

Campaign for Better Transport



Cycling Advocates' Network



Cycling Support New Zealand



Telework New Zealand



Walk Wellington (we are becoming Living Streets Aotearoa shortly)



Auckland, Wellington, and Christchurch - 5 July 2002

Congratulations and Thanks

Congratulations for creating a forward-thinking and integrated draft New Zealand Transport Strategy.

"Thank you" for the opportunity to comment as the "Other Users" reference group on Friday 28 June 2002.

As a follow-up to the meeting, the five "Other Users" groups have produced a combined document providing written feedback on key points. Some of these points have been raised during the meeting and are only reiterated here, and other issues were not discussed during the meeting.

Please note that the comments made in this document are not meant to replace the comments made in person during the meeting. Also note that the terms "on foot", "pedestrian", and "walker" include the users of wheelchairs, shopping and delivery trolleys and push-chairs.

General Feedback

Lack of Goals and Targets

Since the consultation document is a strategy, it should have some goals/targets, not just woolly 'this is what we're doing' descriptions. The 'Road Safety Strategy', for example, sets quite a few specific targets, so why not for other transport aspects? We suggest that the strategy needs targets for traffic reduction, cycling modal share, walking modal share, passenger transport modal share, teleworking, freight percentage on rail, reduction in fossil fuel use, and environmental effects (ambient air quality - both particulates and gases, water quality, and noise).

Status of the NZTS

The strategy contains nice words about what Government intends to do (or are already doing) but no absolute commitments either to actually do those things (e.g. "The government will evaluate options for further reducing road vehicle emissions", rather than "Further initiatives include...") or to implement the recommendations that come out of that further work. This undermines the strength of the document and lets it appear very uncommitted.

There is no requirement on TLAs or other RCAs or Regional Land Transport Committees to act in accordance with the NZTS. There should be, otherwise they can happily go on doing nothing. Their work should be required to 'be consistent with the NZTS'.

The NZTS should be enshrined in legislation, with an interim position of operating as a Ministerial policy statement until legislation can be prepared. This will give certainty to everyone about the aims and directions of transport policy. If it isn't, transport policy will continually be subject to a change of heart by whatever Minister is in place.

Strategies for different Levels

We would like National, Regional and Local Transport Strategies to deal separately with walking, public transport and cycling in the future since many of the promotional tools and engineering improvements required are quite different. Traffic speed and volume are one interest in common, but crossings and cycle parking are just as different as trucks and cars.

A very useful output from the Strategy would be to alter the minimum makeup of Regional Land Transport Committees so that a statutory minimum would be to have three separate representatives for public transport, walking and cycling; just as there is separate representation for public transport operatives, freight road transport and the AA.

Reducing the Need to Travel

The National Energy Efficiency and Conservation Strategy includes "reducing energy use by reducing the need for travel" as its first objective, yet this is ignored throughout the strategy. Eliminating the need for travel (where appropriate) can produce major congestion, productivity and individual benefits.

This can partly be achieved by land use planning so facilities are less likely to be built inaccessible by pedestrian, cycle or public transport. Local councils can facilitate access when planning changes to community facilities.

ARC research suggests that a 5% cut in trips is possible through telework initiatives at a fraction (i.e. less than 3%) of the cost of roading and public transport alternatives. That the New Zealand Transport Strategy totally ignores this potential is a fundamental flaw.

Smart businesses seek to eliminate problems, not accommodate them: smart planners do the same. It is arguable that a sensible Transport Strategy would seek to:

- 1) Eliminate the need for travel wherever possible (e.g. through telework and its derivatives, online shopping/banking, combining multiple trip purposes into fewer trips).
- 2) Promote walking, cycling and other non-polluting, health-inducing travel modes.
- 3) Develop appropriate public transport solutions that actively support multi-mode trips. This should focus on "bike and ride", or bikes on public transport, or paying attention to safe pedestrian accessibility around stations (sort of, "walk and ride"), as this is of greatest benefit. Care should be taken that car park and ride does not increase car use (as it has in some cases in the UK) or create traffic problems near stations (which in themselves can discourage cycling or walking to the station.)
- 4) Encourage car and vanpooling wherever practical.
- 5) Only as a last resort, accommodate the trips that are left through road developments.

