

Draft Government Policy Statement (GPS) on Land Transport 2018

Submission by Transportation Group NZ

final v3 (2/5/18)

Thank you for the opportunity to provide comment on the draft GPS. This submission is on behalf of the Transportation Group New Zealand. A draft submission was developed by the National Committee and circulated to our membership, and the comments received have been collated and reviewed to form this final submission.

About the Group

The Transportation Group New Zealand is a Technical Interest Group of Engineering New Zealand, with over 1,100 members. The Group was formerly known as the IPENZ Transportation Group. More information about the group can be found at <http://www.transportationgroup.nz/>.

Membership of the Group is open to anyone with a professional interest in or who is directly involved in transportation matters. The Group operates with the purpose of advancing the technical knowledge, planning and management of land-based transportation facilities, networks and systems for the movement of people and goods.

The Group aims include:

- developing and sharing national and international advances in engineering and technological knowledge, standards, and technical expertise so as to assist in the professional development of members;
- contributing to the development and recognition of good practice, facilitating the planning and creation of better transportation networks and management practices, so increasing the productivity of existing and new transport systems;
- supporting Group members in their career development, through conferences, education, training, workshops, research and publications; and
- providing opportunities for the sharing of ideas and creating a national network for members.

Membership is drawn from the full spectrum of all those who provide services in the transport industry, particularly those from engineering and planning backgrounds.

The Transportation Group is recognised as the foremost impartial and credible voice on transportation issues in New Zealand. Its perspectives are invariably sought when new policies and legislation are being developed. It makes a significant contribution to the major transportation debates of the day, often taking the lead in raising issues for consideration.

General Comments

The Group strongly supports the vision demonstrated by the draft GPS. It is a bold statement and will require considerable effort to implement but we applaud the intention. There are a lot of details to support within this draft GPS and we hope to see their implementation in the final version. Timing of key measures will be critical, as many of the likely benefits expected to be realised will occur more as the strategy is implemented for longer.

We particularly appreciate the greater emphasis on safety to create a system free of death and serious injury. We look forward to the development of a new Road Safety Strategy that encapsulates the aspirations of this aspect of the GPS, particularly in considering adopting a “Vision Zero” approach. We note the desire to increase the focus on public engagement and to deepen community understanding in this area (p.11) – particularly getting past the simplistic economic comparison of travel time delays with societal costs resulting from crashes. As a Group with many experts in this area, we are very willing to help with this public discourse.

The broad definition of ‘access’ is also strongly supported, rather than a narrow definition based around being able to efficiently move vehicles from one place to another. The draft GPS recognises that accessing economic and social opportunities is undertaken in a variety of ways by different people and can also help achieve other key objectives around amenity, social inclusion, resilience, public health and the environment. We would however suggest that greater attention needs to be placed in the GPS on the needs of the less mobile, particularly in terms of walking environments. The attention to resilience in this GPS is also supported and particularly critical, given the growing concern about extreme climate events and their impact on communities and their transport systems.

The draft GPS continues to emphasise ‘value for money’, which is an important consideration when there is a finite amount of funding available. The Ministry of Transport noted that some of the previous (and ongoing) expenditure in major roading projects considerably skewed the traditional mixture of investments to allow much more construction to be undertaken with a low calculated economic return¹. While there is always a need to consider the wider intangible benefits of any project (particularly outside the traditional transport benefits of travel time and safety), we feel that there is considerable scope to increase the proportion of higher-return transport projects into the investment mix (and for the benefit of a wider proportion of the country).

The proposed new activity classes for rapid transit and transitional rail are a welcome addition to the land transport mix; they should help to ensure that a wider range of options are available to travellers and freight forwarders both within and between our major metropolitan centres. Having heavy rail largely funded and assessed separately from other land transport options, as it recently has been, is a historical anomaly that has struggled to deliver the optimal integrated solution for particular situations. However, we recognise the significant costs associated with some rapid transit infrastructure puts pressure on the funding envelope for transport.

The three overarching themes proposed (mode neutrality, incorporating technology & innovation, integrating land use and transport) are very sensible and offer a lot of scope for changing the way we have traditionally delivered transport. If anything, this GPS could include greater coverage of the role of “Mobility as a Service” (MaaS) transport systems in the near future. Already we are seeing the convergence of multiple transport options (e.g. Uber, bike-share, park’n’ride) coupled with wide availability of personal traveller information (especially via smartphones) and it is likely to significantly change the way that many people travel in New Zealand.

