

## **Wellington Regional Transport Committee**

### **Submission on the Draft Government Policy Statement on Land Transport 2018/19 – 2027/28**

28 March 2017

#### **Introduction**

The Wellington Regional Transport Committee (RTC) would like to thank the Ministry of Transport for this opportunity to provide feedback on the Draft Government Policy Statement on Land Transport 2018/19 – 2027/28 (Draft GPS 2018).

#### **Key points**

This submission identifies particular areas of support, as well as changes that the RTC would like to see made to the Draft GPS 2018. The key points in our submission are as follows:

- One transport system approach – The RTC fully supports this integrated approach but the Draft GPS 2018 does not provide the mechanisms to make this happen efficiently or effectively. The balance of objectives and funding are unevenly weighted, for example, the emphasis is still heavily geared towards road investment, particularly state highways. The ‘silo’ structure of the activity class framework does not encourage integrated planning, and better provision in the activity classes is needed to enable multi-modal, multi-agency programmes particularly in the areas of travel demand management and network optimisation.
- Weighting of objectives – The lower priority that has been given to two of the six national land transport objectives, those concerning the provision of appropriate transport choices and mitigating the effects of land transport on the environment, is not supported. All six objectives should be equally important. Although additional funding for walking and cycling is welcomed, there is insufficient attention given to walking in the objectives.
- Public transport – While the increased funding is welcomed, the Draft GPS 2018 downplays the important role of quality public transport in supporting economic growth, improving efficiency and optimising the transport system, particularly in urban areas. The RTC also remains concerned that the ability to deliver high quality and integrated public transport services is constrained by the inability to fund rail infrastructure through the NLTF.
- Resilience – The RTC supports the increased focus on resilience but it needs to encompass a broader perspective, including longer term impacts and trends such as climate change. A specific activity class for resilience is recommended.

- Local road investment – The RTC does not support the reduced funding allocated to the local road improvements activity class as we believe that there are reasons for the underspend related to the funding criteria that need to be investigated and resolved before any decisions are made regarding the level of funding.

## One transport system approach

The RTC fully supports the ‘one transport system’ approach as this is in line with the approach taken in the Wellington Regional Land Transport Plan 2015 (RLTP). A multi-modal, integrated package of solutions that effectively support economic growth and community wellbeing is key to delivering the strategic vision for the region. This includes providing *a high quality, reliable public transport network and an attractive and safe walking and cycling network*, as well as *a reliable and effective strategic road network*. This also means ensuring the Wellington region has *a well planned, connected and integrated transport network and an efficient and optimised transport system that minimises the impact on the environment*.

The RTC has strong concerns that the ‘one transport system’ approach will not be able to be delivered in practice due to the balance of funding set out in the Draft GPS 2018. Funding is still heavily weighted towards road investment, particularly state highways and this is despite the Draft GPS 2018 clearly stating that in order to achieve value for money (one of the three strategic priorities) investment needs to get the best use out of existing assets. While some investment in roading is necessary particularly for safety and resilience reasons, the balance of funding does not adequately recognise the important role of public transport, active modes and travel demand management as part of an effective and optimised transport network.

There is also concern that the ‘silo’ structure of the activity classes framework does not encourage the integrated multi-modal planning needed to support and enable the one transport system approach. The activity classes need to make better provision for multi-modal, multi-agency programmes particularly in the areas of travel demand management and network optimisation. We also note that despite significance reference to emerging technologies, many of which may be employed to optimise the transport system, it is not clear how the activity classes will allow these to be funded.

We welcome the guidance in the ministerial expectations for the NZ Transport Agency regarding the need to “work collaboratively with the transport sector” and “encourage integrated network planning”. We agree these are crucial to ensuring a one transport system approach. The alliance that was formed to deliver the Mackays to Peka Peka Expressway, involving the NZ Transport Agency, the local authority (Kapiti Coast District Council) and contractors, is a good example of this collaborative approach and resulted in a number of wider positive outcomes around community engagement, safety, integration with other transport modes and environmental management.

The RTC **recommends** a shift to a more balanced and multi-modal funding allocation within GPS 2018, recognising the important role of public transport, active modes and travel demand

management as part of an effective and optimised transport network, possibly via a more area-based approach to funding activities.

