



Tuesday, 2 April, 2023
Ministry of Transport

Submission on the draft Policy Statement on Land Transport 2024-34

Thank you for the opportunity for Healthy Auckland Together (HAT) to provide a submission on the Ministry of Transport's draft Government Policy Statement (GPS) on Land Transport 2024-34

The primary contact point for this submission is:

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Ngā mihi,

A handwritten signature in black ink that reads "A. Woodward." The signature is written in a cursive, slightly slanted style.

Alistair Woodward

Chair of the Healthy Transport Working Group
Healthy Auckland together

About Healthy Auckland Together



Healthy Auckland Together is committed to improving Tāmaki Makaurau so that it's an environment where all people can live full and healthy lives. By working collaboratively, we want to make it easier for everyone to be active, eat better and maintain a healthy weight. Healthy Auckland Together is a coalition of more than 30 partners representing local government, mana whenua, health agencies, non-government organisations, academia and consumer interest groups.

Overview

Most New Zealanders need to move to meet basic needs such as access to food, income, and health care. This is a key function of our transport system.

The transport system also shapes in important ways the health of New Zealanders. This impact extends far beyond safety and injury. One in ten deaths in New Zealand, for instance, is due to air pollution – and two-thirds of these are caused by vehicle tail pipe emissions.

Transport is the number one opportunity for everyday physical activity for New Zealanders. Nearly 60% of New Zealanders get their exercise from walking – much of this in their neighbourhoods. Safety is important, but it is a subset of overall health and wellbeing. The lives that would be saved by cutting air pollution and increasing physical activity through the transport system add up to roughly ten times the deaths caused by road crashes.

Transport generates approximately 20% of all greenhouse gas emissions in this country. It is the leading cause of CO₂ emissions, which New Zealand has committed to cut to net zero by 2050. Unchecked, climate change will damage the health and well-being of New Zealanders, leading to an increase in death and disability caused by heat, severe weather events, increasing waterborne and infectious disease outbreaks, and reduced reliability and affordability of food supply.

Given the strong evidence connecting our transport system with the health of New Zealanders, we recommend that:

- ‘Inclusive access’ or ‘access to basic needs’ is retained as a key goal of the GPS.
- Health, and not just safety, is retained as a key transport goal of within the GPS.
- The GPS headlines the links between transport, climate change and health.
- Restrictions on “multi-modal” funding in activity classes be removed.

Responses to Consultation Questions

Strategic priorities:

Question 1. Do you agree with the strategic priorities and the direction?

No, there is currently too much emphasis on economic growth, and the notion of economic progress that is the basis of the GPS is flawed – it is unacceptably short-term and narrow. The transport system plays a key role in enabling New Zealanders to meet **basic needs** like access to food, health care, income, and social connection. Our transport system also plays an important role in enabling **New Zealanders to be physically active**. Nearly 60% of New Zealanders get their exercise from walking, for instance - much of this in their neighbourhoods using transport infrastructure built, maintained and paid for by our transport system. The burden of ill-health caused by our current car-dominated arrangements for transport matches the annual health impact of tobacco.¹ For instance, one in ten deaths in New Zealand is caused by **air pollution** – with 2/3 of this pollution coming from

¹ Randal E, Shaw C, McLeod M, Keall M, Woodward A, Mizdrak A. The Impact of Transport on Population Health and Health Equity for Māori in Aotearoa New Zealand: A Prospective Burden of Disease Study. *International Journal of Environmental Research and Public Health*. 2022; 19(4):2032. <https://doi.org/10.3390/ijerph19042032>

vehicle tail pipe emissions.² The present draft of the GPS pays little attention to climate change, and this should be corrected. Nearly 40% of New Zealand's CO₂ emissions come from transport; and in line with the recommendations of the Climate Change Commission, the transport sector must lead on the way to net-zero carbon by 2050. Therefore, we recommend:

- Retaining a focus on 'inclusive access' or 'meeting basic needs' for access to food, income and health care
- Retaining a focus on health, not just safety
- Retaining a focus on climate change and reducing emissions
- In line with the Climate Change Commission, retaining a focus on reducing emissions through *both* increasing support and funding for active and public transport, and increasing access to low-emissions vehicles.

