



SUBMISSION

Transfund New Zealand

Draft Allocation Process 2005/06

Introduction

The Cycling Advocates Network (CAN)¹ is pleased to present this submission on Transfund's proposed Allocation Process. The national committee of the group has prepared this submission, with feedback from CAN members. CAN has based its submission on examination of the relevant consultation documents and other background information, as well as from the experience of its members involved in the land transport industry. If you require any clarification of the points raised by us, please feel free to contact us as detailed at the end of our submission.

General Comments

CAN is pleased to see the way in which Transfund is striving to redefine its role under the new landscape of the NZ Transport Strategy (NZTS), Land Transport Management Act, and other related Government initiatives. Clearly the process by which funding is allocated to local land transport programmes is a key factor in determining whether the needs of cyclists will be better met by transport facilities.

We are concerned however that the proposed process still does not adequately ensure that cyclists are fully considered and provided for consistently throughout the country. Indeed, there seems to be very little indication in the consultation material of how the relative allocations to each activity class will be determined or reviewed. There is a big difference between, say, (1) allocations determined by Transfund based on the principles of the NZTS, and (2) allocations based on the indicated programmes of "traditional-thinking" road controlling authorities (RCAs) that have not made the shift to the new policy framework of the NZTS. Our concern is that Transfund is still being led by RCAs, rather than doing the leading.

Ultimately the success of provision for cycling in New Zealand will depend on three key factors:

¹ More information about CAN is at the end of our submission.

- Ensuring a greater proportion of funding allocated for dedicated walking/cycling (W/C) facilities. Our own calculations² estimate that indicative cycling facility projects planned by RCAs over the next ten years would alone exceed the planned funding to this activity class, without considering walking projects, promotional activities, and the many RCAs who have not planned *any* W/C works yet.
- Establishing a system that ensures that, at the very least, no proposed roading project should make cycling conditions *worse*. At present there is no mechanism for checking that an RCA has considered the effect of its proposal on cyclists and mitigated any adverse effects, or (preferably) has incorporated provision for cyclists from the beginning of project development.
- Promoting adequate cycle provision training and guidelines for planners and practitioners involved in developing land transport projects. Without these measures, poor solutions for cyclists will be provided (if any at all). Transfund has been supportive to date in the development of some of these; we trust that it will continue to both support future development and promote such standards to the industry.

With this in mind, we encourage Transfund to champion more explicit support for cycling, and to develop guidance to enable RCAs to more effectively provide for cyclists in their land transport programmes.

Specific Comments

The following comments relate specifically to the various paragraphs throughout the consultation document:

Paragraph no.	Comments
10	<p>We are interested in the potential for "other approved organisations" to be able to develop a land transport programme, and wonder whether Transfund has done much work to discuss the issue with potential entities. Certainly, a mode like cycling (and related activities like travel demand management) has the potential to attract support from a wide range of other sectors (such as health, tourism, environment), and it may be that public agencies like EECA, SPARC, and ACC would wish to combine their resources with additional land transport funding for certain projects.</p> <p>Although the existing legislation may be somewhat restrictive here, the ability for some charities and trusts to also be approved organisations may be useful as well, e.g. the Hawkes Bay Rotary Pathway Trust, and various Rail Trail trusts. We would encourage Transfund and the Ministry to investigate legislative changes to allow for this.</p>

² See the *ChainLinks* cycling research article "Too much of a good thing" (June 2004), available on our website at www.can.org.nz/research/res-cl.htm

Paragraph no.	Comments
13	<p>We wish to make a number of comments about the current allocation process that signal where enhancements are needed.</p> <p>In Step 1 (Formulation) there is an expectation that there is a responsive, collaborative approach between organisations and affected communities. However this typically takes the form of consultation through the draft Annual Plan (and draft LTCCP). This is generally very ineffective as affected communities are often unaware of what is buried in the roading budget in a council's annual plan or draft LTCCP and indeed the detail of this is usually contained in an Asset Management Plan about which, to date, there has been little if any public consultation. Transfund should seek evidence of appropriate provision of information and consultation with affected communities and establish standards for consultation with key stakeholders such as cycling advocacy groups.</p> <p>We support the provision in Stage 2 (Assessment), for assessment to include <i>"questions about which options and alternatives were considered"</i> To date, however, there is little evidence that assessments have included a <i>substantive</i> analysis of alternatives. We are aware of numerous proposals where a reasonable alternative to a roading project could be better provision/promotion of walking/cycling and/or travel demand management. We would be interested to see details of assessments where analysis of alternatives has been undertaken.</p> <p>We also support the provision in Stage 4 (Programming) for Transfund to review programmes for their <i>"contribution to... the Land Transport Management Act, ...New Zealand Transport Strategy, ...National Energy Efficiency and Conservation Strategy [etc]."</i> However, it is difficult for us to see how Transfund are taking this policy seriously when a relatively minor proportion of funding goes towards non-roading options (and considerably less to walking/cycling). The current 10-year plan shows little evidence of likely change in this regard and, therefore, Transfund will continue to approve projects that undermine the goals of these various strategic documents. Much clearer alignment between Transfund's allocation process and these strategic documents is required.</p> <p>We endorse further work at Stage 6 (Monitoring), which has generally been an under-resourced area of Transfund's activities. For example, we would be interested to know whether many of the claimed travel-time savings for major roading projects are simply being superseded by longer trip-making (urban sprawl) and further congestion from induced additional traffic volumes. We also request a review of roading projects that claim not to discourage or endanger walking/cycling, to see whether this is indeed true.</p>