¹ *GPS 2015: Capital spending on roads*. Draft working paper provided by the Ministry of Transport to the Minister of Transport on the draft GPS 2015.

We note that these overarching themes, and the greater focus on safety and access, may require considerable change in the strategic direction and specialist skills of the transport sector (including the re-training of existing practitioners) and therefore some serious thought will need to be given as to how the necessary industry capability can be provided in a timely manner. Our Group is willing to provide guidance on how best to achieve this upskilling, as well as the communication to the industry of wider policy changes.

We would like to highlight that it is critical that the NZ Transport Agency’s *Economic Evaluation Manual* (EEM) is reviewed to ensure the emerging GPS themes are adequately reflected in the EEM. Without such a change, strategically important projects will be held back by an outdated assessment process that heavily weights vehicle travel-time savings compared to other benefits. We are encouraged by the signals in the *Draft Investment Assessment Framework for the 2018–21 National Land Transport Programme*, currently out for consultation.

We also welcome the planned development of a second-stage GPS, particularly in developing in more detail the role of rail and coastal shipping. However, we would encourage the Government to work with the transport industry to look for opportunities with these modes now, and to accelerate preparation of the next GPS.

The challenge with the final adopted GPS will be in trying to develop an implementation programme that fits available budgets and is able to be undertaken in a reasonable timeframe with the available human resources to hand (planning, design, construction, management, etc). As an industry group, we can help to encourage people into the sector and to highlight/disseminate best practice, but it will take a coordinated effort between industry and government to help achieve good timely outcomes.

Specific Comments

Page 3, paragraph 6	The GPS acknowledges its link here with the Regional Land Transport Plans (RLTPs); however, there is scant discussion elsewhere in the body of the GPS about how local government is a significant partner in the planning, funding and implementation of land transport in New Zealand. Given that RLTPs typically have a multi-decade long-term view, whereas a GPS may be subject to the political whim of a new government after only three years, it seems appropriate to recognise the need for ongoing dialogue between central and local government to ensure consistent objectives and outcomes at both levels.
Page 8: Access in GPS 2018	Although touched on here, it is not clear whether regional investment through the Provincial Growth Fund might include further cycle trails. Given the economic value demonstrated by the NZ Cycle Trail programme to date, this would seem a prudent use of such funding in many cases.
Page 8: Value for Money in GPS 2018	Reference to “enhanced reporting on the outcomes achieved by investment” would suggest greater use of post-construction investment reviews and before/after monitoring of key performance indicators. We would support greater use of such an approach. Also, it seems relevant here to reference the need for the EEM to be reviewed to adequately reflect the emerging GPS themes.
Page 9, paragraph 25	To achieve “further investment in cycleways and footpaths” would require some improvement to Funding Assistance Rates regarding footpath maintenance (currently not co-funded at all by central government). This is a relatively minor additional investment that should be seriously considered.