Travel Time Savings

We suggest that new roading items and capacity increases should be carefully examined and only pursued when trip reduction strategies, travel demand management options and improvements to other modes have been fully considered. 'Travel time savings' are by far the major item in economic evaluations, which give reason to proceed with these proposals (note that in major roading projects, travel time savings generally exceed predicted road safety benefits by an order of magnitude). While we understand and appreciate that the benefit cost ratio will no longer be the only criterion in the evaluation of roading proposals, this will nevertheless still be the major deciding factor.

No city in the world has succeeded in building its way out of congestion, as over time induced traffic fills up generated road capacity. "Upgrading" major arterials and building motorways is what accelerates urban sprawl. Economic justification of building these major roads is fundamentally flawed in our opinion as you can't save travel time, because over time people will travel further (in fact, the 'travel time budget' has been constant over the last century¹). Hence, we suggest a radical rethink in the methodology of justifying roading expenditure.

PFM constraints

The Programme and Funding Manual states in section 2 under Work Category 41 that "the cycleway construction category provides assistance to territorial authorities to construct new cycleways...". Thus, Transit NZ (which is not a territorial authority) is excluded from getting funding for cycleways (which are segregated from the carriageway). Note, however, that Transit NZ will get funded for provided cycle lanes (that are marked on the carriageway).

The underlying "reason" is that cycling is seen as a "local" mode of transport, and SHs are seen as catering for non-local transport:

- 1) This ignores the fact that a very high proportion of all car trips, those on SHs included, are over very short distances - yet these trips are not excluded from the justification for SH building through the BCR calculations!
- 2) A proportion of cycling trips will NOT be local.
- 3) Tourism promotion is explicitly within Transit's mandate, and this must surely include cycle tourism.

If pathways along State Highways are to be built, under the current regime the funding has to come from a territorial authority. This requires goodwill by both road controlling authorities (RCA's) (or more than two RCA's, if a territorial authority boundary is crossed) and a high level of co-ordination. This is very rarely the case and consequently, very few cycle paths or shared pathways exist alongside State Highways.

This set-up is also a major hindrance in the planning process. If land is designated for a State Highway corridor, the designation will usually not be wide enough to accommodate a pathway within it. But how can there possibly be a good result achieved for cyclists and pedestrians, if the designation cannot accommodate a pathway?

We submit that Transit NZ should have the responsibility **for all modes of transport** using the SH corridor, and the whole road corridor planning and development. In any other set-up, cyclists and pedestrians will only ever come second best (if considered at all).

¹ We intend to submit a reference to this.

Traffic Growth / Reduction

The draft strategy mentions a reduction in the growth of traffic volumes only once (see feedback below). Pedestrians and cyclists are adversely affected by ever growing traffic volumes, with reduced road safety as a direct result, a declining environment etc. The submitters thus recommend considering aiming for a reduction in traffic, not just a reduction in traffic growth. Cycling, walking and passenger transport make much more efficient use of road space than private motor vehicles and should be promoted as traffic reduction measures.

The following policies could be considered (note that this list is by no means complete):

- 1) One small step towards this would be to change the composition of the fixed and variable costs of motoring. Reducing the fixed components (i.e. motor vehicle registration) and adding this component to the variable costs via petrol excise would help to reduce motor vehicle usage.
- 2) A second small step could be to actively endorse and support projects that reduce the need for motor travel.
- 3) A third simple step would be to instruct IRD to permit travel expense reimbursement to legitimately include walking or cycling at a similar rate to driving, without it being subject to fringe benefit tax. This level of travel allowance has been paid by at least one UK health authority.
- 4) Third-party insurance should be made compulsory. This will probably result in many barely road-worthy cars being removed from the vehicle fleet (as it would remove current owners who can only afford to buy the cheapest of cars), with subsequent improvements to the safety record, as it is known that these vehicles are over-represented in the crash statistics.

