

Government Policy Statement on Land Transport (GPS) 2018-2027

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu o Te Waka a Maui. NMH welcomes the opportunity to comment from a public health perspective on the Government Policy Statement on Land Transport (GPS) 2018-2027.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH, particularly in relation to promoting active transport modes and reducing environmental impact.

General Comments

4. Transport and health are interlinked. Transport can impact our health through exposure to air and noise pollution; ability to access to services, walking and cycling routes; impact on social isolation and the level of community severance; and risk of road injury or deaths.¹
5. NMH commends the Ministry of Transport for taking a bold approach to transport funding by taking a holistic view that looks at all forms of transport being integrated with the urban form of New Zealand. NMH is very supportive of the new direction that the GPS has taken in terms of:
 - improving safety,
 - increasing modal neutrality by investing more in active transport modes such as walking, cycling and public transport,
 - improving the effects of the transport system on the natural environment.

Investment in these areas can make a positive contribution to health, social and environmental outcomes.

6. NMH was pleased to see that the NZ Health Strategy has been identified as a government policy relevant to transport. The focus of this Health strategy is that all New Zealanders live well, stay well and get well. It is important the transport

¹ <http://www.ehinz.ac.nz/indicators/transport/about-transport-and-health/>

system enables people to have transport options that promote wellbeing and easy access to services regardless of age or ability.

7. NMH supports the two key strategic priorities (Safety and Access) and the two supporting strategic priorities (Environment and Value for Money). This approach will lead for better health outcomes from the transport network by providing users with more choices, and less adverse effects on the surrounding environment.

Strategic Direction: Safety

8. It is pleasing to see that a key priority is to significantly reduce the number of deaths and serious injury, and that a range of objectives addressing the state of the roads, speeds, vehicles and user behaviours have been identified. By adopting the "Vision Zero" framework with its safe system principles, it is hoped that numbers of serious accidents are reduced significantly.
9. NMH supports further investment in safety improvements on state highways and local roads.
10. NMH notes that the GPS supports investment into accelerating the implementation of the new Speed Management Guide (point 35). In addition to this, there needs to be mechanisms in place that allow communities to work with local authorities and NZTA to temporarily make changes road speeds when areas are identified as problematic. The current rules only allow for temporary speed reductions to occur for maintenance or natural hazards but not for safety reasons. Recently, in Tasman, there have been a number of accidents on SH60 between Richmond to Mapua which resulted in over 80 submissions to the Tasman District Council's Regional Land Transport Strategy requesting safety improvements. All of these submissions asked for a temporary speed reduction whilst other safety improvements could be made to the road. Currently, Councils are unable to reduce speed limits on State Highways temporarily due to the processes required by NZTA. These internal processes take significant time. In order to reduce the number of potential accidents in the interim, it would be more appropriate to give Councils the ability to temporarily reduce speed in identified dangerous places in the interim whilst a full review and consultation period takes place.

Recommendation: that Councils are given the ability to temporarily reduce speed limits where safety is identified as a concern whilst NZTA conducts its Speed Reduction review.

11. NMH supports investment into the following matters:

- Safe system treatments to the highest-risk parts of the network *in each region*

- Safety interventions such as improved skid resistance, signs and markings
- Ongoing maintenance of safe system treatments
- Increased rail safety

12. NMH supports investment that will improve safety for all users through ensuring safe and appropriate travel speeds, improving roads, roadsides and intersections. NMH is pleased to see that emphasis has been placed on reducing harm to vulnerable road users such as pedestrians, cyclists and those who are mobility impaired.

13. NMH is pleased to see that the GPS has specifically identified the need for policy development for ensuring there is

- safer and appropriate speeds, in particular around schools.
- improving the safety of active transport modes, including rules for the types of vehicles should be allowed on footpaths, cycleways, shared paths and roadways and under what conditions.

14. NMH is also pleased to see that there will be a focus on public engagement and partnership around road risks and safety measures.

15. NMH supports research *"into the broader harms of transport such as public health concerns from air and noise pollution"* (point 33). Additional research into the impact of transport on health would be beneficial.

Strategic Direction: Access

16. NMH is supportive of the GPS's intention to promote mode neutrality and promote transport choice especially in regards to walking, cycling and public transport. There are numerous benefits in promoting active transport. Increased numbers of walkers and cyclists can stimulate economic activity, promote accessibility and community cohesion, reduce congestion, improve safety, reduce transport emissions and improve public health². For children, using active transport to and from school is an important way to get some physical activity each day. With the high child obesity rate in New Zealand, this is a relatively easy way to increase physical activity in children.