Page 10, paragraph 31	<p>We support the inclusion of measurable targets in the next road safety strategy, ideally with considerable ambition. International evidence has found that jurisdictions with specific road safety targets tend to perform better than jurisdictions without them; those that propose ambitious “stretch” targets tend to perform the best.</p> <p>We are pleased to see relatively limited discussion of the role of driverless (or autonomous) vehicles in this GPS. It is our general contention that fully autonomous vehicles are still decades away from becoming mainstream across New Zealand and, therefore, largely outside the scope of this document’s timeframe². However, encouraging greater take-up of available proven safety systems (e.g. Electronic Stability Control, side/curtain airbags, automatic braking assistance) should be strongly progressed.</p>
Page 10, paragraph 32	<p>We agree that research, data and monitoring programmes are important to fully develop the necessary evidence base for a new safety strategy. In recent years, it appears that some aspects of this work have stalled. We welcome further elaboration of this area; for example, it is not clear what changes to investment in research and monitoring might be proposed. It is also not clear whether this area would also extend to greater use of empirical trials of new/innovative treatments and approaches, which often require greater logistical support to introduce and monitor.</p>
Page 10, paragraph 35	<p>We support the acceleration of implementing the <i>Speed Management Guide</i>, although we question the arbitrary selection of the “top 10%” of the network for treatment; indeed, it may not be enough. An evidence-based strategy with measurable targets would allow a clearer indication of exactly how much of the network needs to be targeted to achieve the desired casualty reductions. As well as infrastructure investment to “engineer up” the safe speed of some arterial routes, we note that investment may also be necessary to “engineer down” some roads to encourage a more appropriate speed suited to the surrounding community and its needs.</p>
Page 10, paragraph 36	<p>It is clear that there is considerable room for safety improvement in the current local road network; however, many local authorities are very constrained in how much they can use local ratepayer funds to resolve these problems. Therefore, we support any means for central Government to assist with greater funding of these necessary works, e.g. by use of greater Funding Assistance Rates.</p> <p>Local authorities (particularly smaller ones) are also often severely constrained in terms of sufficient adequately skilled staff to understand and implement best-practice road safety initiatives. We suggest that central government agencies could play a stronger role in helping to provide appropriate “external expert” resources to support local authorities in achieving good road safety outcomes.</p>
Page 10, paragraph 39	<p>We note that significant improvements for walking and cycling can also be gained by reduction of traffic volumes; for example, by construction of arterial bypasses away from urban areas, or from strong local area traffic management schemes.</p>
Page 11, paragraph 43	<p>We support the use of regulatory changes to improve safety, and to also increase uptake of active modes. In this regard we support the proposed policy developments listed here and encourage added consideration of</p>

² For example, see D. Gatland (2017), “The Future of Transport: Autonomous Vehicles?”, *IPENZ Transportation Group 2018 conference*, Queenstown 21 – 23 March 2018

	recommendations from the Cycle Safety Panel report (2014), and recent research work on regulations of electric bicycles. We would also recommend progressing give-way rules for pedestrians and people on bikes crossing side-streets (i.e. whether drivers turning into or out of side streets should have to give way to them as they already have to for on-roadway vehicle through-traffic), with suitable design provisions to ensure safe crossings.
Page 12, paragraph 56	We suggest expanding this point: “This priority is delivered through the objectives of access, transport choice and resilience, as provided for in the preparation of Regional Plans and District Plans that make provision for the short (10-year) the medium (20-year) and the long term (30-year) urban and regional development needs. ”
Page 13, paragraph 67	We suggest it is appropriate here to also discuss the role of rapid transit between Auckland and the Waikato region. Enabling greater ease of transport for Waikato residents to access Auckland will help to minimise the considerable housing and infrastructure demands currently being experienced within Auckland.
Page 13, paragraph 76	We suggest including the role of inter-city rail here under public transport investment, including Auckland-Hamilton and Wellington-Palmerston North. Mention of “shared vehicles” probably also needs some further expansion, as this can include both concurrent sharing (e.g. buses, ride-share) and consecutive sharing (e.g. public bike-share, car-share schemes). Both are important to future “Mobility as a Service” (MaaS) transport systems.
Page 14, paragraph 85	We suggest explicitly adding under regional transport “developing cycle trails and cycling routes that enable tourists to explore parts of the country”
Page 15, paragraph 92	Another policy aspect that could be reviewed here would be fringe-benefit taxation on public transport or walking/cycling subsidies paid by employers, and the fact that, in comparison, free parking spaces at work do not incur fringe-benefit tax. This “uneven playing field” disadvantages employees and employers wanting mode shift to reduce single-occupancy car use.
Page 15, paragraph 93	We would like to express support for the specific inclusion of investment into delivering the key missing links in Auckland and Wellington’s urban cycle networks, i.e. “SkyPath” in Auckland and the “Wellington to Hutt Valley Link”.
Page 16, paragraph 95	The investment list here appears to focus on making public transport more available for those with limited access to choices. However, this fails to recognise the important role that good walking environments play for those with impairments of some kind who are unable to use options such as cars and cycles. This includes both walking as a complete trip and as a means to access public transport.
Page 19, paragraph 125	We suggest adding the additional point: “- <i>planning and protection of major transportation corridors, with sufficient space to insulate adjacent development from adverse environmental effects of heavy traffic along these corridors.</i> ”
Page 21, paragraph 138	We support further investigation of the appropriateness of current transport evaluation practices (within the EEM and the business case process) to be reviewed to adequately reflect the emerging GPS themes. This is particularly important in prioritising safety projects where relatively small individual time savings are purported to largely cancel out the calculated safety benefits. It will also be important to clarify how land use redevelopment opportunities and imperatives should be included in transport project assessments.

