



Submission on the Draft Government Policy Statement on Land Transport 2024

2 April 2024

Parents for Climate Aotearoa is a group of parents and whānau, speaking up for our children's future in a rapidly warming world.

We are very concerned for those already marginalised and without a voice in our society. These people are vulnerable to the consequences of climate change and poorly thought out mitigation measures. Our lack of urgency and action today will be felt by our children tomorrow. Many people, particularly women and children are hurting today around the world, from the consequences of climate change.

Therefore, we make the following recommendations and comments:

Transport Emissions

The timeframe of the draft GPS is a crucial time for mitigating climate change and limiting its adverse effects. By reducing our transport emissions we could mitigate climate change, limit its adverse effects AND improve human health. With all these co benefits, many proven low-cost ways to reduce transport emissions, and the potential for further innovation in our transport system, it makes sense for both our economy and environment.

And yet, this plan makes no attempt to meet existing emissions reduction goals nor to introduce new innovations to adapt our transport system to a changing world. Instead, it returns to a cars-first approach that has been proven time and time again to increase emissions, increase congestion, and increase cost.

This plan is not in keeping with our Paris Agreement obligations or our emissions reduction budgets. Transport is one of the few sectors where emissions are still rising in New Zealand. The transport sector must do its bit to reduce emissions to meet our climate goals, not make those goals harder. This requires a range of policies and plans, that supports everyone to take up the options of low carbon transport, including electric vehicles, public transport, walking, scootering and cycling. Emissions reductions cannot be left up to the Emissions Trading Scheme (ETS) alone, as this will result in much higher prices for everyone. Furthermore, the ETS in its current form will not do this until it has further reforms as the Climate Change Commission has recently outlined in their advice.

Our Vision for Transport

Our vision is an Aotearoa where safe, low-emissions, convenient transport options are available to everyone. This requires a network that considers and caters to a wide range of diverse people, including tamariki and rangatahi who deserve independent travel, disabled people who have a wide variety of transport needs not well-served by a cars-only approach, elderly people who may not be able to drive and rely on public transport options, and families who come in many shapes and sizes and a host of different transport requirements at different phases of their children's lives.

We want to see our children grow up in a liveable and climate friendly society that is fully accessible and inclusive in every sense of the word. We want to see a well thought out, connected transport system that increases and prioritises walking, cycling and use of public transport. We would like to see the needs of families, disabled and elderly people centred. When our most vulnerable peoples' needs are met, then all our needs are met.

To achieve this, we must not build more roads, unless they are for resilience purposes, when all other options have been exhausted. At present, more roads and lanes will lead to more vehicles and more emissions.

We see reducing the number of cars on the road, at the same time as increasing active and public transport as the best way forward for transport in Aotearoa. When we have less cars, there is no need to build more roads, there is less pollution and emissions, less congestion, less network maintenance, more efficient freight, and improved safety outcomes for everyone. Our trucks and trade vehicles can move around our roads more efficiently.

Strategic Priorities

As you can see, our vision for transport in Aotearoa is completely at odds with the strategic priorities outlined in the draft GPS. We are baffled as to how a transport plan in 2024 can mention climate only twice and barely touch on how the changes might affect our collective emissions and climate goals. Surely we can do better than that when reducing emissions from transport is one of the most impactful things we can do as individuals and as a nation to meet our climate commitments

Economic Growth and Productivity

We strongly disagree with the idea of building a transport plan only around economic growth. Our transport network is a public good, and as such should focus on people, not only economic growth and productivity. The health of an economy is only as good as the health of the community and people.

So many of our roads are unsafe, particularly for our tamariki. As parents we waste so much time, money and worry on trying to mitigate these risks. We have to drive our kids to school, because there are not enough safe routes and crossings. And the resultant school traffic slows everybody down. Many of our families have seen the benefits of safer streets around schools and how it has improved families lives, saved time and given our tamariki more freedom.

The cost of air pollution also takes a big toll on families, the health system and the economy. Adding more cars and trucks to our transport network will make this worse, until most of our vehicles are decarbonised.

Instead of this narrowly-focused strategy, we believe that great results for our nation would come from putting people at the heart of our transport planning. A people-focused transport network would measure success by looking at access, equity, and safety, not by productivity.

We encourage the government to revisit the strategy with a more holistic and balanced view of the costs and benefits of transport.

Roads of National Significance and Roads of Regional Significance

We strongly disagree that the so-called Roads of National Significance will boost economic growth and productivity on a national level. Where there are small local benefits, these are easily outweighed by the costs in terms of carbon emissions and kids' safety.

There may be short term boosts to some construction companies and consultants, though unlikely to have wider community benefits. We have seen throughout the country where new roads are built, there are short term reductions of traffic, then long term increases as people live further from work, such as in Nelson/Tasman, Christchurch, Wellington and Auckland.

