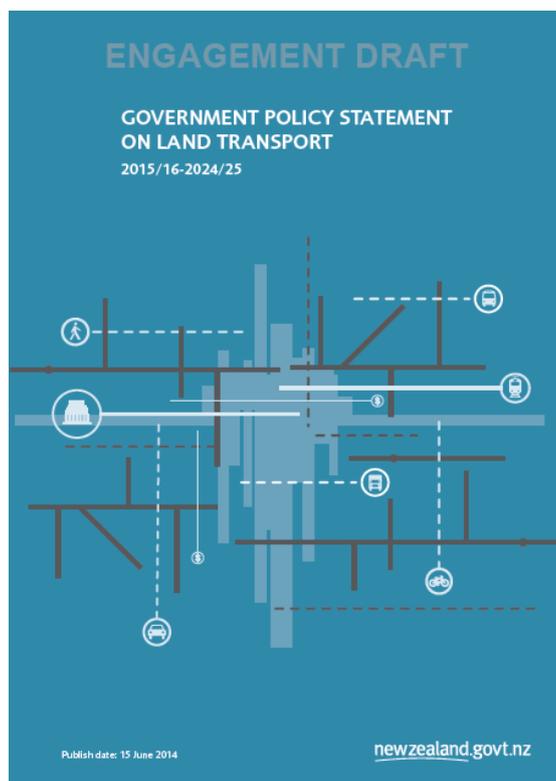


SUMMARY OF SUBMISSIONS

Government Policy Statement on land transport 2015/16-2024/25



EXECUTIVE SUMMARY

The Ministry of Transport wishes to acknowledge and thank all those who submitted on the draft Government Policy Statement on land transport 2015/16-2024/25 (the draft GPS 2015).

This document summarises the submissions received on the draft GPS 2015. It mainly focuses on comments from key stakeholders in submissions, but also briefly summarises feedback received during informal engagement with interested parties.

A total of 3,599 submissions were received about the draft GPS 2015 including:

- 42 from Crown entities and agencies and non-government organisations
- 43 from regional, district and city councils and regional transport committees
- 3,490 from the website “onyerbike.kiwi”
- 24 from individuals.

Although the views expressed in the submissions varied widely, a number of key themes emerged:

- Support for the overall strategic direction proposed in the draft GPS 2015 and for the three priorities of economic growth and productivity, road safety, and value-for-money.
- Varying stakeholder views on how funding should be apportioned to different activity classes, particularly between local roads and State highways, to achieve the GPS priorities.
- Support for the GPS to be more explicit that local authorities are co-investors in the land transport system, including in the submissions of Local Government New Zealand (LGNZ) and the NZ Transport Agency (the Agency).
- Support for the results required of different activity class investments and monitoring of these results, as long as this is not too resource intensive.
- Acknowledgement of, and support for, the increases in available funding for most activities, while seeking further increases - including in local roading, road maintenance, public transport, and walking and cycling.
- Concern that despite their importance, local road funding is being restricted to allow building of more State highways.
- Need for funding allocations to recognise the impact of freight and forecast freight increases on the local road network.
- Concern about lack of links in GPS 2015 to rail freight and coastal shipping.
- Support for more emphasis on resilience.
- Support for the new activity class structure and the merging of activity classes.
- More thinking needed about changing future demand patterns, particularly in light of an aging population, climate change and changing oil use.

INTRODUCTION

1. This document summarises the submissions received during the formal engagement period on the draft Government Policy Statement on land transport 2014/15-2024/25 (the draft GPS 2015).

Engagement process

2. Under the Land Transport Management Act 2003, the Minister of Transport must have regard to the views of LGNZ and representative groups of land transport users and providers in preparing or reviewing the GPS. The Minister of Transport must also consult with the Board of the Agency before issuing a new GPS.
3. The Ministry of Transport (the Ministry) undertook informal stakeholder engagement for GPS 2015 shortly after it established the GPS 2015 project team in June 2013. Over the past year, the Ministry has:
 - held meetings with a number of stakeholders, including LGNZ, New Zealand Automobile Association (AA), and the Road Transport Forum
 - undertaken two series of regional engagement meetings with local authorities
 - commissioned focus group research with representative groups of land transport users.
4. On 15 June 2014 the Ministry, on behalf of the Minister of Transport, began a period of formal engagement, which ran until 11 August 2014. During this time, the Minister of Transport also commenced consultation with the Board of the Agency, seeking its views on the draft GPS 2015.
5. The Ministry publicly released a copy of the engagement document, placing it on the Ministry's website. The Minister of Transport issued a media release to ensure stakeholders were aware of the engagement. The public was invited to provide their views in writing.
6. The submissions received during the formal engagement period are the focus of this summary of submissions.

Submissions received during formal engagement period

7. Stakeholders (excluding individual members of the public) who made submissions are listed in Appendix One.
8. The Ministry received a total of 3599 submissions including:
 - 42 from Crown entities and agencies and non-government organisations
 - 43 from regional, district, and city councils, and regional transport committees
 - 3,490 from the website "onyerbike.kiwi"
 - 24 from individuals.

