Submission to the Ministry of Transport
Re: draft Government Policy Statement on Land Transport

31 MARCH 2017

Introduction

The IPENZ Transportation Group is a Technical Interest Group of the Institution of Professional Engineers New Zealand (IPENZ). The IPENZ Transportation Group’s aim is to “advance technical knowledge, integrated planning, safety, traffic and asset management of existing and proposed transportation facilities, networks and systems for the movement of people and goods by all modes of travel”.

The IPENZ Transportation Group has approximately 1,000 members. Membership is open to IPENZ members and others with a professional interest or direct involvement in the science, practice and technical aspects of the teaching, planning, design, implementation and management of transportation systems and facilities.

IPENZ Transportation Group members include all those involved in planning, design, development management and the many facets of traffic management for all modes of transport. The Group supports specialist interest areas such as traffic management, traffic engineering, highway engineering, land based transportation planning, safety, asset management and energy.

Submission

The IPENZ Transportation Group (“we”) appreciate the opportunity to comment on the draft Government Policy Statement on Land Transport (“the draft GPS”).

General Comments

We note the draft GPS has a strong emphasis on freight and tourism. This is understandable as freight and tourism are the mainstays of New Zealand’s economic success. However, we believe it important that the Ministry not lose focus of the people who fund our roads through taxation. There must be a focus in the GPS and other transport strategies on delivering what the customer needs, rather than what provides the best results in an economic model.

The NZ Transport Agency has carried out some excellent work in their Customer Insights, much of which does not appear to have been carried through to the evaluation of investment options, as they do not generally result in
projects with high benefit-cost ratios. A review and update of the Economic Evaluation Manual and the way investment benefits are evaluated is way overdue.

We note there is no reference to the Auckland Transport Alignment Project in the draft GPS. We believe some reference would be relevant given the scale of investment and the way in which the project has redefined a collaborative cross-agency approach to setting timings and agreeing projects.

**Comments on the Strategic Priorities**

**Economic growth and productivity**

It is well documented that transport investment stimulates economic growth in the areas it serves. It is also established that capacity augmentation induces demand through improving travel times or improving accessibility. This previously suppressed demand will quickly erode any benefit that was gained through investment. We suggest it is not possible to continue to rely on the old premise that we can simply build our way out of the problem.

Network optimisation is a good way of managing or metering the flows, although it appears to result in peak spreading and redistribution of the problem across the wider transport network.

With the current level of service and predicted population growth in metropolitan areas, genuine alternatives to single occupancy private vehicles are essential to prevent extended periods of gridlock. This is likely to necessitate politically unpopular decisions to be made, which prioritise mass transit over individual vehicles.

**Road safety**

The costs associated with high severity crashes have generally declined since the 1970s, in line with investment in improved vehicles, better driver training, improved roads and more effective policing. However, it appears a lower threshold has been reached and only a step change in one of the four pillars of the Safe System\(^1\) will have the profound effect that Safer Journeys envisions.

We believe that simply pouring ever-increasing funds into safety retrofit is unlikely to have a widespread and sustainable impact on driver behaviour or the number of crashes. It may even have a detrimental impact on the efficiency and resilience of our road corridors.

Investment should be made across all four pillars with a high emphasis placed on the prevention of crashes, rather than offering a “band aid” solution of installing barriers everywhere there might be a crash. This will require better funding on road maintenance and policing, rather than the current marginal increases or flat line year on year.

**Value for money**

Value for money is critical to the economy, particularly when investing billions of dollars of public funds. Transparency is always needed in decision making, as is reporting of benefits achieved or failures.

The current method of establishing benefit-cost ratios for transportation investment relies on a system that is heavily biased towards large scale “motorway” projects, with huge benefits being derived from reducing travel time. While this is laudable, it excludes other projects from high prioritisation.

Post-project and ongoing assessment of benefits of infrastructure investments should be transparent and will help determine the potential benefits of future investments.

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\(^1\) The four pillars are safe roads and roadsides; safe speeds; safe vehicles; safe road use
Comments on the Objectives

A land transport system that addresses current and future demand for access to economic and social opportunities

A greater emphasis on the multi-modal approach is welcomed. There is an urgent need to start proactively seeking genuine alternatives to private car use within our congested cities.

