

Draft Government Policy Statement on land transport 2024-34

Climate Justice Taranaki submission, 2 April 2024

Introduction

1. Climate Justice Taranaki (CJT)¹ is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change, which will increasingly impact present and future generations' inalienable rights to safe water, food, and shelter, crucial to sustaining livelihoods and quality of life. Composed of a broad range of people with varied expertise and life experiences, CJT has engaged respectfully with government on numerous occasions.
2. CJT welcomes the opportunity to provide feedback on the Draft Government Policy Statement (GPS) on land transport 2024-34². Our submission focuses on the four strategic priorities put forth in the draft GPS.

Priority 1: Economy of enough and wellbeing, not economic growth and productivity

3. We cannot agree with the Government's overarching, strategic priority for economic growth and productivity. We recommend an overarching priority for an economy of enough and wellbeing instead.
4. Economic growth must and will stop because we live on a finite planet within biophysical limits. We simply cannot keep 'growing' by extracting, producing, burning fossil fuels, and wasting energy and materials without getting into deeper trouble. Globally we have overshoot six of the nine planetary boundaries³, beyond which we risk the future of humanity and many of the species we share this planet with. Economic growth is the key driver of these overshoots. To paraphrase Albert Einstein, we cannot fix the problem by continuing with the same approach we used when we created it.
5. Climate change is only one of these overshoots or crises that species including us face. *"We don't know how long we can keep transgressing these key boundaries before combined pressures lead to irreversible change and harm,"* Johan Rockström of the Stockholm Resilience Centre, 2023⁴. Of the five planetary boundaries assessed in New Zealand, all have been transgressed: climate change, land-system change, biogeochemical cycles (nitrogen and phosphorus use), biosphere integrity (biodiversity loss) and freshwater⁵.
6. In our view, the way forward is Degrowth⁶ – a planned reduction of energy and material throughput to enable collective wellbeing within ecological limits, i.e. an economy of enough⁷. This requires reducing the overall energy and material demand, starting with the most polluting and frivolous, while investing more in what really constitutes wellbeing and happiness. Gross domestic product (GDP) merely measures the size of a nation's economy and does not reflect societal wellbeing⁸. For example, higher crime rates and vehicle crashes raise GDP because more money must be spent to deal with them, yet they are not what healthy societies want.
7. CJT submits that priorities ought to be focused on public services, in this case, accessible and efficient public transport and infrastructure that supports safe walking, cycling, etc (i.e. active transport). Other priorities that foster wellbeing include healthcare, education, community-scaled renewable energy system, energy efficient healthy homes and integrated farming systems that produce food, fibre, timber,

¹ <https://climatejusticetaranaki.wordpress.com/>

² <https://consult.transport.govt.nz/policy/gps2024/>

³ <https://www.science.org/doi/10.1126/sciadv.adh2458>

⁴ <https://www.stockholmresilience.org/research/research-news/2023-09-13-all-planetary-boundaries-mapped-out-for-the-first-time-six-of-nine-crossed.html>

⁵ <https://environment.govt.nz/publications/a-safe-operating-space-for-new-zealandaotearoa-translating-the-planetary-boundaries-framework/>

⁶ <https://www.degrowth.nz/>

⁷ <https://newsroom.co.nz/2023/06/16/the-transition-to-an-economy-of-enough/>

⁸ <https://hbr.org/2019/10/gdp-is-not-a-measure-of-human-well-being>

and fuel for local communities, rather than for export. Doughnut economics⁹ and CLEVER (A Collaborative Low Energy Vision for the European Region)¹⁰ offer valuable vision, rationale, and pathways forward.