Question 2. Do you agree with the overarching priority of economic growth and productivity outlined in the draft GPS 2024?

No, it is essential that equal priority is given to a transport system that supports health, protects the climate, and critically, that enables New Zealanders to **move in order to meet basic needs** such as access to income, food, healthcare, and social connection. Economic growth and productivity, as applied in the GPS, is a limited metric that inadequately considers the impacts (both positive and negative) of the transport system on its communities and the nation. Taking this limited stance shifts the country backwards and means we are not keeping pace with global perspectives and current evidence-based practice.

We recommend that the extensive range of benefits associated with walking and cycling provision, as recognised by New Zealand Transport Agency (NZTA), are considered and clearly articulated in decisions about funding these activities, not just economic benefits. These benefits include increased physical activity, increased productivity, decreased health care costs, improved mental health, and decreased congestion. Instead of a focus on 'economic growth' we recommend the use of economic benefits as recognised within NZTA's cost and benefits manuals.

Question 2c. Do you have any comments on the intention to improve public transport through completing Rapid Transit Corridors set out in the draft GPS 2024?

We support the development of Rapid Transit Corridors where appropriate. Local active transport improvements are critical to support these corridors. Walking and cycling are necessary to access public transport. If it is not safe to do so, people are less likely to use public transport.

Question 3. Do you agree with the stronger focus on road maintenance outlined in the draft GPS 2024?

We support the focus on road maintenance in principle, if it includes maintenance of active mode infrastructure (including footpaths and cycle lanes).

² Kuschel et al (2022). Health and air pollution in New Zealand 2016 (HAPINZ 3.0): Volume 1 – Finding and implications. Report prepared by G Kuschel, J Metcalfe, S Sridhar, P Davy, K Hastings, K Mason, T Denne, J Berentson-Shaw, S Bell, S Hales, J Atkinson and A Woodward for Ministry for the Environment, Ministry of Health, Te Manatū Waka Ministry of Transport and Waka Kotahi NZ Transport Agency, March 2022.

Question 3b. Do you have any comments on the Government’s priority to create a Pothole Prevention Fund across two activity classes to ringfence maintenance funding to help address the record number of potholes on our roads?

We support this, with the proviso that funding is not reallocated from active and public transport to pay for potholes. We also strongly recommend that this fund is available to all activity classes, i.e. to maintain footpaths and cycleways as well as roads. The maintenance of infrastructure is critical to safety and facilitating its use. We also recommend that the major cause of potholes, i.e. the high levels of heavy transport on our roads, is addressed within the GPS, and recommendations are made to reduce the use of roads for heavy transport – by moving more of our freight to rail and coastal shipping. We note that the average weight of passenger vehicles is rising, with growing numbers of light trucks in the passenger fleet. This is well illustrated by the photo on the front page of the GPS, capturing a motorway on which double cab utes predominate. A comprehensive approach to preventing potholes would include measures to reduce motor vehicle traffic and to promote light vehicles over heavy ones. It would be sensible also to acknowledge the influence on road surfaces of heavy rainfall, and to question why pothole-inducing weather is becoming more common.

Question 4. Do you agree with the priorities in the draft GPS 2024 to improve safety on our roads through greater police enforcement targeting drink driving, drug driving, and excessive speeding?

We support actions to improve safety and reduce deaths and serious injuries (DSI) on our streets, however, we do not support the approach outlined. We believe that an evidence-based approach must be taken to improving safety; and thereby support a ‘safe systems’ focus, and do not agree with the focus on individual behaviour and ‘poor choices’ within the draft document. Approaches that focus on individual responsibility are **not effective** at achieving population behaviour change. Environmental approaches, especially creating safer transport environments through slower speeds and appropriate infrastructure for active transport are essential for achieving reductions in DSI.

