

Submission re He Tūāpapa ki te Ora / Infrastructure for a Better Future / IF-179162299

Overall we commend the Commission's work, in particular we support the direction and emphasis that has been adopted for transport in New Zealand

However, there are so key issues to be addressed:

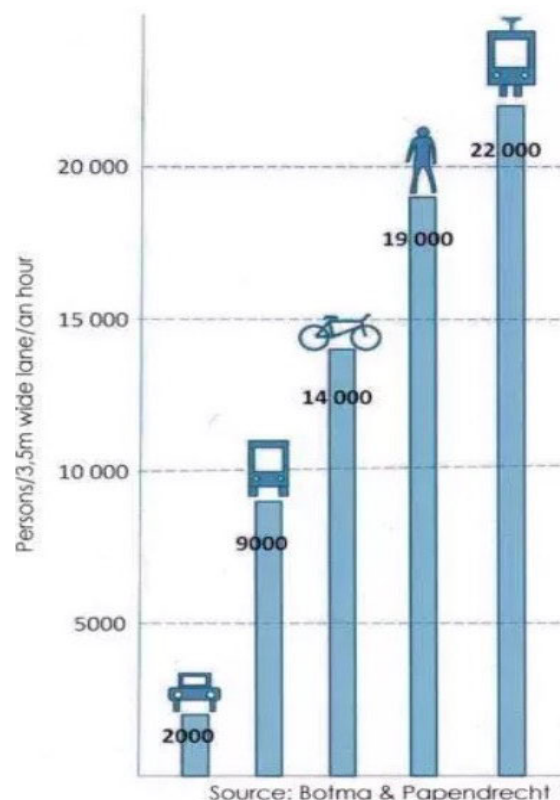
1. NZTA does not do transport planning. NZTA's culture is project engineering, focussed on building bigger roads for ever greater numbers of vehicles. NZTA do not do transport planning, they simply look at a small geographical areas and apply their business as usual project evaluation.

Furthermore, the Government of the day regularly steps in with Crown funded projects outside NZTA's assessment criteria and the GPS on Land Transport.

2. NZTA are trapped by their **funding model** which is primarily from the **burning of fossil fuels**. NZTA is financially rewarded by more vehicles being driven more often and greater distances.

Consequently, NZTA operate in a cycle of **"predict and provide"**. New roads are built at great cost, these roads are then "free" to use at peak times - this induces more traffic and creates worse congestion across the network. NZTA then plan to build new roads to address the problems created by the new roads.

NZTA is beholden to the most inefficient and unsustainable mode for moving people, as highlighted in **this graph**:



3. NZTA is conflicted not only by its funding model, but also by its dual role of deciding which projects to fund and then being responsible for implementing them. NZTA's culture sees it preferring big engineering projects at large cost. Despite attractive brochures like "Keeping Cities Moving", NZTA is not interested in behaviour change, urban design, land-use planning or mode shift (eg: the Avoid-Shift-Improve model provided in MoT's Pathways to Zero).
4. NZTA can ignore the GPS because there no consequences for doing so. NZTA's investment appraisal methodology is contrary to and dismissive of the GPS (**see Page 6 for details**). This is particularly noticeable in the way that NZTA continues to use predicted travel time savings for motorists to justify new roading projects when the GPS 2018 or 2021 do not include travel time savings for motorists.

Since 2018, NZTA has been required by the GPS on Land Transport to reduce carbon emissions. But in 2021 they continue to increase, are forecast to do for the foreseeable future, and remain NZ's fastest growing source of greenhouse gas emissions.

In summary, **the current system is broken and no strategy will fix it**. As management consultant Peter Drucker said "*culture eats policy for breakfast*".

As outlined in this submission, we need a **restructure in the transport sector**.