Building large expensive roads in a few locations is unfair for the regions that struggle to keep their roads open for their communities and businesses. This lack of reliability has significant consequences for their communities and local economies. We have a limited transport budget and a key priority should be to maintain what we have adequately, are resilient enough and fit the needs of their communities. Most of these roads proposed of significance are at best a nice to have and worst will be gold plated stranded assets not fit for the needs of our future generations and economy.

Our current system is not equitable and safe, and new roads will not change that. The requirements to build new roads should be stringent, and we should not be able to bypass these requirements by declaring a connection "nationally significant". Instead we should be maintaining our existing network and only building new ones where roads can meet a narrow criteria of building resilience (i.e. to better face natural disasters) and adapting to climate change, such as sea level rise. Our councils are already struggling to afford to maintain our current network, and this will only get more challenging as temperatures rise, our climate becomes more volatile, and extreme weather events become more frequent.

Rather than looking at the high-cost, high-carbon four lane highways described as Roads of National Significance, we should be looking to create Roads of Regional Resilience. We should not prioritise small gains in travel time, but should prioritise a resilient network that allows regions to recover quickly after disasters.

There needs to be a serious discussion and consideration of negative effects and unintended consequences of these roads. What impact will these roads have on public health? What impact will they have on community facilities and quality of life for the surrounding communities? What is the impact on our emission reduction budgets and National Determined Contribution under the Paris Agreement? How will this impact our communities' ability to adapt to a warming world? Will these roads lead to more roads needed in 5, 10 years time?

Public Transport

Public transport is one of the most equitable and cost-effective investments we can make in transport. By using less space and less energy to move people around our towns and cities we can reduce congestion and emissions, making our streets more pleasant and efficient for everyone.

We support investment in public transport but disagree that a narrow set of high-cost projects is the best way to improve our national public transport offering. By focusing on just a few projects in two cities, many miss out.

Families all around Aotearoa deserve great non-car options to get to where they need to go and many councils around the country have recognised this with public transport investments that have delivered real change in many smaller cities for a fraction of the cost of the projects supported by this GPS. For example, The Tide frequent bus service in Whanganui, Nelson Tasman's eBus fleet, and Palmerston North's new bus service. These services all focus on increasing patronage and have shown great results. Our existing bus services funding needs to be maintained, supported and increased.

The narrow focus is also apparent when it comes to our rail network, which is a real missed opportunity. Rather than cutting funding to Te Huia, we should be looking at ways to deliver rail as a real transport alternative for people and freight in many areas of the country. Train travel allows people to make better use of their commuting and travelling time, is one of the safest ways to travel, and reduces congestion on our roads. It also reduces wear and tear on our roads, reducing the road maintenance burden.

Road Maintenance

Yes, we need to be looking after the roading network we have, and there's quite a lot of work to achieve that. But alongside that maintenance, we need to be finding ways to make our network more resilient and reducing the need for maintenance. Improving our resilience to weather events should be a much higher priority than building any new roads, which will only put more pressure on the maintenance budget.

To make the most of our road maintenance budgets, we can also reduce the need for maintenance by reducing wear and tear on the roads in the first place. We can reduce wear and tear on our roads by reducing the numbers of heavy trucks on our roads with rail and coastal shipping, and by reducing the number of vehicle movements by providing other transport options. Wet weather is another contributor to road damage, and if we proceed with this plan, climate change will mean more wet weather, more potholes, and less ability to fix them.

We cannot fix our way out of the damage caused by allowing super heavy trucks on roads that were not built for them, and nor should we try to. Instead, we need some root cause and systems-thinking to overcome the many challenges of road maintenance, and in its current state this plan displays neither.

Road Safety

Our kids deserve safe streets, but police enforcement alone is not the way to achieve this, especially with such a narrow focus.

Safety for our tamariki requires lower speeds and better infrastructure, not just policing. Many of our parents tell us that they prefer the lower speeds on both the open road and urban areas. 80km speed limits have made a big difference to feeling safer on our busy roads and make it easier to navigate intersections. There have been fewer crashes and fatalities. We believe the silent majority support slower speeds, particularly in our regions and around our schools.

Many of our families also enjoy the various traffic calming, cycling, and walking projects that have been delivered in their communities. One mum talks of the cycle path near her home as the gateway to being able to shift how she takes her children to school and how she travels to work.

Separated infrastructure is there all the time and does not rely on policing to improve safety. This kind of infrastructure also reduces the negative impacts of distraction, which is a key contributor to many accidents.

Another key safety factor reported by many parents but ignored by this plan and much of our transport planning is visibility from poor parking and increasingly large vehicles. We all want kids to have the option to be able to walk or bike to school safely, but with increasing road traffic and larger vehicles that have grills taller than children, this is increasingly challenging. Add to that the lack of crossing points and high speeds, it's no wonder that so many families decide they have to drive (and increase school traffic, and make our roads less safe... it's a vicious cycle!)

