, as roads will continue to be the primary means of people moving around the country, the Government needs to compliment this by implementing a clear policy to accelerate the uptake of plugin vehicles throughout the Government fleet.

#### COVID-19

The MIA notes that COVID-19 will have a long-term impact and likely to lead to further changes to the GPS and would expect those changes to follow normal transparent consultation processes.

#### MIA summary comment

The MIA supports measures that lead to safer and more efficient roads. The MIA suggests that proposed GPS reinforces the view that Government objectives are unclear and many of those objectives are driven by ideals rather than sound research and supporting cost benefit analysis.

Kind regards

s 9(2)(a)

Leo S Mortimer  
Principal Technical Adviser

David Crawford  
Chief Executive Officer

Candor3 Submission<sup>1</sup>

Question	Answer
Who are you submitting on behalf of?	Candor3
What is the postcode of where you live (or where the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder	1051
Do you agree these should be the strategic priorities for investment in land transport?	
Safety	Yes
Better travel options	Yes
Improving freight connections	Yes
Climate change	Yes
Do you have any comments on the strategic direction of the GPS?	Linkage to Land use planning should be made more specific - this is one of the key reasons why the the transport network in NZ is broken.
Do you understand the value for money principles in the draft GPS?	Yes
Do you have any other comments to make on the Principles for Investing?	<ol style="list-style-type: none"> <li>1. NZTA should look at how the benefits and costs for projects are calculated (the efficiency component when allocating funds). The RONS had BCRs of less than 1, which means we were just subsidising the road lobby.</li> <li>2. Prioritisation/fast tracking for high/mixed use and Transit Orientated Developments along transit corridors to encourage developers to develop them.</li> <li>3. Reconsider large road projects since targeted safety improvements (eg guard rails, wire barriers) are much more cost efficient and can be delivered in a fraction of the time without the largescale ecological impacts.</li> </ol>
Do you agree that funding to support Road to Zero activities (such as safety infrastructure, road policing, and road safety promotion) should come from a single activity class?	Yes
Do you agree that the GPS should fund maintenance and renewal of the rail freight network?	Yes

<sup>1</sup> This has been created with output from Survey Monkey, some technical information has been removed such as IP addresses and response ID.

Question	Answer
Do you agree that the GPS should fund coastal shipping?	I don't know
Considering the information above, would you support increasing or decreasing the funding levels for any activity classes. Please indicate any changes in the table below	
Road to Zero	Increase GPS allocation
Public transport services	Increase GPS allocation
Public transport infrastructure	Increase GPS allocation
Walking and cycling improvements	Increase GPS allocation
Local road improvements	Retain GPS allocation
State highway improvements	Retain GPS allocation
State highway maintenance	Retain GPS allocation
Local road maintenance	Retain GPS allocation
Investment management	Retain GPS allocation
Coastal shipping	Decrease GPS allocation
Rail network	Increase GPS allocation
Increasing fuel excise duty (and equivalent road user charges) by one cent per litre generates around \$50 million in revenue each year for the NLTF. The draft GPS does not propose an increase to fuel excise duty or road user charges for the next three years. Would you support an increase to provide more funding to invest in any of the activity classes?	Yes
Do you have any other comments on the activity classes in the draft GPS 2021?	No mention of future technologies and how to plan for them eg AVs
Do you have any other feedback on anything else in the draft GPS?	<ol style="list-style-type: none"> <li>1. Little mention about overall transport resilience - which is pertinent in the current Covid 19 pandemic.</li> <li>2. Rail between Auckland and Tauranga needs to be improved to allow for better freight connections. This reduces the number of trucks on the road (safer journeys) and lessens the impact on the structure of the road (reducing maintenance and freeing up cash for other projects)</li> <li>3. Local governments need better messaging backed up by data. Case in point was High Street footpath widening trial in Auckland where the local businesses moaned over the loss of on-street parking, but have actually seen revenue go up with the wider footpaths</li> </ol>

Question	Answer
	<p>so people can browse without getting in everyone's way</p> <p>4. Local governments need to keep their eyes on the objects of the RLTP. An example of this is a linear park that was planned to improve things for pedestrians and the PT in Auckland CBD, but was cancelled after the two universities in the CBD complained to council.</p> <p>5. The fine/enforcement structure should be updated. Currently you have to be caught doing 21+ kph over the speed limit to get a fine but there are instant fines for riding a train without paying</p>

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## NZ Heavy Haulage Association Submission<sup>1</sup>

Question	Answer
Who are you submitting on behalf of?	NZ Heavy Haulage Association
What is the postcode of where you live (or where the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder	6011
Do you agree these should be the strategic priorities for investment in land transport?	
Safety	Yes
Better travel options	
Improving freight connections	Yes
Climate change	Yes
Do you have any comments on the strategic direction of the GPS?	<p>These high level priorities are supported, but the detail of how they are implemented are where the crucial importance lies. For example, Safety is a great ideal, but the limited funding for transport would mean that there are priorities for where and to what extent that funding can extend to gaining safe roads. The adage of safety at reasonable cost is a good way to proceed, as the safest roads that would produce zero deaths would be cost prohibitive and not practical nationwide. In the case of Improving freight connections, there seems to be a commonly used phrase of being "mode-neutral" but with freight there are only three ways of transporting freight in NZ - road, rail and coastal. It is impossible to fund an improvement to freight connections, without favouring one of either of these modes, so making the freight decision less mode-neutral. Simply each type of freight mode should be considered alongside how they can work together, but also work to the strengths of each mode. Having said that, the revenue gained from the use of roads should be put back into the maintenance and development of these assets, not diverted to other modes such as rail.</p>
Do you understand the value for money principles in the draft GPS?	Yes

<sup>1</sup> This has been created with output from Survey Monkey, some technical information has been removed such as IP addresses and response ID.

Question	Answer
Do you have any other comments to make on the Principles for Investing?	
Do you agree that funding to support Road to Zero activities (such as safety infrastructure, road policing, and road safety promotion) should come from a single activity class?	
Do you agree that the GPS should fund maintenance and renewal of the rail freight network?	No
Do you agree that the GPS should fund coastal shipping?	No
Considering the information above, would you support increasing or decreasing the funding levels for any activity classes. Please indicate any changes in the table below	
Road to Zero	Retain GPS allocation
Public transport services	Retain GPS allocation
Public transport infrastructure	Retain GPS allocation
Walking and cycling improvements	Retain GPS allocation
Local road improvements	Increase GPS allocation
State highway improvements	Increase GPS allocation
State highway maintenance	Increase GPS allocation
Local road maintenance	Increase GPS allocation
Investment management	Retain GPS allocation
Coastal shipping	Retain GPS allocation
Rail network	Retain GPS allocation
Increasing fuel excise duty (and equivalent road user charges) by one cent per litre generates around \$50 million in revenue each year for the NLTF. The draft GPS does not propose an increase to fuel excise duty or road user charges for the next three years. Would you support an increase to provide more funding to invest in any of the activity classes?	Yes
Do you have any other comments on the activity classes in the draft GPS 2021?	
Do you have any other feedback on anything else in the draft GPS?	