There is significant unmet need for walking and cycling in Auckland and unsafe transport infrastructure is consistently reported as the major barrier to people getting about actively. Three-quarters of urban-dwelling adults report that they would cycle if the roads were safer, noting in particular the need for separation from other modes.³

Numerous studies with thousands of Auckland children show that unsafe transport environments are the key barrier to children’s active transport. Children, parents, and school representatives consistently report the need for slower speed limits, separated cycling infrastructure, wider

³ Waka Kotahi New Zealand Transport Agency. (2023). *Understanding attitudes and perceptions of cycling & walking*. Author: Wellington, New Zealand.

footpaths, and safer crossing infrastructure to enable children to get about safely.^{4,5,6} Despite children's desires to walk or bike to school,⁷ active transport to school is low and declining in New Zealand. Approximately 33% of children and young people get to school actively,⁸ and only 12% of adolescents get to school actively.⁹ New Zealand has one of the lowest rates of active transport internationally.¹⁰

Outcomes the Government expects will be achieved:

Question 6. Do you agree with the outcomes expected to be achieved through the draft GPS 2024?

We reiterate that the land transport system has wide-reaching positive and negative outcomes on health and wellbeing of communities (with downstream impacts on productivity and economic outcomes). Failure to account for these outcomes will result in a narrow frame to understand whether approaches are appropriate, fit for purpose, or meet the needs of New Zealanders, leading to a narrow, and biased understanding of what the nation needs and the role of the transport system in achieving a thriving society.

Question 6a. Do you have any further comments regarding the outcomes expected to be achieved under the priority of economic growth and productivity? These include reduced journey times, less congestion, improved access to markets, more efficient supply chains, and unlocking access for housing development?

It is highly likely the population of Auckland will have less access to the benefits of transport under the current proposals. We expect more financial stress for those paying for public transport or having no access to cars. This will lead to lowered access to healthcare and to other health promoting services such as nutritious diets, healthy housing, and preferred employment.

⁴ Smith, M., et al. (2019). Children's transport built environments: A mixed methods study of associations between perceived and objective measures and relationships with parent licence for independent mobility in Auckland, New Zealand. *International Journal of Environmental Research and Public Health*, 2019. 16(8): p. 1361.

⁵ Ikeda, E., et al. (2021). Keeping kids safe for active travel to school: A mixed method examination of school policies and practices and children's school travel behaviour. *Travel Behaviour & Society*, 21, 57-68. <https://doi.org/https://doi.org/10.1016/j.tbs.2020.05.008>

⁶ Smith, M., et al. (2020). An integrated conceptual model of environmental needs for New Zealand children's active travel to school. *Journal of Transport & Health*, 16, 100814. <https://doi.org/https://doi.org/10.1016/j.jth.2019.100814>

⁷ Hinckson, E. (2016). Perceived challenges and facilitators of active travel following implementation of the School Travel-Plan programme in New Zealand children and adolescents. *Journal of Transport & Health* 3(3): p. 321-325.

⁸ Smith, M., et al. (2019). Trends and measurement issues for active transportation in New Zealand's Physical Activity Report Cards for children and youth. *Journal of Transport & Health* 15: p. 100789.

⁹ Wilson, O.W.A., et al. (2023). Results from Aotearoa New Zealand's 2022 Report Card on Physical Activity for Children and Youth: A call to address inequities in health-promoting activities. *Journal of Exercise Science & Fitness*. 21(1): p. 58-66.

¹⁰ Aubert, S., et al. (2022). Global Matrix 4.0 Physical Activity Report Card Grades for Children and Adolescents: Results and Analyses From 57 Countries. *Journal of Physical Activity & Health*, 1-29. <https://doi.org/10.1123/jpah.2022-0456>

Question 6c. Do you have any further comments regarding the outcomes expected to be achieved under the priority of Safety? These include reduction in deaths and serious injuries, and increased enforcement?