While reducing the fixed costs of motoring (point 1 above) will reduce the barriers to accessibility to a car (i.e. ownership), compulsory third-party insurance would counter that.

Walking and Cycling as Legitimate Modes of Transport

Throughout the Draft Strategy (and in the Overview document), the critical reader gets the impression that cycling and walking are not regarded as legitimate modes of transport. Examples of that are numerous. Cycling and Walking are absent from the 'Key Facts' boxes on pages 1 and 14. The myth that public transport is the only alternative to the car is reiterated in the 'Overview' document (page 14, second paragraph).

"Cycling accounts for around two percent of travel trips, mostly made by children and young adults" (page 18, key facts). Once again, this repeats the myth that cycling is only for kids. It depends on your definition of "young adult"

but, from the LTSA Travel Survey, more than half of the kilometres cycled are by people aged 20+ years. Alternatively, the strategy could state "Cycling accounts for around 2% of travel trips, half made by adults". In our opinion, a very different impression is given by this way of putting it.

Statistics for modal split underestimate walking numbers significantly for three reasons:

- 1) Because under 15s are not counted.
- 2) In multi-modal trips (e.g. 5k bus, 1k walk or 10k drive, 500m walk) the walking is always the shorter distance and therefore discounted.
- 3) Often the emphasis is on commuting trips rather than daytime/evening shopping or exercise or visiting.

Funding Issues

The imbalance listed above is also reflected in the level of funding available. 2.2% of trips are made by bus, and around 0.25% are made by rail. Cycling with some 2% of travel trips is therefore quite similar in numbers compared to bus trips, with walking being much more important. Yet, Government has set \$53m aside for 'Kick Start Funding', while Cycling and Walking have only been allocated \$3.7m.

Rail infrastructure should receive comparable funding to roading. Until this year, roading received more than \$1.5b in public funds, whereas rail infrastructure received nothing.

It is also noted that telework, already utilised by around 2.3% of the CBD populations of Auckland and Wellington, receives no funding at all. Although teleworking could in theory be funded as "Alternative to Roothing", it would help for it to be specifically mentioned as an option, or given its own funding category.

Fossil Fuel Reliance

New Zealand (and the rest of the western world) is too reliant on fossil fuels. Notable research has been done to quantify the amount of remaining oil and some predict that demand will exceed supply within the next 10 years. Supporting research can be found on the somewhat sensationally named <http://www.oilcrisis.com> and <http://www.msnbc.com/news/734648.asp?cp1=1>. At the very least New Zealand should attempt to quantify the remaining oil available from the world's resources.

Following on from this, CBT believes that New Zealand should be developing long-term strategies such as alternative fuels and investment in alternative medium-long distance transport (e.g. electric rail). This is a chance for NZ to lead with technology and not merely become a knowledge taker.

Specific Feedback

Note: It would be nice to be able to provide specific feedback on trip reduction and related initiatives within the Strategy but as such approaches are not specifically addressed, this is not possible.

Assisting Economic Development

On page 6, there seems to be a focus on observed deficiencies in some infrastructure rather than whether the right people are using the right infrastructure. There is often an argument that the nation needs improved transport infrastructure (usually roading) to grow the economy. In roading for example, we can see economic reasons for ensuring that cross-town freight or inter-district driving is able to do so fairly efficiently. This doesn't mean that we have to "upgrade" the associated roading infrastructure if instead we can shift long-distance freight to rail, commuters to public transport, telework, cycling and walking, school kids to walking/cycling, some people not to make a trip at all, etc. These people won't cause the nation to fall to its knees by choosing different transport options. Indeed, they could directly support the growth and productivity of New Zealand as a genuine knowledge economy.