Page 23, paragraph 153	We support evidence-based and mode-neutral solutions for delivering the best transport solutions to deliver safe and accessible transport outcomes. However, a number of our practitioners would welcome further guidance at a national level on what exactly is 'best' (or 'good') practice.
Page 24, paragraph 164	While the aims of integrated land use and transport planning are very desirable, we note that the current District Plan and RMA approach is cumbersome and slow to change to best practice for these areas (e.g. subdivision designs that encourage more use of sustainable transport modes). It also results in considerable inconsistency in practice between local authorities. A more flexible approach to reviewing and implementing District Plans (and other related standards), so they align with current national safety and accessibility aims and best practice, would assist local Government to contribute to the objectives of this GPS. One option could be to consider the development of relevant National Policy Statements on transport matters.
Page 25, paragraph 165	We would suggest that central government (through its agencies) also has a role in ensuring that appropriate understanding of and skills required for integrated land use and transport planning are provided for the industry, e.g. adequate industry training where both transport engineering and land use planning concepts are taught together.
Page 31, paragraph 181	It is not entirely clear what is the distinction between the "rapid transit" and "transitional rail" categories (Table 3 doesn't really help to elaborate on this).
Page 31, paragraph 184	Although we appreciate that the release of the 2018 Budget and the 2018/21 NLTP will expand on details, at present the GPS provides very little guidance about the relative distribution of funding regionally (especially by activity class). Other than a specific emphasis on Auckland transport issues, it is not clear what this GPS will mean outside of Auckland, in terms of investment levels or particular transport focus areas. There are only a few mentions of Christchurch and Wellington, and very little about anywhere else in New Zealand.
Page 32, Table 3	<p>We have some concern regarding the level of difference between lower and upper range funding levels for some activity classes. As one example, the lower range for walking & cycling funding is approximately 1.2% of the minimum expenditure over the first three years, whereas the upper range is 2.8% of the maximum expenditure in the same timeframe – more than twice the value. Similar large proportional ranges exist for local road improvements and rapid transit activity classes. In contrast, the differences in proportion between lower and upper ranges for state highway improvements and road safety promotion are much smaller (albeit the absolute range for state highway improvements is still relatively large).</p> <p>While it is understood that greater volatility exists for the funding needs of the generally smaller, local government-led projects in some of these activity classes, and that projects in the new rapid transit activity class have uncertain approval timeframes, we consider that achieving only the lower ends of the proposed ranges would result in the GPS objectives not being implemented. As such, more ambitious lower ranges would be welcomed (balanced if necessary by reducing the upper ranges somewhat). As a Group we encourage aiming for the higher end of some of the new activity class ranges to help achieve these objectives, and are happy to assist you in identifying how to develop and implement the appropriate programmes.</p>

	<p>We note that several definitions refer to <i>“improving the capacity or level of service”</i> or <i>“delivering an appropriate level of service”</i>. “Level of service” traditionally has a connotation related to traffic efficiency and delay. Given that this GPS has squarely put safety first and foremost, there may need to be a clear definition of what is meant here by level of service or, better yet, explicit inclusion of the term “safety” in the relevant definitions.</p> <p>While rail crossing improvements were identified earlier in the document as a priority safety investment (paragraph 35), it is not clear which activity class(es) would fund these.</p> <p>Under “Investment management” it is not clear what proportion of the indicated funding would be allocated to sector research; there is also no mention of data collection and monitoring or sector training, which presumably would also be covered by this activity class.</p>
Page 40, Funding land transport	<p>It is surprising that this section does not seem to acknowledge the important role that road tolling and congestion charging could play in both funding transport and also assisting with demand management. As a greater proportion of motor vehicles become more fuel efficient (including electric and hybrid vehicles), the means to substitute traditional fuel excises with road user charges will also become more critical and warrants some discussion here.</p>
Page 40, paragraph 204	<p>We support investigation into the potential for value capture mechanisms for transport funding; this has been a common tool used overseas for the likes of Transit Oriented Development and would be of great interest to some local authorities.</p>

Thank you again for the opportunity to comment. Please contact us if you have any questions.

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