Priority 2: Emissions reduction and healthy transport, not more new roads

8. The Roads of National Significance are being pushed forward despite their significant material, emission and ecological footprints from construction, use and maintenance. These four-laned, grade-separated highways are supposed to “*reduce congestion, improve safety...*” yet research has shown that the bigger the road, the more trucks and cars will be driven on them over time, resulting in congestion¹¹, crashes, deaths, injuries, pollution related illnesses¹² and impacts on mental wellbeing¹³.
9. The new roads are expected to “*unlock access to greenfield land for housing development and support greater intensification to ultimately improve housing supply, choice and affordability.*” But New Zealand’s housing crisis is complex though largely the result of unconstrained market speculations, inadequate investment in public and affordable housing¹⁴, and poor tenant protection law. Indeed, there are more empty houses¹⁵ owned by wealthy people in NZ than those on the social housing list¹⁶. Pushing into greenfield land with brand new roads would likely encourage further suburban sprawl¹⁷. Hastened by the Fast Track Approvals^{18, 19} process, if passed, the environmental and socio-economic costs would be severe and likely worsen inequality here.
10. The narrowing focus of investments in rail “*on the busiest and most productive parts of the existing rail network*” ignores the importances of rail in reducing overall transport emissions and need for inter-regional passenger travels. It is unacceptable for the Government to remove the ability for the rail network to access the National Land Transport Fund (NLTF). It would result in greater cost burden on track users, especially heavy freight which would move off the track, damage the roads, cause congestion, and create additional hazards for other road users. Reduced funding also means inadequate resources to keep the rail network safe²⁰, and possibly the mothballing of most or all the rail network²¹. Rather than cutting funding, we ask that the Government increase investment and spending to maintain, upgrade, modernise and expand NZ’s rail network, not only for “*the busiest and most productive parts*” but for connecting regions as well.
11. Public transport is also under attack by the Government, with “*increased public transport fare-box recovery and third-party revenue*” to be expected from local government. This would disproportionately affect regions and rural areas with smaller populations, low-income earners and people who can’t or prefer not to drive, restricting their access to social and economic needs and opportunities. It would also put additional burden on local government finances which are already strained by aging water and other critical infrastructure, along with the increasingly urgent need for climate adaptation.
12. CJT is strongly opposed to the proposal to limit investment in walking and cycling only “*where there is either clear benefit for increasing economic growth or clear benefit for improving safety and demonstrated*

⁹ <https://doughnuteconomics.org/about-doughnut-economics>

¹⁰ https://clever-energy-scenario.eu/wp-content/uploads/2023/10/CLEVER_final-report.pdf

¹¹ <https://theconversation.com/do-more-roads-really-mean-less-congestion-for-commuters-39508>

¹² <https://www.ehinz.ac.nz/indicators/transport/about-transport-and-health/#ref6>

¹³ <https://www.tandfonline.com/doi/full/10.1080/01441647.2022.2100943>

¹⁴ <https://www.cpag.org.nz/publications/a-peoples-review-of-kainga-ora-in-defense-of-public-housing>

¹⁵ <https://theconversation.com/as-nz-struggles-to-resolve-its-long-running-housing-crisis-investors-should-be-taxed-for-keeping-homes-empty-212356>

¹⁶ <https://www.nzherald.co.nz/nz/politics/minister-demands-action-from-kainga-ora-over-thousands-of-empty-state-homes/YWZ6RMPMGFC2TH7OQDGPYPIK3U/>

¹⁷ https://openaccess.wgtn.ac.nz/articles/thesis/Suburbia_The_Government_Subsidised_Urbanism_Nightmare/22631413

¹⁸ <https://www.forestandbird.org.nz/petitions/fight-for-nature>

¹⁹ <https://eds.org.nz/wp-content/uploads/2024/03/Draft-FT-Submission-1.pdf>

²⁰ <https://www.rnz.co.nz/national/programmes/morningreport/audio/2018932022/nzta-watered-down-warning-to-government-over-rail-safety-risks>

²¹ <https://thefutureisrail.org/gps-rail>

volumes of pedestrian and cyclists already exist.” The proposal to cut funding for walking and cycling network maintenance by restricting its source exclusively to this activity class (i.e. building a local road would not come with funding for the necessary footpaths, crossings, or protective cycleways) is also unwise and imprudent. Together, the two proposals go against the people-centred transport transformation that is much needed for emissions reduction and people’s health and safety.

13. The over-sized budget for road maintenance is necessitated by the building of more and bigger roads, hence encouraging more heavy freight and road users. It is a vicious circle that needs to be broken, by ringfencing funding for rail, public and active transport, rather than for potholes. Investing in alternative solutions like 20 minutes cities²² and localising essential services would reduce commuting and various transport needs while fostering community cohesion and resilience.
14. Indeed, this Government is attempting to slash all the good things, notably funding for public and active transport, to boost its coffer for emissions intensive and environmentally and financially costly highways and roads²³. The long-term emission impacts from these cannot possibly be dealt with by the Emissions Trading Scheme and New Zealand would risk failing its international climate obligations. CJT simply cannot accept such proposals. Instead of having a strategic priority for more roads and increased maintenance, we ask that the Government prioritise emissions reduction and healthy transport.

