



Registered Charity No. CC36909

27 May 2011

Chief Executive
Ministry of Transport
PO Box 3175
WELLINGTON 6140

Dear Sir

Proposed direction for the Government Policy Statement on Land Transport 2012/13 to 2021/22

Thank you for your letter of the 26 April 2011 inviting our organisation to present our views on the proposed direction of the Government Policy Statement on Land Transport 2012/13 to 2021/22 (GPS 2012). We appreciate the opportunity to present our views and for any further engagement in the development of the policy and equally in the development of a wider strategic framework.

This submission has been prepared by members of the Cycling Advocates' Network.

BACKGROUND

The Cycling Advocates' Network of NZ (CAN), the peak body of 22 local advocacy groups, is this country's national network of cycling advocates. It is a voice for all cyclists - recreational, commuter and touring. Its membership includes nearly 1500 members with more than 2000 additional 'friends' who are on an email network. CAN has an Executive group and employs several staff.

We also have a number of supporting member organisations that include local authorities, cycle retailers, cycling groups and environmental organisations. We work with central government and local authorities, on behalf of cyclists, for a better cycling environment. We have affiliated groups and individual members throughout the country and links with overseas cycling organisations.

SUBMISSION

Statement of Strategic Direction

We agree with LGNZ on the apparent lack of strategic thinking in the Engagement Document. The *New Zealand Transport Strategy 2008* set out a long-term vision for the transport sector. It identified upcoming issues that need to be addressed during the first half of this century such as climate change, volatile energy prices, an ageing population and transport affordability.

Unfortunately this strategy appears to have been disregarded. Government Policy Statements have since become the strategic direction for transport by default. The key flaw with this situation is that the Government Policy Statement is an implementation instrument, not a long-term planning document. It is limited to providing guidance over a 10 year period when a more long-term perspective is needed to assess the real implications of transport investment decisions.

The Engagement Document says that the vision for the transport sector currently is:

An effective, efficient, safe, secure, accessible and resilient transport system that supports growth in our country's economy in order to deliver greater prosperity, security and opportunities for all New Zealanders.

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The Government's vision for transport, as set out in the *New Zealand Transport Strategy 2008* is that people and freight in New Zealand have access to an affordable, integrated, safe, responsive and sustainable transport system.

The proposed new statement of strategic direction needs to include the concept of environment and sustainability as well as address the longer term issues as the stated current vision does not contain these considerations.

Direction Planned for GPS 2012

Building more state highways will do nothing to resolve problems such as rising oil prices, climate change or congestion. Research is showing that congestion is only reduced in the short term (3-4 years) by building capacity on roads. In the long term (>5 years), increasing road capacity leads to longer commutes, more cars and the same or worse congestion.

Thus we believe the government should reduce the amount of funding going into new state highways over the next 10 years to 10% to 15% (maximum) of the National Land Transport Fund.

Roads of National Significance

CAN is concerned that many of the current Roads of National Significance being built in New Zealand have very poor economic justification (e.g., Puhoi to Wellsford, Wellington Northern Corridor) and will have environmental and social impacts not accounted for. We believe that most of the possible new Roads of National Significance listed in the Government Policy Statement are likely to have even poorer economic cases and deliver a lower return on investment.

Canterbury Earthquake Recovery

We acknowledge that rebuilding the state highway and local road network following the Canterbury earthquake is important. However, we suggest that this provides the Government with an opportunity to develop a modern integrated innovative transport network rather than one that relies almost exclusively on roads.

A population that walks, uses public transport and cycles as well as drives is a more resilient one. Immediately after the earthquakes, many Christchurch people took to their bikes to get around the city. We believe that the development of model city transport system that takes an innovative approach to moving goods and people in Christchurch in a sustainable manner is the best approach for Christchurch.

If further funding is required for the recovery process, it should come from lower priority funding allocations, e.g. the expanded allocation to progressing state highway improvements. Delaying some of the RONS until their BCR is substantially greater than 1, we contend is more preferable to risking a real decline in levels of service provided by local infrastructure in addition providing funds for a sustainable transport system for Christchurch.

Impacts

These are worthy impacts; however, these appear to be objectives and are not targets (most of them are not measureable).

