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Dear Martin

Submission from Greater Wellington on the Ministry of Transport's GPS 2012 Engagement Document.

Introduction

Greater Wellington welcomes the opportunity to provide feedback to the Ministry of Transport (the Ministry) on the proposed direction of the next Government Policy Statement on Land Transport Funding (GPS 2012).

We note that the Ministry is seeking views on the proposed direction of the GPS 2012, together with design of the GPS document in terms of structure and information provided.

Overall direction

The intention to broadly continue the overall direction set by GPS 2009 in the next GPS is noted.

Greater Wellington does not oppose the three priorities identified for GPS 2012:

- A strong and continuing focus on economic growth and productivity
- Value-for-money
- Road safety

However, in relation to the first bullet point, we note that investing in State Highways is not the only way to drive economic growth. Investing in good public transport systems in New Zealand's key urban centres, for example, is also crucial in terms of contribution to economic growth and productivity.

Statement of strategic direction

The proposal to provide a statement of strategic direction which sets out the current government's overall vision for the sector is welcomed as it provides some indication of the government's longer term view for the transport sector.

The Forward Plan for Transport, specifically mentioned in the GPS 2012 Engagement Document, will be a useful and we look forward to the details being released. This may provide much needed guidance about how longer term transport issues are to be addressed given that the NZTS 2008 developed by the previous government has minimal weight.

Greater Wellington notes that the proposed new vision for the transport sector does not reflect some important transport issues that the GPS is required to contribute to under the Land Transport Management Act 2003 – namely ‘affordable’, ‘integrated’, ‘sustainable’. We suggest that these are critical considerations for development of the transport network. In relation to this, we are concerned about the future level of commitment and funding for many important programmes under the previous activity class ‘Demand Management Community Programmes’ under the next GPS.

There remains an absence of any National Land Transport Strategy (NLTS) with statutory weight under the Land Transport Management Act 2003. Development of a NLTS would provide a consistent strategic direction to the transport sector, despite changes in government, with a clear link to the relevant legislation. This is important given the long lead in times for transport projects and the need for long term planning.

Short-medium term focus

The intention to remove the specific short term emphasis on using transport investment (State highway construction programme in particular) to provide additional economic stimulus is noted.

We believe the short to medium-term economic stimulus provided by increased expenditure on the state highway programme in the GPS 2009 is over-stated. Now that the National Land Transport Fund is fully hypothecated, approximately \$3bn is now invested in New Zealand’s land transport network annually. Distributing this funding to progress local, regional and national transport projects will inevitably create jobs. These jobs will exist regardless of what activity class they are connected to.

Roads of National Significance

The Engagement Document notes that the GPS 2012 will have a continued focus on investment in the seven RoNS identified in the GPS 2009. Greater Wellington is not opposed to continuing the momentum towards implementation of these RoNS, however we note that investment in RoNS is only one way of contributing to economic growth and productivity. Investment in public transport, walking and cycling is another important contributor, particularly in large urban centres like Wellington.

While no new RoNS are proposed to be announced in the GPS 2012, the Engagement Document states that the draft State highway classification paper has identified four high value highways, parts or all of which could be possible future RoNS. We do not support the state highway classification being used to identify and justify future RoNS. This was reflected in the submission on the proposed state highway classification system from the Wellington Regional Transport Committee which highlighted concerns about the purpose of the classification system and suggested it should be limited to an asset management role. Using the state highway classification system to identify RoNS would exclude key local roads and, due to the proposed classification criteria, would not give

appropriate weight to rural state highways. A more robust, network wide approach is needed to identify any future RoNS.

In addition, it would be prudent to wait until the current identified RoNS have been fully implemented, so that the impact and level of success of these projects can be assessed, prior to identifying or committing to any future RoNS.

Road Safety

The proposal to make more explicit the full extent of infrastructure investment in road safety is noted and supported, although how the target expenditure for safety related roading investment will work in practice will require some further explanation.

While it makes sense to acknowledge and understand the proportion of road improvement and road maintenance investment which has a road safety contribution, this should not be used as a basis to reduce investment in funding available for important road safety education and awareness programmes which need to be well supported as part of the Safer Systems approach in the governments *Safer Journeys* strategy.

Also, while we support the focus on road safety investment to address areas of high concern highlighted in the Safer Journeys strategy, increased investment to make cycling safer is crucial to ensure that this is a safe, as well as an affordable option.

Canterbury earthquake

The costs of reinstating the State highway and local road network following the Canterbury earthquakes (around \$360-\$470 million) and the likely impact on the 2012-15 NLTP are acknowledged. We support prioritisation of funds towards these necessary repair works and note that some of this funding will come from existing emergency works provisions within the NLTP and some from reprioritisation of expenditure. As a result, it is acknowledged that some non-urgent planned projects may be delayed and that this will be a consideration during development of the next NLTP. When prioritising which activities will be affected, we ask that sufficient priority be given to ensuring our existing networks can be safely and adequately maintained.