While it is nice that the "building our way out" myth is acknowledged (page 6, 2nd paragraph), it is prefaced by the implication that we have to deal with the "urgent measures" first, before stopping the road-building programme. In other words, when we've given them enough money to build all the highways identified to "fix" the severe congestion, etc, they'll stop asking for any more? This is obviously nonsense and we appeal to Government to make decisions now that are consistent with the fact that building more roads will not relieve congestion, rather than leave that decision to future Governments.

Assisting Safety and Personal Security

A more correct caption for the figure on page 10 would be 'Road fatalities for year ending 31 December' (it is not a 'rate', presumably refers to road traffic only, and shows fatalities rather than casualties). We would like to see accompanying graphs (or included in the same figure) for pedestrians and cyclists, which unfortunately have not experienced the same dramatic decline.

We are interested in the statement (page 10) in the first paragraph on the left that the strategy will "recognise the contribution that reduced dependence on private vehicles can make to improving safety", i.e. reducing traffic growth reduces exposure, which also reduces crashes. NZ's Road Safety Strategy 2010 was only focused on reducing the "crash rate" side of the equation. CAN saw a similar approach (i.e. reducing traffic growth) in the Finnish Road Safety Strategy that we passed onto LTSA for their info. So it's good to see that mentioned here, but we can't see it followed up anywhere in the draft strategy.

The draft strategy starts alluding to the new 2010 Safety Strategy (page 10), but we still haven't seen it! A target of 300 fatalities per annum by 2010 is not satisfactory. We support a 'Vision Zero' safety strategy as in Sweden.

Page 11, bottom paragraph: "Many short journeys made today by car could be replaced by walking or cycling, where the necessary safety improvements have been made". Many short journeys already have the necessary safety to complete them! In many places, it's not that dangerous to walk down to your local shops for example. This qualifier is an unnecessary excuse-finder.

Page 11 bottom, and top of page 12: The other way to deal with people's concerns about safety & security is to show them that it's not really a problem! Many problems are perceived only, so more work on travel behaviour programmes for example and getting people to try out new options would be more useful than "crime reduction and overall policing strategies".

Equity - children should have the right to pass freely and safely to schools and activities. LTSA and Police recommend children do not cycle on the road unaccompanied until 10 years of age. The perception is that it is not safe for children to walk or cycle to and from school. More children are driven, making it less safe for the children who are not driven. If these agencies make these statements, it is an indictment on how they have been doing their job, and places the onus on them to ensure that they work to ensure that it is safe to do so.

Missing in the strategy is the very big need for on-road cycle coaching for adults as well as children. The overwhelming bulk of cyclist training is currently undertaken in off-road simulated situations (e.g. school playgrounds) and directed at adolescents. This is a major flaw on two counts:

- 1) It ignores that the main skills required are those for interaction with other traffic, and by comparison this makes up the bulk of motorist training through on-road driver coaching. Only by on-road cyclist coaching would the necessary skills be taught by which would-be cyclists would be enabled to overcome the very real deterrence that motor traffic plays in the take-up of cycling, and in addition learn how to behave safely in relation to other traffic.
- 2) Existing training reinforces the impression that "cycling is for children", to be "grown out of" when one is old enough to drive. A further advantage of this approach is that the presence of cyclists being coached on the road (and appropriately advertised as such) would help legitimise cycling as a mode of transport in motorists' eyes. This, in itself, would reinforce the education of motorists on how cyclists should and are likely to behave on the road, which would need to accompany on-road cyclist coaching as part of holistic "Share the Road" education.

Improving Access and Mobility

Page 14, 2nd paragraph on left: "Policy and regulation will recognise that motor vehicles are not the only users of roading space and will ensure that the needs of others, such as pedestrians and cyclists are catered for". And in some cases recognise that motor vehicles should have the fewest rights in certain roading areas!