² Ministry of Transport (2008) Raising the Profile of Walking and Cycling in New Zealand. Retrieved from <http://www.transport.govt.nz/assets/Import/Documents/RaisingtheProfileWalkingCyclinginNZ.pdf> on 3 January 2018.

17. NMH supports investments that make streets more inviting places for people. Creating places that are attractive and safe for people to use means that more people will walk and cycle in the area decreasing car dependency. This is good for mental and physical health.
18. It is encouraging to see that the GPS has put a focus on public transport investment. This type of investment gives people transport choice as well as providing more vulnerable groups such as older people, unemployed and those with limited mobility with a means of travel.
19. NMH supports investment in increases in public transport capacity (availability and frequency).
20. NMH would like to emphasise the importance of further investment in public transport outside of the main centres. Many smaller cities have limited bus services which don't service the cities' satellite towns. In recent years, many community groups have lobbied local councils for such services without success. This happened in Tasman late 2017³ where the Motueka and Wakefield communities lobbied for services to Nelson. Initial start-up costs and the uncertainty of the viability of routes can be costly for councils, so many councils have been reluctant to support such services. Access to public transport gives more people the ability to travel to work and access social and leisure activities, the lack of bus services restricts people's movement especially the more vulnerable. Therefore there has been public disappointment when trials, such as the Tasman trial, were shown to be a potential financial risk to the council. Given that public transport is seen as a priority in the GPS then consideration should be given at a regional level for a fund that allows Councils to trial or extend public transport services. If a community has identified a need for specific bus services, then the Council could apply for central government funding to trial a service that covers (fully or partial) start-up costs and allows for an altered farebox recovery ratio such as 75:25 for one year in order to encourage people to utilise the service. Following the initial trial, depending on its success rate, the Council could then transition to using the Low Risk/Low Cost funding to trial the service for a further four years altering the farebox recovery as appropriate. This would mean that communities have the ability to tailor public transport services which suit their needs, and Councils do not carry as much financial risk.

³ <https://www.stuff.co.nz/business/98254529/tdc-axes-wakefieldnelson-motuekanelson-express-bus-proposals>

21. *Recommendation*: that a separate regional fund is established for Councils to trial new public transport routes.
22. NMH is pleased to see that the Ministry will investigate any regulatory barriers to the uptake and delivery of public transport, walking and cycling in New Zealand.
23. NMH notes that the GPS states that "central and local government investment in urban areas should incentivise mode shift" (point 91). Consideration should be given to the provision of a dedicated fund for large institutions such as polytechnics and district health boards who have significant numbers of staff and visitors to employ travel planners and implement travel planning in association with local councils and public transport providers. Reducing single occupancy car dependence in these groups would add to the resiliency of current roading and parking infrastructure while simultaneously providing health, environmental and economic benefits.
24. *Recommendation*: that a fund is established for large public institutions to implement travel planning in order to reduce the impact of single occupancy car dependence.
25. NMH supports the following measures that will enable mode change:
- Integrated land use planning that reduces the need to travel by private vehicle travel
 - More frequent and highly patronised public transport services
 - Extending greater priority on urban routes for walking, cycling and public transport
 - Better management of parking to reduce subsidies for single occupant vehicle travel
 - The provision and ongoing maintenance of good, quality, safe, fit-for purpose walking and cycling infrastructure
 - Education, promotion, and where necessary regulation to improve the real and perceived safety of cyclists and pedestrians
 - Extending dedicated cycle networks in urban areas that moving towards being complete and contiguous
 - Projects focused on increasing the uptake of children using safe and active travel, especially to and from school.

Strategic Direction: Environment

26. NMH commends the Ministry for including the environmental objective “a land transport system that reduces the adverse effects on the climate, local environment and public health” (page 18). It is pleasing to see that the Ministry has taken a broad approach to assessing environmental impacts so that it includes to likes of run off from roads into waterways and behaviour change strategies.