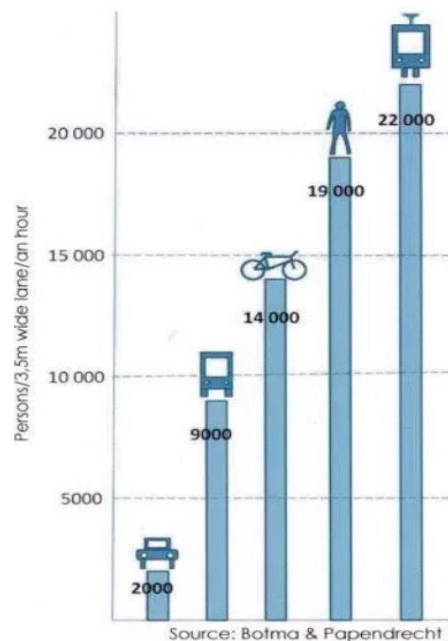
In response to specific questions asked by the Commission...

Our response to **Question 5: We urgently need Congestion pricing**.

1. Congestion pricing schemes around the world have been effective at addressing traffic congestion and are relatively easy to fine tune to obtain the results desired (unlike new roading which typically only provide short-term relief from traffic congestion due to induced traffic, thus resulting in increased congestion, travel time delays and emissions across the network).
2. Congestion pricing aligns with and delivers on all four of the GPS 2021's strategic priorities: **Safety, Better travel options, Improving Freight Connections and Reducing greenhouse gas emissions**.
3. Congestion pricing aligns well with the draft advice from the Climate Change Commission (31 Jan 2021 draft advice, page 14):

“In Aotearoa we need to change the way we build and plan our towns and cities and the way people and products move around. This includes making walking and cycling easier with good cycleways and footpaths. It means moving freight off the road and onto rail and shipping. It means reliable and affordable public and shared transport systems. And it means an electric or low emissions transport fleet.”

4. A successful congestion pricing scheme generates mode shift where more people are carried by the more efficient, cost-effective and sustainable transport modes:

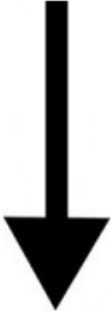


Congestion pricing can be expected deliver billions in saving by doing away with unnecessary roading projects, eg: Mill Road (\$1.4B), East-West (\$1.8B) and additional Waitemata Harbour Crossing motorway (circa \$8B), Pennlink, etc.

These savings can be applied to improved public transport services (included reduced/free patronage) and walking/cycling facilities.

5. Congestion pricing delivers on the first priority intervention required to improve cycling being “Reduce traffic volumes” per this hierarchy provided by NZTA’s Planning a cycling network:

Table 2: Hierarchy of provision for cycling

Consider first  Consider last	<ol style="list-style-type: none"> 1. Reduce traffic volumes 2. Reduce traffic speeds 3. Treat hazardous sites/pinch points/intersections 4. Reallocate carriageway space to provide space for cycling (not necessarily marked, eg wide lanes or shoulders) 5. Specific cycle facilities (eg painted cycle lanes, separated cycleways, depending on the traffic speed and volume and target audience) 6. Exclusive off-road facilities for cycling 7. Shared paths
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<https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/cycle-network-and-route-planning-guide/principles/hierarchy-of-provision-for-cycling/>

6. Congestion pricing delivers on the first priority intervention required to improve walking of “Reducing traffic volumes” - per this hierarchy provided by NZTA’s Principles of pedestrian network planning:

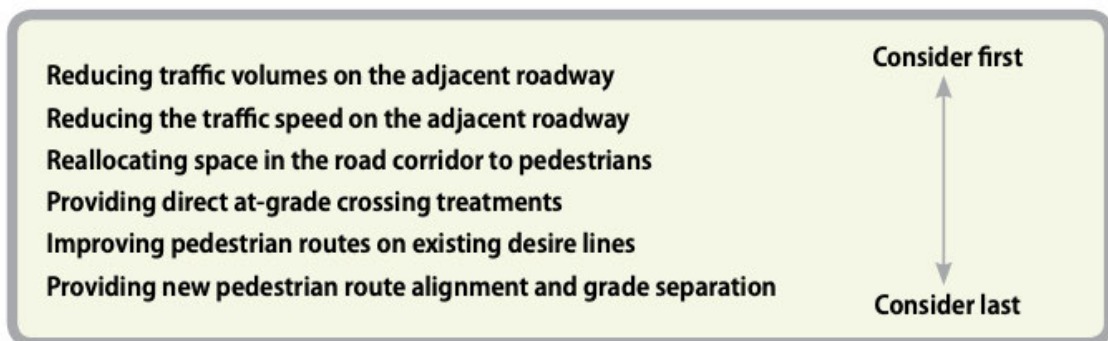


Figure 5.2 – Hierarchy for considering solutions

<https://www.nzta.govt.nz/assets/resources/pedestrian-planning-guide/docs/chapter-5.pdf>

7. Congestion pricing aligns with the May 2021 MoT Green Paper “Transport Emissions: Pathway to Net Zero by 2050” which adopts the “Avoid, Shift, Improve” framework. Hence it makes sense to be working toward a national-wide “Smart road pricing” as outlined on page 59 of the Green Paper. This is where vehicle use is charged for based on what (eg:

vehicle weight and carbon emissions), where driven and when (eg: peak time, shoulder or off-peak).

8. NZTA must no longer have the dual role of deciding which projects to fund and then being responsible for implementing them. Instead these roles must be separated, with the funding role being given to a new planning organisation that has its roots in:
 - behaviour change
 - urban design
 - land-use planning
 - health
 - transport economics
 - climate change

Civil engineers must be excluded from key decision making roles of which projects to fund. This is because engineers are not planners, hence they must only be referred to for specialist technical expertise.

This new planning organisation should also manage the transport systems pricing scheme proposed in Pathway to Zero. The transport systems pricing scheme will need to be rolled out nationwide, in particular for congestion charging as many cities face this particular issue.

9. Transit-oriented development is a no brainer, but NZTA and Government struggle to resist yet another big motorway project.

Thank you for the opportunity to make a submission. MOVEMENT has been advocating for sustainable transport since 2004. Learn more about MOVEMENT at www.movement.org.nz

Please do not hesitate to contact us with any questions.

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NZTA's new investment assessment approach failing to give effect to GPS 2021:

1) NZTA is not assessing projects against the indicator results provided in Sec 2.6 of GPS 2021 as required by Clause 89 of the GPS 2021.

Instead, NZTA advises on Pg 8 of its Final Assessment Technical Document (copy **attached**) that "***The project team should select the appropriate criteria for their activity on a case-by-case basis.***"

Furthermore per Clause 52 and 53 of GPS, investment decisions should be guided by the GPS 2021 four strategic priorities, with reducing emissions of particular importance: "***This GPS reflects the importance of making investment decisions in the transport sector that will help New Zealand towards that goal.***" However NZTA's advice is for a much lower threshold for consistency with the GPS and allows rising emissions to be ignored, this allows bias to creep into the project assessment resulting in results not consistent with the GPS.

2) Rather than prioritising projects that meet the most (and ideally all) of the four strategic priorities sought by GPS, NZTA's Investment Prioritisation Method advises on Page 11:

"In order to keep the Investment Prioritisation Method reasonably simple to understand and apply, ratings for the GPS Alignment and Scheduling factors are assigned based on the highest expected contribution to a single GPS strategic priority."

Hence NZTA can say a new road has "HIGH" alignment with the GPS because it is "***Improving connections between nationally significant production and distribution points***" (page 15 of IPM) and completely ignore all the detrimental failings for the other priorities, such as carbon emissions, road safety and induced traffic (which reduces accessibility for active transport).

It is interesting to note that "***Improving connections between nationally significant production and distribution points***" is not one of the 31 proposed indicators from Section 2.6 of GPS 2021.

On this basis..

3) NZTA's Monetised benefits and costs manual should exclude Travel Times Savings for motorists in its appraisals as these do not align with the desired results or indicators of GPS 2021.

4) The Investment Prioritisation Method does not align with GPS (see Section 3.2) as NZTA's Investment Prioritisation Method excludes Effectiveness as required by Clause 89 which is key to ensuring NLTF projects are effective in delivering the desired results of the GPS 2021.