Paragraph no.	Comments
17	<p>We believe that Regional Land Transport Committees (RLTCs), suitably resourced and guided, are an important factor in ensuring that land transport programmes in each region are acceptably balanced with respect to the NZTS. To do this, RLTCs must adequately represent all RCAs in the region and also all transport modes; we are aware of many current RLTCs that do not have adequate cycling (and walking) representation. For robust analysis of the options, a technical advisory group supporting the RLTC is also an appropriate tool; however it must ensure that it contains some practitioners skilled in the planning of all travel modes. Transfund needs to play a strong role in both supporting the importance of RLTCs in the allocation process, and in providing suitable guidance on their composition and function.</p>
25	<p>We support the TRL recommendation of testing parts of the allocation process using real examples. Such testing should have a degree of independence (that is, should be carried out by external professionals or at least submitted for independent peer review). CAN has expertise among its members that it would be willing to make available for such testing. Such testing should focus on the effectiveness and comprehensiveness of consultation in the Formulation stage and the quality of analysis in the Assessment stage as well as Transfund's own processes (Prioritisation, Programming, etc).</p>
26	<p>We recommend that, under <i>"assisting approved organisations in specifying and undertaking strategic studies and review studies"</i>, Transfund gives significant emphasis to the development and review of more W/C strategies, and also encourage cycle reviews (audits) of existing transport networks. The latter is an under-used tool in New Zealand, yet is critical to identifying the (often relatively simple) retrofitting required on existing roads and pathways.</p> <p>CAN supports the development of <i>"guidance... on the preparation of regional land transport strategies and land transport programmes"</i> (the wording is a little ambiguous; we trust that this also includes district land transport programmes). We would like the opportunity to comment on any draft guidance and we also recommend that such guidance include clear requirements for consultation with relevant cycling advocacy organisations in the development of land transport programmes.</p> <p>CAN also supports <i>"encouraging inter-related and complementary activities to be co-ordinated and implemented as coherent packages and develop a good practice guide"</i>, as this is a potentially vital tool for stand-alone W/C projects (and related traffic management works). Many of these are relatively low-cost activities, where the project development, design, administration, and start-up overheads can be a</p>

Paragraph no.	Comments
	<p>considerable proportion of the overall project cost.</p> <p>Another priority for Transfund should be the further development of procedures for evaluating the newer activity classes like W/C and travel demand management. Take-up in these areas will not be high, so long as there is uncertainty about how to assess such projects. Smaller RCAs, who often have very few staff involved in land transport planning and implementation, may in particular need some centralised support (e.g. a "centre for excellence") to assist them with project submissions in these areas.</p>
30	<p>As discussed in paragraph 10, CAN welcomes further moves to allow a wider range of funding options, as an activity like cycling attracts support from a wide range of sectors. We would be concerned however if the ability to obtain funding from other sources was used as a reason to limit funding from Transfund. Cycling is an area still under-resourced at both central and local Government level, so often external funding sources may be needed to provide the impetus for a project, particularly where local councils are still reluctant to commit to funding through rates.</p> <p>We are aware of perceptions that walking/cycling activities should not receive a substantial level of central government funding given their "community" and "recreational" attributes. However, a similar proportion of leisure trips (e.g. shopping, socialising, tourism) are made by motor vehicles as by walking/cycling³, yet there is no similar suggestion that central government funding cannot support this motor vehicle travel. Transfund needs to provide clear leadership to territorial local authorities that centrally allocated funding for transport must support the government's stated priority of promoting walking and cycling for all trip purposes.</p> <p>In practice, it is also difficult to clearly categorise facilities as serving leisure/recreation purposes on the one hand, and utilitarian purposes on the other. A Rail Trail, for example, may be beneficial for some commuter cyclists. Conversely, an urban facility may be used by recreational cyclists to get to a leisure location.</p>
41	<p>It is not clear what the implications from allocating nationally and regionally distributed funds are for different activity classes. For example, does the additional regional funding have to be balanced across the various classes? We have a concern that some regions will see this additional funding simply as an opportunity to get more roading</p>