Drawing on substantive evidence on transport strategies and safety we expect there will be an **increase** in DSI because of this proposal. The forecasted increase in vehicle kilometres travelled and removal of speed limit reductions are likely to increase risks of vehicle DSI. Cycling and walking related DSI are likely to increase due to increased numbers of cars and failure to provide safe infrastructure for cycling and walking.

We expect there to be an increase in ill health and years of life lost (and associated health-care costs) through either a reduction in walking, cycling and public transport use or, at best, failing to increase walking and cycling, due to a lack of safe infrastructure. Of note, aside from the tremendous human suffering, every DSI creates huge cost to the NZ health system and is a massive drag on growth and productivity.¹¹

Investment in land transport:

Question 9. Do you agree with the proposed Activity Class descriptions and funding ranges?

We are very concerned about the significant reduction in funding for active and public transport. These forms of transport are an essential component of emissions reduction plans in Auckland. We recommend that funding should be increased, not decreased. One of the stated outcomes the Government expects will be achieved by this GPS is “less congestion and increased patronage on public transport”. At the same time the GPS is seeking increased public transport fare-box recovery. In the current cost of living crisis and falling patronage (likely due to COVID impact and the renewal work on the Auckland Rail Network) this seems counter-intuitive. Affordable and accessible public transport is critical to get people out of their cars.

E-bikes have driven a step change in the way people choose to travel around Auckland. Many people, particularly older adults, are now using E-bikes to move around, connect and engage. Ongoing investment in the cycling network is critical to respond to this change. The Walking and Cycling activity class lacks clarity whether investment in new or expanding existing cycle infrastructure will occur.

We are also particularly concerned about the restriction of funding for ‘walking’ improvements to the walking and cycling activity class. This will have a significant negative effect on basic walking level of service that affects all New Zealanders (noting 60% of New Zealander’s exercise comes from walking – much of this on local roads), but will have an especially profound negative effect on:

1) Disabled New Zealanders who need this infrastructure to access their basic needs and participate in their communities. New Zealand has an obligation to eliminate barriers that people with disabilities face in the transport system under Article 9(1) of the UN convention on the Rights of Persons with Disabilities.

¹¹ Te Manatū Waka Ministry of Transport. (2023). Social cost of road crashes and injuries: Methodology and user guide. Wellington: Te Manatū Waka Ministry of Transport.

2) Low-income New Zealanders, who are much more likely to rely on walking to meet their basic needs.

3) Children, for whom walking and biking is a primary form of transport, physical activity, and play. Adequate walking and cycling infrastructure is essential to enabling children to engage in play and recreational activities – a fundamental right under the United Convention of the Rights of the Child (ratified by New Zealand in 1993).

4) Older adults and those without a licence, who rely on safe and connected walking and cycling infrastructure to get about actively, or for the first and last legs of public transport journeys.

We note that there are issues of law that arise under the GPS if implemented as proposed. Firstly, there are requirements for Councils to design roading infrastructure in ways that enable disabled people to use streets and roads under the Local Government Act 1974, and the restriction of funding for walking improvements from activity classes will undermine the ability of Councils to meet these legal obligations. In particular, section 331(2) provides that

“forming or reforming any road or part thereof (not being a road in a rural area), the council shall ensure that reasonable and adequate provision is made for the kerb and channel of any footpath or part thereof to be formed or reformed so as to permit safe and easy passage from kerb to kerb of any mechanical conveyance normally and lawfully used by a disabled person.”

Secondly, the draft may contravene limitations placed on the contents of a GPS on land transport. Section 70(2) of the Land Transport Management Act 2003 limits the ability of the GPS to dictate obligations of funding within activity classes, which the draft GPS may do through the restriction of funding ‘multi-modal’ projects under the majority of activity classes. Furthermore, this direction of how funding is applied in activity classes encroaches on the statutorily independent functions of the New Zealand Transport Agency found in section 95(2) of the same Act.

We therefore ask that changes are made to ensure that this critical level of service for walking and use of mobility aids can be funded in all activity classes and is not restricted to the walking and cycling activity class.