Walking and cycling provide cheap, healthy transport alternatives. However, transport infrastructure often creates an impediment to mobility for pedestrians and cyclists (eg. Auckland Harbour Bridge, Lyttelton Tunnel, high-speed multi-lane roads). The Government has recognised the benefits of these modes and seeks to promote them. Therefore future infrastructure projects must promote walking and cycling and should offer no lesser level of service than existed before, and preferably better.

We suggest that further work on quantifying social severance costs caused by lack of access by pedestrians and cyclists be undertaken. Opus (Fergus Tate) did some Transfund research on this topic some years ago, and there has been some more recent work by Booz Allen Hamilton, but there are no tangible (dis-) benefits identified in the PEM.

Improved access for pedestrians must include adequate access for the visually impaired and people using wheelchairs.

Community Walkability Audits should attract some Transfund subsidy. These could be done by TLAs or contracted trained pedestrian advocates.

Protecting and Promoting Public Health

It is great that the Government has recognised the health benefits of walking and cycling. All New Zealanders should incorporate at least 30 minutes of moderate intensity activity as part of our daily routine. Our transport system must be designed in a way that facilitates incorporating this activity into healthy forms of transport like walking and cycling. The journey to work - by foot or cycle - is for many people the easiest way to work into their lifestyles this "30 minutes a day gentle exercise" prescription.

It is a problem that the health promotion agencies either:

1. Focus overwhelmingly in playing sport (in spite of some shift from this in recent years), or
2. If they don't do this, then focus on cycling/ walking as discrete activities separate from lifestyle (e.g. "go for a ride in the park at weekends"), or
3. If they do focus on lifestyle changes, generally ignore the journey to work (e.g. "walk up the stairs at work").

Ensuring Environmental Sustainability

Walking and cycling consume less energy for distance travelled than any other known mode of transport. Their CO₂ emission is effectively zero. They demand very little space in terms of infrastructure. Walking and cycling are environmentally sustainable.

Telework is equally environmentally sustainable, as it reduces the need for travel in the first place.

The Role of the Government

Page 27, last paragraph: We recommend that these inter-ministry links be specifically spelt out. The 'Overview' document contains a list of 'related government agencies, policies and strategies'. The Police seem to be missing in that list, although the level of enforcement has undoubtedly a direct correlation to road safety (as was most obviously shown when the Traffic Units got abolished). We are also surprised that a 'Safe Routes to Schools' policy is not listed with the Ministry of Education.

Our Priorities

Throughout the document, the \$3m fund for walking/cycling (which in the meantime has been increased to \$3.7m) is mentioned numerous times, without any other mention (other than 'infrastructure') of how to spend this money. The priorities of the submitting parties is²:

1. 'Share the Road' campaign.
2. Development and adoption of standards for cycling and pedestrian infrastructure.
3. National support for Safe Routes to Schools campaign.
4. Improved processes (including changes to funding criteria and adoption of cycle audit and cycle review which will lead to improved ongoing access to funding). Inclusion of health benefits in cost-benefit analysis for walking.
5. Better cycling and pedestrian data gathering by LTSA, Police, RCAs, ACC and others.
6. Training for transport professionals, including consultants.
7. Promotional and behavioural encouragement of modal shift, e.g. "Travel Smart" programmes.
8. Support for travel reduction measures (including telework).

² Please note that many of these activities can occur concurrently, and a 'lower priority' does not indicate that we would be indifferent about a deferred start, as we would very much like the whole list see actioned on.

9. Development of national, regional and local cycling, walking, and passenger transport strategies.
10. Cycling and walking infrastructure.
11. Research on cycling, walking & passenger transport, with a particular focus on behavioural, marketing-related and safety aspects.
12. On-road cycle coaching.
13. Community safety audits.
14. Travel expense tax changes.
15. Creation of a Sustainable Transport Policy Unit at the Ministry of Transport.

In addition to this, we submit that telework with its inherent opportunities be included in the final strategy.

Axel Wilke

on behalf of Campaign for Better Transport, Cycling Advocates' Network, Cycling Support New Zealand, Telework New Zealand, and Walk Wellington.