These objectives are generally agreed with but there is misalignment with the current vision:

- There is no reference in these objectives to accessibility or is this intended to be the same as "more transport choices, particularly for those with limited access to a car". We suggest that the concept of accessibility is wider and includes the transport disadvantaged.

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- The objectives refer to environmental effects and the vision does not.
- The vision refers to opportunities for all New Zealanders. The objectives make no reference to this concept.

CAN suggests that the GPS 2012 does not lay out the best way to achieve these objectives. We suggest:

- A secure and resilient transport network: This will be achieved by creating an integrated transport network in which different transport modes are meshed together rather than by a network dependent upon one mode – the private vehicle.
- More transport choices, particularly for those with limited access to a car. We suggest a higher proportion of the funding should go towards public transport, walking and cycling infrastructure to ensure this impact.
- Contributions to positive health outcomes: We believe the more than crash statistics should be taken into account. Significant health improvements result from vehicle journeys being placed by walking and cycling.
- The impacts should be re-labelled as objectives.
- The impacts should be better aligned with a vision that includes sustainability and the environment and should include targets.

We recommend that targets (along with the Vision and Objectives) should be in the Forward Plan for Transport.

Funding Allocations

The proposed GPS discusses a small increase of the proposed funding band for the walking and cycling activity class. We note that raising the upper limit of the funding band is unlikely to do anything to actual walking and cycling investment. Even during better economic times, the actual spending in the walking and cycling activity class consistently has hovered around the low end of the funding band.

The document states a desire to improve walking and cycling yet the initiatives to do so are limited and the desire is not reflected in the budget. Walking and cycling are allocated <1% of the budget for the year 2012/13 and reducing even more by 2021. The *New Zealand Transport Strategy 2008* had a target for 2040 that 30% of urban trips would be by walking or cycling. This goal is completely unrealistic unless a higher percentage of transport funding is put into infrastructure for walking and cycling.

Currently walking and cycling is allocated less than 1% of the total National Land Transport Fund. However, walking and cycling infrastructure is often very cost-effective and has multiple benefits including reducing congestion, improving our health, reducing air pollution and making us more resilient to rising oil prices.

We believe funding for these modes should be increased immediately to 3% of the National Land Transport Fund, rising to at least 6% by 2022. Failing that, we ask that the lower edge of the funding band be raised, i.e. the funding band be changed to \$20-30 million. Only by taking these measures will it be possible to realise a reasonable number of the numerous walking and cycling projects that local Councils and NZTA regional offices would like to proceed with.

CAN approves of the consideration of the New Zealand Cycle Trail during local and state highway road improvements, as proposed the GPS 2012.

CAN considers the current way in which the Government Policy Statement process works is inflexible and too prone to political interference. Projects with very strong economic cases (or benefit cost ratios) can be delayed

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when the NZTA has exhausted all the funds available within their "percentage range" for that activity class.

At the same time many new state highways with very poor economic justification will be approved simply because the Minister has allocated a high percentage of funding to them. In order to get the best return from our investment in transport, all transport projects should be evaluated by the NZTA using the same criteria to determine which projects should have priority and be built first. This would mean all transport modes had a level playing field in terms of accessing funds.

Conclusion

CAN supports the recommendations and viewpoints expressed by our local groups who have also submitted on the GPS 2012.

CAN considers that the GPS 2012, while seeing some small improvements for cycling, is unbalanced and does not sufficiently address New Zealand's need for more active transport and public transport funding. We believe funding for these modes should be increased immediately to 3% of the National Land Transport Fund, rising to at least 6% by 2022.

CAN considers that the GPS should reduce the funding available for state highways, especially low BCR projects and apportion that money to the Walking & Cycling Facilities, Public Transport Services activity classes and to the Canterbury earthquake recovery.

CAN recommends that targets along with a vision that includes sustainability and the environment and objectives should be in the Forward Plan for Transport.

CAN believes that all transport projects should be evaluated using the same criteria to determine which projects should have priority and be built first.

Yours faithfully

A handwritten signature in blue ink, appearing to read "G. Lindup".

G. Lindup
Chair
Cycling Advocates' Network

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