## **Weighting of objectives**

The RTC does not support the lower priority given to two of the six national land transport objectives and questions the lack of explanation for giving unequal weighting to the objectives. The Draft GPS simply states that the objectives concerning the provision of appropriate transport choices and mitigating the effects of land transport on the environment “have less focus” but it is not clear why. There are concerns about the impact this prioritisation will have on progress towards a ‘one transport system’. The provision of transport choice is an essential part of achieving a resilient and efficient transport network, and mitigation of environmental effects should be an important priority given that the transport sector accounts for nearly 20% of domestic greenhouse gas emissions in New Zealand and is the highest emitting sector after agriculture. Environmental effects can also be addressed through positive initiatives such as electric cars and low emission public transport vehicles. The RTC would like to see all six objectives given equal importance.

The additional funding provided in the walking and cycling improvements activity class is welcomed by the RTC. There are several key cycleway projects in the Wellington region that can be progressed using this funding allocation and will assist in achieving our key strategic objective of *an attractive and safe walking and cycling network*. However, we are concerned that insufficient attention has been given to walking in the objectives. The long and short term results are limited to cycling only and there is a concern that this will impact on the ability for walking infrastructure projects to be funded. It may even influence whether walking is considered as part of wider projects, such as connections to public transport and providing paths adjacent to highways.

Virtually every journey begins and ends with walking and the importance of this mode cannot be ignored, particularly in areas such as Wellington City which has New Zealand’s highest proportion of journey to work trips that are made on foot (21% based on 2013 Census data). Furthermore, as our population ages, walking will also become an increasingly important mode of transport across the region, requiring high quality infrastructure.

There is also a concern about the lack of funding for cycleways outside main urban areas and the impact this will have on cycle networks in other areas that are not eligible for Government subsidies.

It is noted that reporting measures are not included in the Draft GPS. Without these, it is hard to understand how the short to medium term results will be assessed and how this will shape investment decision making. For example, the short to medium term results for the Economic Growth and Productivity priority include: “Public transport is provided where there is sufficient demand”. It is unclear what is meant by “sufficient demand” and what metrics will be used to determine the level of demand.

The RTC **recommends** that all six national land transport objectives are given equal importance, including provision of appropriate transport choices and mitigating the effects of land transport on the environment.

The RTC **supports** the additional funding provided in the walking and cycling improvements activity class.

The RTC **recommends** that greater emphasis is placed on walking in the objectives and the results, and that reporting measures also include walking.

## **Public Transport**

The Wellington region has a high-quality, well used public transport network of bus, train and harbour ferry services and one of our key strategic objectives is to provide *a high quality, reliable public transport network*. The rail network accounts for around 45% of journey to work trips from local authority areas other than Wellington City to destination workplaces within the Wellington CBD, highlighting the importance of the rail network as a means of transporting people to/from the Wellington CBD and taking pressure off the strategic highway network. The ongoing investment in public transport is welcomed by the RTC but it does not go far enough, particularly when compared to the funding allocated for roading.

The Draft GPS 2018 downplays the important role that quality public transport performs in supporting economic growth, improving efficiency and optimising the transport system, particularly in urban areas. It is also virtually silent on the role that public transport can play in reducing emissions. The references to public transport throughout the Draft GPS seem to suggest that it is a secondary mode of transport that should only be invested in if sufficient demand already exists. This contrasts with the GPS's statements in respect of roading, where investment is strongly encouraged to enable growth despite the acknowledgment that benefit cost ratios for state highway improvements have been diminishing.

Public transport is so much more than simply “a transport choice for those without private vehicles”. This type of wording does little to support or encourage an uptake in public transport and is not an accurate reflection of public transport users. Public transport (including buses, trains, ferries and light rail) is an extremely efficient mover of people and therefore plays an important role in addressing traffic congestion, achieving liveable cities, supporting an efficient transport network and contributing to economic growth and productivity. It will also play an increasingly important role in supporting New Zealand's ageing population which is likely to lead to more demand for public transport.

Reference is made in the Draft GPS 2018 to the lack of growth outside Auckland and Wellington in public transport use. Public transport patronage is very much a reflection of the services available and how it is integrated with the rest of the transport network. The RTC notes that in the cycling area, investment in networks is being explicitly used as a means of creating user growth. We therefore question why this investment approach is not also being applied to stimulate public transport growth across other centres in New Zealand.

The RTC remains concerned that the ability to deliver high quality and integrated public transport services is constrained by the inability to fund rail infrastructure through the NLTF. Separate funding for rail undermines the ability to efficiently plan and deliver an integrated one transport system approach. Under the current approach, rail capital works on KiwiRail network infrastructure that are critical for the reliable running of commuter rail services are not included in the NLTP.

