

19 August 2014

Ministry of Transport
PO Box 3175
Wellington 6140
New Zealand

Dear Sir/Madam

SUBMISSION

To: The Ministry of Transport

**On: The Draft Government Policy Statement on Land Transport Funding 2015/16
– 2024/25**

Introduction

1. This submission is from the Dunedin City Council, PO Box 5045, Moray Place, Dunedin 9058.
2. The Dunedin City Council (the DCC) is the territorial authority responsible for representing the aspirations of the residents and community of Dunedin City under the Local Government Act 2002.
3. Thank you for the opportunity to make a submission on the Government Policy Statement.

Background

Dunedin City Council has undertaken extensive community engagement developing its Integrated Transport Strategy (2013). That Strategy reflects the ambitions of the city to significantly improve road safety and provide mode choice.

Submission

4. *Connecting New Zealand* sets the government's policy direction for the transport sector for the next 10 years. We would like to see a much longer term perspective considered (e.g. 30 years), in light of issues including volatile fuel prices, poor public health, ageing population, transport disadvantage and economic recession.

We would like to see the Government develop a long term, overarching strategy to provide direction for the transport sector.

5. The GPS funding options do not address two significant issues: the need to reassess the decreasing funding streams to provide for transport infrastructure; and the incentive to minimise costs by providing for mode alternatives or more efficient transport options. Funding for the National Land Transport Fund (NLTF) is derived from fuel excise and road user charges. This potentially acts as a disincentive for NZTA investment in activities that reduce vehicle usage and congestion and is exacerbated by NZTA's planning and investment principle that the primary beneficiaries of investment from the NLTF should be vehicle based road users, since these are the primary contributors to the fund. We believe the government should explore other funding sources to finance the NLTF. This will enable:
 - a. fairer investment across all modes rather than disproportionate funding for roads, and

- b. resilience for the NLTF should vehicle kilometres travelled (VKT) continue to remain static or decrease, or should there be an increase in electric vehicle use.

We would like to see the government explore other funding models for the NLTF.

6. Dunedin City Council welcomes the introduction of the Regional Improvements activity class to ensure funding is available for investment in provincial areas. We would like confirmation about what this activity class covers, and what it excludes. We believe it should be able to be used for local roads and bridges, public transport, walking and cycling improvements. We would like clarification about whether projects in Dunedin will qualify for funding under this activity class.

We would like clarification about what can be funded under the Regional Improvements activity class, and advocate that Dunedin should qualify for funding under this class, given it is a regional City serving a wide rural hinterland, and includes the third largest Port in New Zealand.

7. The draft GPS has a strong focus on supporting economic productivity through providing additional highway capacity. We believe this approach should be balanced with elements of travel demand management, particularly since the GPS presents travel data which shows that for the last 10 years there has been population growth, but this has not resulted in increased demand for vehicular travel, as vehicle kilometres travelled (VKT) remain static. In this climate we would advocate caution around investment to accommodate increased VKT which recent trends indicate may not eventuate. Travel demand management measures will enable existing road capacity to be used more efficiently, making better use of the infrastructure that already exists. Travel demand management approaches include providing alternative transport choices, and integrating land use and transport planning.

We would like the GPS to place a greater emphasis on travel demand management, particularly by providing alternative transport choices and integrated land use and transport planning.

8. The GPS states that *"New Zealand's existing network is reasonably well developed and provides most of the connections needed at a local, regional and national level"*. We agree that this is the case for most of the roading network, however for other transport networks, such as public transport and cycle networks, this is not the case. We believe more investment is needed in these modes, however just 0.77% of the National Land Transport funding has been allocated to walking and cycling improvements, and 10.46% for public transport. Yesterday's announcement of the additional \$100 million for funding urban cycleways is welcomed, and a positive step towards improving cycle networks.

We would like to see significant investment to implement and expand public transport and cycle networks in urban areas. We would like the GPS to consider alternative funding mechanisms for the walking and cycling activity class that will enable Councils to make some progress towards the expansion of safe cycling facilities. We would also like to see the economic and health benefits of improving these modes recognised in the GPS.

9. The GPS states that there has been *"considerable investment made in the public transport network to build patronage"*, and now a *"period of consolidation is needed where the focus is on securing the patronage gains anticipated from measures such as integrated ticketing, reconfigured bus networks, and metro rail investments"*. While this may be the case for public transport systems in Auckland, Christchurch and Wellington, this is not the case for many other cities where patronage growth is stagnant or falling. In Dunedin, just 2.7% of the population used a bus to travel to work (2013 census), despite Dunedin's student population and compact nature. This represents an ongoing decline in bus patronage (3.1% in 2001 dropping to 2.8% in 2006) despite demonstrable public enthusiasm for public transport improvements and many thousands of households without access to a car.

We would like to see additional funding available for public transport in cities outside of Auckland, Christchurch and Wellington; and where there are high levels of transport disadvantaged residents. We would like the GPS to state the greater role and benefits that public transport provides including supporting social inclusion, building community resilience, reducing parking demand, facilitating medium density development and providing mobility for those who are unable to drive, or afford to own a car.

10. For funding to develop safe cycle networks in urban areas, and for road safety targets, the GPS adds the caveat "*where this can be achieved at reasonable cost, including the impact on general traffic capacity*". This requirement is not replicated for roading projects and no description or measure is given to define what "at reasonable cost" means.

We would like to see the "at reasonable cost" caveat removed from the GPS for cycling and road safety, or applied across all activity classes.

11. We would like to see clarification about whether recreational and regional walking and cycling routes (such as the New Zealand Cycle Trail) can be included under the Walking and Cycling Activity Class. The GPS also seeks to "*increase safe cycling through improvement of the cycle lane network*"; however many cities are now looking at other options for cycling rather than limiting facilities to 'cycle lanes' alone. We would like this broader approach to cycle facility provision to be recognised in the GPS.

We would like confirmation about the types of cycling facilities that may be funded under the walking and cycling improvements activity class. We advocate that cycle facilities should be separated from traffic where possible, rather than limited to provision of 'cycle lanes'. We would like to see both commuter and recreational routes funded under this activity class.

12. Many small bridges in rural Otago and Southland are wearing out due to age and environmental factors. Some of these are located on HPMV routes but are progressively losing their safe load carrying capacity. This results in restrictions being posted, which can reduce the portion of the network available for freight vehicles. Under the current GPS, replacing an ageing bridge is classified as new capital work, rather than a renewal, meaning these projects have to compete nationally against other new capital projects and are unlikely to be funded. Many Councils try to extend the life of the bridge with minor repairs, however this is merely pushing the funding problem out into the future. Over the next decade, we are likely to be facing a significant issue with failing bridges.

We would like the Government to investigate creating a separate activity class to fund the replacement of bridges.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dave Cull', written over a white background.

Mayor Dave Cull
Dunedin City Council