27. NMH supports the Ministry’s intention to encourage

- a whole-of-systems approach to reducing greenhouse gas emissions,
- investment in lower emission transport modes as this will reduce respiratory health problems
- continual reporting on environmental harm mitigation
- reduced effects of transport-related air pollution, stormwater run-off and road traffic
- regional and local systems approaches that are evidence based to increasingly mitigate the local effects of land transport on the environment. Encouraging more brownfield and infill developments can utilise existing transport networks and reduce the need for extended infrastructure
- increased uptake of active transport

28. NMH notes that the GPS has included a range of opportunities to reduce greenhouse gases including increasing uptake of low-emission and electric vehicles as well as shifting to lower emission modes of transport such as public transport (point 121). NMH encourages the MOT to consider further investment into electric rather than diesel buses as this will further reduce pollution.

Strategic Direction: Value for Money

29. NMH notes that the GPS states 21 that “traditional approaches to transport economic evaluation have tended to overstate the benefits of new road capacity and understate the benefits of walking, cycling and public transport investment” (point 138). NMH supports the investigation into the current evaluation practices and urges the Ministry to include tools that robustly capture and evaluate the economic benefits and costs alongside social, health and environmental benefits and costs for investments as soon as possible.

30. NMH supports improvements to the One Network Road Classification in terms of its provision for walking, cycling and public transport in urban areas.

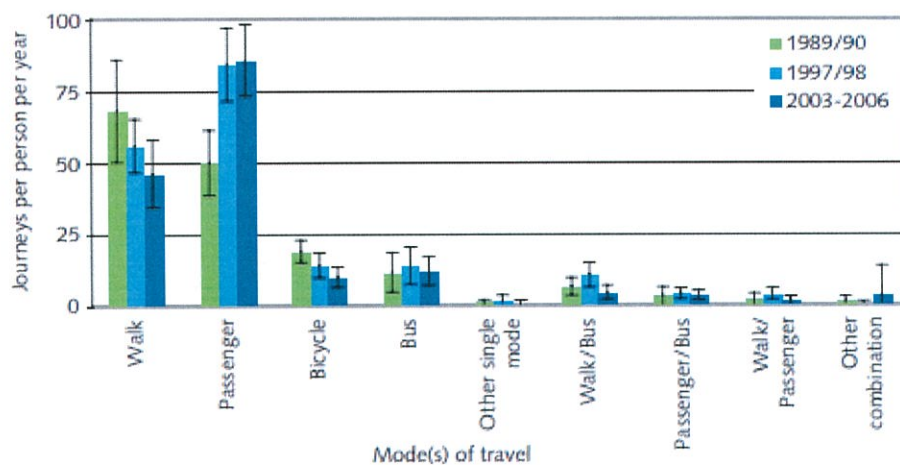
Section 2.6 Transitional rail funding

31. NMH support investment into the national rail network as this type of funding will provide more transport options. However, some areas in New Zealand, including Nelson, do not have a rail network. Therefore NMH asks for consideration to be given to increasing investment of public or active transport in areas without rail networks.

Section 2.7 Themes

32. NMH commends the Ministry for having modal neutrality as one of the guiding principles to be applied to GPS investment. Previous decades of under investment in walking, cycling and public transport modes has led to low numbers of people participating in these modes, this is particularly true for school children. Walking rates have declined, from being the most commonly-used mode of transport to school in 1989 to be only just over half as common as being driven in 2006⁴. Investment in active modes will be beneficial to all age groups.

Figure 3: Travel to school – ages 5-12



33. NMH agrees that integrated land use and transport planning are essential. Unless well planned for, urban sprawl can contribute to motor car dependency, especially if there is a lack of active and public transport networks. This has negative social

⁴ <https://www.transport.govt.nz/assets/Import/Documents/RaisingtheProfileWalkingCyclinginNZ.pdf>

and environmental impacts. NMH supports GPS funding that enables local and central government facilitate integrated and coordinated land use planning.

Summary of Recommendations

- 34. *Recommendation:* that Councils are given the ability to temporarily reduce speed limits where safety is identified as a concern whilst NZTA conducts its Speed Reduction review.
- 35. *Recommendation:* that a separate regional fund is established for Councils to trial new public transport routes.
- 36. *Recommendation:* that a fund is established for large public institutions to implement travel planning in order to reduce the impact of single occupancy car dependence.
- 37. *Recommendation:* that investment of public or active transport is increased in regions that will not benefit from rail funding.

Conclusion

38.NMH thanks the Ministry for Transport for the opportunity to comment on the Government Policy Statement on Land Transport (GPS) 2018-2027. NMH is pleased to see that this GPS plans have significant investment in active and public transport and also plans to lessen the environmental impact of the transport system as this will have positive health outcomes for the community.

Yours sincerely



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