Traffic Fines

We agree that traffic fines could be reviewed, and in our view this review should focus on better aligning fine levels with the severity and potential safety outcomes of different offences.

We also believe this review could use some sort of a sliding scale to make these fines more equitable. By setting traffic fines at one set level for all, we end up with a system where fines are often not a sufficient deterrent to people who are wealthy, and yet can completely ruin the lives of people living in poverty. This is not fair.

Vehicle Regulatory System

We also agree that our regulatory system could be improved, especially in regards to improving the safety of people outside the vehicle.

A focus on protecting people within vehicles has led to rapidly increasing vehicle sizes. Large vehicles, especially taller vehicles are far less safe for people walking, in wheelchairs, on bikes or scooters. By focusing on safety for everyone on our streets, we could vastly improve the overall safety performance of our vehicle fleet.

Value for Money

Value for money has a place in our transport planning, but we should not let it distract us from focusing on communities and people, safety for our kids, reducing emissions, and equitable access to transport options.

When considering what "value for money" looks like, it's fundamental to look at a broad range of long term costs and benefits as well as the short term. This is especially important when looking at infrastructure that will lock in emissions which will be very costly long term for public health, wellbeing and economy. For any major projects, we would expect to see very clearly laid out how

these costs and benefits relate to future costs related to climate change. The whole-of-life cost is crucial to limiting further stranded assets and cost to our future generations. To achieve this, we need to provide **clear direction and examples** for decision makers at all levels of governance.

The looming cost of meeting our NDC, needs to be part of the consideration of value for money in this GPS. The cost to future governments is potentially high and decisions made today will have an impact.

When you take this broad view, many of the Roads of National Significance won't stack up, whereas many of the projects this policy seeks to cancel do stack up.

Making the most of our existing land transport network

One way to see real value with less resources is to make the most of what we have already. We see this as a crucial element and must be the first consideration when considering investigating new roads or improvements. There are many opportunities to use our current networks better:

- Reallocating some existing road space to active transport infrastructure.
- Allowing local governments to directly influence travel behaviour, such as road user charging or congestion charging and use that money for improving low emission and accessible travel options.
- Incentivising car-share schemes and ride sharing that reduce cars on the road and increasing passenger numbers.
- Keeping the reduced speed limits on all urban roads and closing through roads.
- When a new road or more lanes are proposed, alternatives, like increasing active transport infrastructure and public transport be **MUST** explored first.

Stated Outcomes

We want to be very clear that we do not believe this GPS will deliver most of the outcomes it seeks to deliver, and nor will it deliver the outcomes that are important to us like a livable future for our kids.

This policy will not meet the needs of our communities today or in coming years. It will take away options for many families and add costs.

Instead, we need a balanced approach that gives people options. Reduced journey times, reduced congestion, improved access would all be better achieved by providing for multimodal transport, including public and active transport. Focusing on private vehicle transport cannot achieve the goals we all share for a better transport experience for everyone.

Resilience Outcomes

This plan is not what resilience looks like. Resilience looks like reducing emissions and supporting all modes of transport. Resilience looks like many low-cost community-driven changes, not flashy and expensive projects. Resilience looks like caring for the people around us and providing accessible transport to everyone. Resilience looks like a set of national and regional plans to adapt our transport network to reduce emissions and adapt to climate change impacts. Resilience looks

like looking after all our regions, which are important to our national economy and export earnings, with reliable road, rail and shipping networks.

Safety Outcomes

This plan will not reduce deaths and serious injuries, quite the opposite.

This plan is very worrying for safety and public health. Everyone makes mistakes sometimes and a transport network that continues to make improvements that follow best practice and science will help minimise the costs of those mistakes (like kids crossing a raised crossing, instead of a flat crossing).

Value for Money Outcomes

There is a lot that can be done to our road networks before new roads are needed. These changes might include interaction changes; how traffic merges; focusing on providing more good options for short trips and commuting; increasing the number and connectedness of pedestrian and cycling/scooter/mobility scooter pathways.

Some areas already have plans for this that have gone through consultation, such as Richmond in Tasman, where through the consultation process the Hope Bypass would be an option in the future after other options had been worked through. Also the people of Wellington have decided on NOT having a second car tunnel through Mt Victoria through years of expensive consultation and planning. It is highly inappropriate for a government that values saving money, is now happy to waste years and expense of planning, consulting, policy making and undo democratic decisions already made.

Funding the GPS

Transport is expensive, and we understand finding ways to fund our transport plans is both important and challenging. However, we believe that it is irresponsible to increase the cost of driving without supporting people to use other options.