³ NZ Household Travel Survey 1997/98, LTSA

Paragraph no.	Comments
	implemented, when of course, potentially, it could also add significantly to the relatively meagre W/C allocation from the national funds.
51	We have a concern that the priorities of a cycling-proactive RCA may be diluted by other RCAs in the region. For a relatively minor activity class such as walking/cycling, this could have significant consequences.
58	<p>Option (a) (<i>"treat supplementary funds as part of the local authority's funding share"</i>), is preferable for cycling projects. This is especially so if Transfund decides that leisure/recreation facilities do not qualify for subsidy, although these projects may have strong community support including supplementary funding.</p> <p>We see no reason why option (c) (<i>"use supplementary funds to reduce the total cost of a project prior to applying Transfund's funding policy"</i>) could not be used for major roading/PT projects, with option (a) being used for W/C projects.</p>
63	<p>In many previous meetings with Transfund, we have raised the issue of using project submission/assessment forms as a means of checking for adequate cycling provision. We note that the two existing Assessment Forms give minimal attention to the proposed effects on cycling of a project (among many other factors). Even then, it is only for activities costing more than \$3 million that an individual (rather than generic) assessment of these effects is required. The forms also appear to allow a proposal to be negative with regards to meeting some NZTS objectives. While we would be very interested in seeing some of the assessments to date, our suspicion is that this process is not providing a robust mechanism for ensuring that all projects are at least <i>cycling-neutral</i> in their outcomes and (ideally) have considered cycling provision from the outset.</p>

Other Relevant Comments

Our evaluation of the proposed allocation process has highlighted other issues that do not appear to be addressed in the consultation document:

- The Financial Assistance Rates (FARs) determined by Transfund are a very powerful tool for influencing land transport priorities by RCAs. We note that Transfund has had some difficulty in the past with obtaining sufficient funding bids in new activity classes such as Walking/Cycling and Alternatives to Roding. While this is partly because of a lack of assessment tools and unfamiliarity with these type of projects, it also reflects the reluctance of RCAs to invest in these areas. If Transfund truly wished to see greater take-up of these areas, in accordance with the NZTS, then it should consider higher FARs for these activity classes, in the same way that new public transport services were heavily subsidised a few years ago.

- Even with a dedicated W/C activity class now into its third year, it is notable that a significant number of TLAs and Transit regions still failed to have any indicative projects in this area⁴. It is inconceivable that *any* RCA could not find some walking/cycling issues in their districts (even the development of a strategy), although we acknowledge that they may be addressing some of these issues as part of more general roading projects. Nevertheless, we feel that part of Transfund's role should be to query these anomalies and to ensure that such RCAs either justify their proposed land transport programme or amend it accordingly. Similarly, Transfund needs to play an active role in ensuring that all Regional Land Transport Strategies adequately consider the opportunities for walking, cycling, and travel demand management, so that the relevant RCAs are guided appropriately.
- Another interesting observation from this year's NLTP was the relative amounts of committed funds across activity classes. Less than 15% of the "road improvement/replacement" funding is yet to be specifically allocated to projects; yet *over 75%* of the W/C funding is not specifically allocated yet. This is reflected again in the list of "indicative" W/C projects for 2004/05. Apart from the \$880k of committed projects, another \$16 million of potential projects for Transfund funding are listed, for just \$3.2 million available funding. This proportion is far higher than any other activity class, and gives us some concern about the certainty of various cycling projects going ahead. It also makes us wonder about the relative priority that these projects are being given, both at RCA and Transfund level. While we accept that there are some significantly large roading projects that require some programming certainty (without going into the merits of them being there in the first place...), the resulting process does appear to give RCAs quite some leeway in not completing particular cycling projects within a given timeframe. We request that Transfund review their procedures for indicative W/C projects, with a view to tightening up the certainty of their implementation in the near future.

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The Cycling Advocates' Network of NZ (CAN) Inc is this country's national network of cyclists and cycling advocate groups. It is a voice for all cyclists - recreational, commuter and touring. 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. In addition, many national/regional/local government authorities, transportation consultancies, and cycle industry businesses are supporting organisations.

⁴ *National Land Transport Programme 2004/05*, Transfund NZ