In the Wellington region's Hutt Valley, all of the partners involved in the State Highway 2 (Ngauranga to Te Marua) Programme Business Case concluded that public transport and particularly rail improvements were an essential part of the solution for addressing the problems along this corridor including congestion, as well as facilitating growth. Delivering these solutions will be much less efficient, and ultimately more costly overall, than it should be because the public transport improvements are reliant on some significant infrastructure improvements to the rail lines. Negotiations with KiwiRail are required to make this happen, but the necessary infrastructure works are a lower priority for Kiwirail due to their focus on freight rather than passenger services. This disconnect makes it very difficult to deliver and maintain high quality passenger rail services.

We also wish to question the guidance in the ministerial expectations regarding the NZ Transport Agency taking a lead role in securing prudent activity management in public transport. The region's local authorities undertake activity and asset management planning as part of our responsibilities under the Local Government Act 2002 and are set out in our Long Term Plan.

The RTC **recommends** that the role and benefits of public transport are more clearly outlined in the GPS, recognising that public transport is an extremely efficient mover of people and therefore plays an important role in addressing traffic congestion, achieving liveable cities, supporting an efficient transport network and contributing to economic growth and productivity as part of the one transport system approach.

The RTC **recommends** a substantial reallocation of funding within the activity class framework in order to reflect the important role that public transport performs in the transport system.

The RTC **recommends** that the Government review the funding of passenger rail infrastructure, recognising that the delivery of high quality and integrated public transport services is constrained by the inability to fund rail infrastructure through the NLTF.

## **Resilience**

The identification of resilience as one of the six national land transport objectives in the Draft GPS 2018 and its identification as a priority is supported by the RTC. Providing *an increasingly resilient transport network* is a key strategic objective for the Wellington region. The need to address resiliency now and for future users is a very real and pressing one.

As set out in the RLTP, a resilient transport network is one which is designed, developed and maintained to recover quickly from unplanned events. A transport network may be affected by both ‘High Impact Low Probability’ events and ‘Low Impact High Probability’ events. These may be natural hazard events ranging from a slip or surface flooding, through to a major earthquake or tsunami. Crashes that occur on the road network may also result in disruptions as a result of lane closures or an entire corridor being temporarily out of use. Another aspect of transport network resilience is the need to be adaptable to potential future changes in climate patterns, sea levels, travel demands, technologies, fuel types, and lifestyles.

It is this latter resilience element that we do not feel has been adequately addressed in the Draft GPS 2018. It is often the slower incremental threats to the network that are overlooked and it is critical that these be factored into our planning. It will be difficult to achieve this under the Draft GPS 2018 approach to resilience which focuses on identifying and remedying critical points on the network.

The RTC would strongly support a specific activity class for resilience to encourage and enable a focused investment approach to this important priority.

The RTC **recommends** that greater emphasis is given to longer term impacts and trends such as climate change.

The RTC **recommends** that a specific activity class for resilience activities be introduced.

## **Local road investment**

The RTC does not support the reduced funding allocated to the local road improvements activity class. The rationale suggests this is due to underspending and we question if the reason behind this has been adequately investigated as it may be an indication of difficulties meeting the funding criteria rather than a reduced need for funding. We understand some local councils face difficulties raising their local share, particularly with pressure to keep rates increases to a minimum. We are concerned that those councils that are fully utilising this budget will be penalised by the reduced funding allocation. We also note the new definition for the activity class is focused on creating new local assets which is not in line with the value for money objective requiring investment get the best use out of existing assets (as mentioned earlier).

The RTC welcomes the additional funding provided in the local road maintenance activity class which is essential to support the implementation of the ONRC. However, we note that the public has not yet had an opportunity to comment on ONRC customer levels of service and the implications it will have on their local roads. We also envisage a greater effect on local road maintenance arising from the uptake of High Productivity Motor Vehicles by the transport industry. The increased use of these vehicles has been very successful and improved transport efficiency. However, the greater vehicle mass means assets are deteriorating at a faster rate than anticipated and the renewal needs of roads and bridges is increasing in turn.

The RTC **recommends** the reasons for underspending in the local road improvements activity class be fully investigated before any decisions are made regarding the level of funding.

Thank you once again for the opportunity for the RTC to provide feedback on the Draft GPS 2018.