There is a real need for the provision of facilities to service those involved in the road-based transport of goods and self-driving tourists. In particular, the provision of appropriately located stopping places and service centres on popular tourist and freight corridors should be a priority to make our transport system safer and more user-friendly.

The increased focus on regional roads is also welcomed. However, we are concerned that under the current funding regime and with declining rural populations some Road Controlling Authorities (RCAs) will not be able to continue improving and maintaining their vast networks. This needs to be considered and addressed before the issue becomes critical.

A land transport system that is resilient

The whole of system and one network approach is an encouraging progression in the acknowledgement of the holistic nature of transport infrastructure and systems.

There is an urgent need for better roadside information for travellers. The proposed system of variable message signs is an asset that should have been established more than a decade ago; the ability to inform road users of upcoming problems, within minutes of an incident, would allow more informed route choices and proactive traffic management.

At present, the One Network Road Classification (ONRC) is inconsistently applied, there are insufficient categories to define the differences between a rural lifeline and an urban arterial, when defining levels of service based on linkages and traffic volumes, it is apparent that one size does not fit all.

We question whether there is a mechanism whereby the Crown will fund a local road improvement over a state highway, if it is demonstrated as best for the network. Current practice suggests this is not the case and local councils are still required to fund up to their current Funding Assistance Rates.

A land transport system that is a Safe System increasingly free of death and serious injury

Refer also to our comments on Strategic Priorities above.

High profile policing of our roads has a positive and beneficial impact on driver behaviour and the crash rate. However, with funding at its current levels, the optimal level of road policing cannot be achieved.

With a minor change in legislation, it would be possible to allow the use of point to point speed detection on motorways and expressways, reducing the burden on road policing budgets and provide a permanent full time opportunity to reduce excessive speeds on long stretches of our highways.

Externalisation of the management and operation of speed cameras would also reduce the costs of this form of passive policing, although we acknowledge the difficulty in managing the legal side of processing offences if this were undertaken by a third party.

Introduction of demerits for speed camera offences would also be a strong deterrent, likely to discourage persistent low level offenders.
A land transport system that delivers the right infrastructure and services to the right level at the best cost

Refer also to our comments above regarding value for money.

Concerns have been raised that we are maintaining our roads down to a price, rather than up to a standard. Anecdotally, it appears the quality of our rural networks has declined and that “sweating the asset” is likely to result in the need for significant intervention in the near future.

The increasing demand to improve public transport efficiency is concerning – cheaper services do not necessarily make better ones. To provide a realistic and viable alternative to the car for commuting in urban areas, public transport needs to be clean, efficient, and competitively priced. Rural services are more of a challenge, as are inter-peak services, although if more of the funding allocated to road improvement were used to provide public transport, then it may not be necessary to widen roads due to modal shift.

**A land transport system that provides appropriate transport choices**

We fully support investment and prioritisation of alternative modes of transport and increasing accessibility for all. However, there is a pressing need to address the interaction of cyclists and pedestrians. We tend to group them as a single active mode, providing shared facilities which may not be wholly appropriate due to width constraints and demand.

The draft GPS indicates that, in popular tourist areas, investment should focus on providing for tourists who are driving private motor vehicles. This will undoubtedly conflict with the needs and desires of some RCAs where self-drive tourism presents a significant challenge. We are aware that in some regions Councils and the NZ Transport Agency are actively working to replace self-drive tourism with increased active mode and public transport use. This is based on the technical challenges as well as strong public backing for better public transport and cycling provision. The draft GPS’ position could threaten the success of what the local RCAs have already achieved.

**A land transport system that increasingly mitigate the effects of land transport on the environment**

We support the improvement of environmental consideration and the reduction of road related pollution.

We would like to see a greater emphasis on reducing carbon emissions. While the draft GPS acknowledges this as a goal, the funding allocation does not appear to align with this.

**Conclusion**

We appreciate the opportunity to make this submission and are able to provide further clarification if required.

For more information, get in touch with:

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