Impacts

The Engagement Document notes that the 'impacts' sought by the government GPS 2009, from investment in land transport through the NLTP, will continue in GPS 2012. These are:

- Improvements in the provision of infrastructure and services that enhance transport efficiency and lower the cost of transportation through:
 - improvements in journey time reliability
 - easing of severe congestion
 - more efficient freight supply chains
 - better use of existing transport capacity.
- Better access to markets, employment and areas that contribute to economic growth.
- A secure and resilient transport network.

- Reductions in deaths and serious injuries as a result of road crashes.
- More transport choices, particularly for those with limited access to a car where appropriate.
- Reductions in adverse environmental effects from land transport.
- Contributions to positive health outcomes.

It would be useful if the GPS 2012 could demonstrate the contribution and links between the three priorities for investment at the front of this engagement document and the above ‘impacts’ sought from investment.

As stated earlier, we are concerned about the apparent lack of ongoing commitment to important programmes, such as travel planning, which contribute positively to a number of the above impacts. For example, these programmes are aimed at more efficient use of the existing transport network, improving road safety, providing more transport choices, reducing environmental impacts of transport, and contributing to positive community health outcomes.

Funding allocation

The GPS 2009 set out funding ranges (ie. a minimum and maximum allocation) for particular activity classes. It would be useful for this national picture of funding for each activity class was broken down to provide a regional picture. This would assist with preparation of Regional Land Transport Programmes.

We note that changes will be made to the funding allocation in the out years of the GPS 2009 in the upcoming GPS 2012, with the aim of improving focus on value for money. We have the following feedback on the summary of proposed funding allocations:

- Greater Wellington welcomes the opportunity to align the New Zealand Cycle Trail Network Expansion Project with GPS 2012 by reflecting it in the descriptions of the State highway and local roading activity classes. This would allow for funding to be obtained for improvements to sections of the New Zealand Cycle Trail project that would have mutual commuter and recreational cycling benefits via the standard land transport funding processes.
- We do not support the reduction in expenditure in GPS 2012 on the ‘road user safety’ activity class. Many programmes that sat under the former ‘Demand Management Community Programmes’ activity class have significant road safety benefits. As set out earlier in this submission, we consider that complementary road safety education and awareness programmes are an important part of the safer systems approach, and a reduction in this activity class would seem to be counter to safety related infrastructure investment elsewhere in the GPS, particularly at the local level.
- In relation to the public transport infrastructure and public transport services activity classes, we note the rationale for increased allocation relates to changes in rail funding structures and in metro rail systems. We note that the terms of the recent Wellington Rail Package agreement includes a commitment from government to set the funding range for the public transport activity class so that NZTA can provide funding support to Greater Wellington to meet the agreed share of the shortfall in ongoing operational funding for the passenger rail

services. This should be reflected in any future regional breakdown of the numbers for activity classes.

- We would like to see a further increase in the upper expenditure limit for the public transport services activity class to reflect the importance of improving and increasing the capacity of public transport services, including bus services, to address traffic congestion and provide an affordable alternative travel option.
- We support the \$3million increase in the upper band for walking and cycling from 2012/13 onwards as proposed in GPS 2009. However, we seek a further increase in this upper band to ensure that the important walking and cycling improvements identified through our local and regional plans and programmes with demonstrated benefits have a good chance of receiving funding subsidy through the NLTP to support growth occurring in these modes and to increase safety.
- We are concerned about the significant reduction in the transport planning activity class. The need to be more efficient in these activities by removing unnecessary planning and reducing duplication is acknowledged. However, there are several statutory planning processes, including regional strategies and programmes, which are required of regional councils as a result of the latest LTMA amendments. Sufficient resources are needed to undertake these planning processes. In addition, funding for all Transport Models (other than those held by NZTA) are funded out of this activity class. The proposed cuts to this activity class may mean that analysis not being conducted by NZTA is severely curtailed.

R -funding

The engagement document states that Ministry Officials are currently developing future funding mechanisms for any future continuation of R-funding (regionally distributed funds). We encourage the Ministry to involve relevant regional council officers in this work.

Conclusions

Greater Wellington is generally supportive of the three priorities identified by the GPS 2012 for our land transport sector over the next three years. However, the GPS 2012 should better recognise the contribution that good public transport provision has towards economic growth, particularly in New Zealand's large centres such as Wellington.

Given the over-riding direction for transport set out in the Land Transport Management Act and in the 'impacts' the government seeks from investment, we believe that a greater commitment should be given to funding safe and sustainable transport through community demand management programmes.

Greater Wellington does not support the proposed reduction in the road user safety activity class, as we believe this is crucial to complement road safety infrastructure investment. Nor do we support the significant reduction in the 'transport planning' activity class, as it may affect the region's ability to deliver statutory planning processes and other important multi-modal strategic studies and modelling analysis.