A more equitable approach would be to make both fuel taxes and road user charges more fair and represent the true costs of different forms of transport. In this manner, we could keep costs similar for most families, while also being able to fund transport improvements through additional funding from the heaviest and most damaging vehicles on our roads.

Increasing fuel excise duty (FED) and road user charges (RUC) could be seen as a motivator to reduce fossil fuel use. But a fixed rate tax is not an equitable way to achieve our goals, and we definitely don't agree with increasing these costs for families to fund this investment! This is extremely punitive for low income people and families who have very limited choices in transport and do not have the ability to shift to an EV. Applying RUC to petrol cars is highly inequitable, particularly to those reliant on these vehicles like shift workers, low income families and people who live far from work etc.

Activity Classes

When looking at the funding for different activity classes, it's clear to us that walking, cycling, public transport, rail all need far greater investment.

We also see many negative consequences of the comments stating that “no funding from this class can be used for walking and cycling/traffic calming”. When we look at transport as a system with many different parts, we can see that those activity classes bring many benefits, and to strictly delineate funding is to reduce the ability of local governments to make the change their communities want and need.

We are especially concerned about reducing funding for footpaths when every single person is a pedestrian at some point in their journey.

Large investment in active modes of infrastructure is very important to our families. We must rebalance the resources spent on roads for largely personal cars, with proper infrastructure for all active modes. Transport in NZ is a massive drain on our families resources, and private vehicles are particularly expensive. But many families do not currently have a better choice. The percentage of the population that would like to bike or walk for recreation and transport on urban streets and rural roads is much greater than the percentage that actually does walk and bike. This is why we should not make cycling/walking infrastructure funding dependent on a “proven number of people walking/cycling”. All over the world we have seen that improving walking and cycling infrastructure increases the number of people choosing those modes. There is absolutely no reason that New Zealand should be any different.

Many families have used public transport for the first time or used it more often with the reduction in fees and children going free. A number of councils have worked together or by themselves to improve buses in the last few years, with Waka Kotahi. They have made large investments and thisGPS will undermine this investment.

Ministerial Expectations

From the Statement of Ministerial expectation, we can see that the minister and our group share many goals for our transport system. We want road users to be safe. We want a system that delivers good value for us all. We want projects to be delivered quickly to create benefits for everyone.

But the way we would approach these goals is almost entirely different to the Minister’s approach. And we do not believe that the minister’s approach stacks up when it comes to safety, value for money, or resilience. When looking at transport from a whole system perspective, and when you include our national climate goals in the planning process, it becomes clear that the best way forward for our nation is to reduce car-dependency and deliver other options for families all around New Zealand. By doing so, we will achieve a more resilient system, reduce congestion and maintenance costs, and make our transport network safer and more pleasant.

Despite some good intentions, we respectfully believe that the minister has got it wrong this time and that in 2024 our nation’s transport strategy should look very different to what is presented in this document.

Summary

We encourage a complete rethink of this policy statement, because we must not further entrench the dominance of motor vehicles in the land transport system, and exacerbate the marginalisation of walking, cycling and other active modes.

We are very concerned the investment proposals in the draft GPS appear to place considerable weight on New Zealand's short term economic growth and, as such, will lead to underemphasis on social, cultural and environmental well-being. Proposed investments do not ensure equitable access for people who cannot or choose not to drive in private vehicles. The funding levels for the activity classes in the draft GPS will further entrench our reliance on road transport and the marginalisation of active transport. Without a more comprehensive shift away from a motor vehicle-centric land transport system, New Zealand's longer term environmental goals (in particular, its commitments under the Paris Agreement to reduce greenhouse gas emissions) will fail.

The level of funding proposed for walking, cycling, and public transport in the draft GPS does not adequately support the overarching purpose of improved social, cultural and environmental well-being, and improved liveability of places. Throughout the GPS there needs to be a far more integrated approach to achieving well-being. Without a much greater level of funding the GPS will not ensure that transport investment goes in the direction communities want, much less result in the necessary step change to reduce emissions. The GPS published in 2024 needs to be a document not just for 2024 and the following two or ten years, but a foundation for a genuinely integrated approach to well-being for the 21st century.

The co-benefits of active transport for health need to be explicitly recognised as this provides further justification for increased levels of funding in the walking and cycling improvements activity class. Physical inactivity contributes to a rapidly-growing taxpayer burden of non-communicable diseases such as diabetes, cardio-vascular disease and some cancers. Encouragement of active travel including cycling, walking and public transport is known to increase public health outcomes and reduce healthcare expenditure.

As a group, we are community members and transport users. We walk, we drive, we ride bikes, we catch buses, and we want to continue to have these different options available to us. But we are also ordinary parents standing up for climate action, to ensure all children have a liveable planet to thrive on. And for this reason, we advocate for a GPS that does more to reduce emissions, more to increase equity and accessibility, and more to make our network safer for all of our kids.

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