Priority 3: Transport for all, not value for money

15. The Government’s proposed \$20 billion spending on transport network would come largely from road user, tax and ratepayer money. We expect many road projects would exceed their initial budgets. A case in point, Waka Kotahi has spent \$172 million of the \$280m budget for the Mt. Messenger Bypass on State Highway 3, without completing a kilometre of road²⁴. The Bypass is expected to save motorists 4-6 minutes of drive time when completed – but at what cost financially and ecologically²⁵? The intention to increase public transport fare box recovery and third-party revenue from local governments, and a review to make road safety investment more “efficient”, would disproportionately affect regions with smaller populations and low-income earners, discourage further public and active transport uptake, and risk public safety.
16. Rather than penalising those who are struggling and have few options, the Climate Emergency Response Fund (CERF)²⁶ should have been ringfenced for public, active and low emissions transport. A progressive tax regime²⁷ whereby the rich pay their fair share is sorely needed.
17. Moreover, Regional Land Transport Plans must be consistent with the GPS to receive NLTF funding. This takes away local democracy and ignores local knowledge and community priorities. As an example, recent public consultations in New Plymouth²⁸ and the Taranaki region revealed an overwhelming desire for better public transport and less reliance on cars, the opposite of what is being prioritised in the GPS.

Priority 4: Slow down and invest in safety, not funding cut and policing

18. Vision Zero²⁹ emphasizes on an ethics-based transport safety approach that looks at how the whole system works together to protect all road users. It calls for safe public transport, safe walking and cycling

²² <https://www.waikato.ac.nz/news-opinion/media/2021/nationwide-survey-launched-to-understand-what-the-20-minute-city-idea-will-look-like-in-new-zealand>

²³ <https://www.greatauckland.org.nz/2024/03/05/the-governments-ideological-transport-policy/>

²⁴ <https://www.rnz.co.nz/news/national/507308/60-percent-of-bypass-budget-spent-without-a-kilometre-finished>

²⁵ https://www.npdc.govt.nz/media/wwelte5z/final-decision-and-conditions-mt-messenger-april-2021_1.pdf

²⁶ <https://www.newshub.co.nz/home/politics/2023/10/analysis-new-zealand-s-carbon-emissions-are-on-the-way-down-thanks-in-part-to-policies-now-under-threat.html>

²⁷ https://www.rnz.co.nz/audio/player?audio_id=2018931526

²⁸ <https://www.npdc.govt.nz/planning-our-future/projects/transport-projects/connecting-our-place/>

²⁹ <https://at.govt.nz/projects-roadworks/vision-zero-for-the-greater-good/>

choices, safe transport infrastructure and operation, safe speeds, high quality roads and streets, safe vehicle technologies and more.

19. The GPS, by comparison, is tunnel visioned on policing. For example, it ignores the demonstrated benefits of lowering speed limits in reducing severe injury, fatality³⁰, fuel use and emissions. Despite highlighting safety, the GPS seeks to reverse the previous government's speed limit reductions. Rather than focusing on increased policing, the Government should support speed limit reductions, better driving education and more stringent qualification standards, as well as the other safety aspects that Vision Zero advocates.
20. Critically, the exclusion of funding for footpaths, safe crossings, and cycleways from roading budgets would undermine safety outcomes. Taranaki, especially New Plymouth and Stratford districts, have some of the worst statistics in cyclist deaths and serious injuries³¹ in Aotearoa. We strongly disagree with the proposed exclusion and ask that funding be maintained and/or increased to improve safety and enable greater uptake of active, healthy modes of transport.

Conclusion

21. During this crucial transition period to a zero-carbon, regenerative economy, our focus should be on how to end fossil fuel reliance, reduce overall energy demand equitably and decarbonise effectively. The draft GPS is diametrically opposed to these societal benefits, as it locks in over-sized investments on emissions intensive roads and road transport, and jeopardises much needed efforts for providing affordable, accessible public transport and safe infrastructure for active transport. It discriminates against regions with smaller populations, low-income earners and people who are unable to drive. It ignores the environmental and social impacts of transport infrastructure, notably 'Roads of National Significance', especially if fast-tracked.
22. Overall, we strongly disagree with the GPS and request that it be binned or reworked with the priorities we propose.
23. Our Toitū Taranaki 2030 transition plan³² offers the way forward for a more sustainable and equitable transport system.

³⁰ <https://www.nzta.govt.nz/safety/partners/speed-and-infrastructure/safe-and-appropriate-speed-limits/the-role-of-speed-in-a-safe-system-wip/>

³¹ <https://www.nzta.govt.nz/assets/resources/communities-at-risk-register/docs/communities-at-risk-register-2022.pdf>

³² <https://climatejusticetaranaki.files.wordpress.com/2021/05/toitu-taranaki-2030-just-transition-community-strategy-apr21-web.pdf>