SUMMARY OF MAIN ISSUES RAISED IN STAKEHOLDER SUBMISSIONS

Strategic Direction proposed for GPS 2015

General comment

9. Most stakeholders, including most local authorities, LGNZ and the AA, generally support the proposed national strategic direction for land transport in the draft GPS 2015, which is to drive improved performance from the land transport system by focussing on three priorities:
 - Economic growth and productivity
 - Road safety
 - Value for money.
10. Some stakeholders, including LGNZ, suggested that resilience be added as a fourth priority, citing the potentially significant impacts on the transport system of the effects from climate change, oil based fuel availability, fuel prices, and natural disasters (such as the Christchurch earthquakes).
11. There was also general stakeholder support for the inclusion of a set of national land transport objectives (see page 22 for comments relating to specific objectives).
12. There were, however, varying stakeholder views as to how funding should be apportioned to different activities to best achieve the GPS objectives and priorities. A number of stakeholders, most notably local authorities, submitted that funding allocations across activity classes need to be adjusted. The current approach is described by some stakeholders as being dominated by investment in State highways, in particular, the Roads of National Significance (the RoNS) at the expense of local roads.
13. Some stakeholders sought further clarification about how the overall strategic direction and objectives translate into how funding is apportioned between activities.
14. Some local authorities submitted there should be better alignment between central and local government's transportation investment priorities, for example by the GPS taking more account of the priorities set out in Regional Land Transport Plans.

Priority: economic growth and productivity

15. Many stakeholders, including the majority of local authorities, support this priority, with many noting that investment in transport infrastructure is critical to economic performance both regionally and nationally.
16. There is a strong view from local authorities that there should be more recognition that economic growth and productivity often commences at the forest or farm gate, most of which are served by local roads, while the draft GPS 2015 maintains the focus of improvements on State highways and particularly the RoNS. In addition, it was noted that heavy freight vehicle movement is not restricted to State highways and local roads have a

particularly strong role in moving export freight (which supports the Government's focus on exports in the Business Growth Agenda).

Priority: road safety

17. There is wide support for the continued emphasis on road safety in the draft GPS 2015, and also for the Government's Safer Journeys strategy. This is reflected in submissions from local authorities and other stakeholders, such as the AA. A number of submitters requested greater support for the Safer Journeys action plans.
18. The proposed increases in the maximum available funding for associated road safety activities are welcomed. However, some stakeholders expressed concern that the status of road safety as one of the three priorities in the draft GPS 2015 is not reflected by the proposed funding allocations, and considered more investment is needed.
19. A number of comments were focussed on supporting initiatives to improve driver behaviour change and the safety performance of vehicles, and to ensure that adequate funding is provided for these.
20. A number of submissions supported preventative safety investment on roads such as cycle underpasses.
21. Some submitters voiced strong concerns about the qualifier "at reasonable cost" for safety projects and recommended its removal.
22. There was general support for greater transparency of safety spend from the stakeholders who commented on this change.

Value for money

23. Overall, there is support for this priority from local authorities and other stakeholders, including the AA.
24. A number of submitters were concerned that the draft GPS 2015 applies the "value for money" caveat only to certain activities. For example, some noted that the results associated with road safety, environmental mitigation and public transport include reference "at reasonable cost" whereas this requirement is not mentioned in the results for other expenditure areas (this is reflected in the submissions of Tauranga City Council, Taranaki Regional Council, the NZ Local Authority Traffic Institute (Trafinz)).
25. Some stakeholders also expressed support expressed for benchmarking and reporting of maintenance expenditure because of the potential to improve consistency of asset management and service delivery (for example, the submission of Rangitiki District Council).

Activity class reconfiguration

26. Stakeholders who commented on changes to the overall activity class configuration generally supported the reduction in the number of activity classes, and the increased flexibility this will create for the Agency to allocate funds (this is reflected in the submissions of Nelson City Council and Southland District Council).
27. Some stakeholders, however, expressed concerns about the merging of some activity classes, as outlined in the following paragraphs.

Treatment of renewals

28. Several stakeholders questioned the inclusion of renewals in the maintenance activity class.
29. Some local authorities thought it important, from an accounting perspective, to continue the separation between maintenance, operations and renewals, as they are typically funded differently by local government. These stakeholders (for example, Nelson City Council and New Plymouth District Council) thought that merging them would reduce transparency and potentially make planning more difficult.
30. Other stakeholders thought that including renewals in the maintenance activity class is not consistent with generally accepted accounting practice because renewals are capital and are not expensed. One submission (Roading NZ/NZ Contractors' Federation) suggested that the reasons for doing this be explained to avoid confusion when reporting.

Bridge replacements

31. A number of local authorities commented on the current classification of bridge replacements in the new and improved infrastructure activity class (which is continued in the draft GPS 2015), preferring that such replacements be classified as maintenance. This is because the Agency's policy requires minor bridge replacements to be funded from territorial authorities' budgets for Minor Works which is, in some cases, the only funding they have for improvements (this is reflected in the submission of Gore District Council).
32. The Southland District Council thought that bridge renewals should be treated the same as a pavement renewal in terms of the analysis used to justify it.
33. The Dunedin City Council proposed a separate activity class for bridge replacement be investigated.

Results

34. A number of stakeholders (for example, AA and Trafinz) commented positively on the inclusion of 'results' for each activity class (Table 3 of the draft GPS 2015). The AA commented that this development will provide additional checks and balances when ensuring investments reflect the strategic direction and objectives of the GPS.
35. Some stakeholders however said that there is no link between the funding ranges and results and it would be better if the results were quantified using

targets (this is reflected in the submission of Roothing NZ/NZ Contractors' Federation).

Other

36. Some local government submitters are concerned that the merging of the public transport activity classes might result in major infrastructure projects in the major metropolitan areas encroaching on the funding available for public transport services in smaller areas.

Multi class focus areas

37. Several stakeholders commented positively on the inclusion of multi-class focus areas (for example, the submission from the AA).
38. Christchurch City Council would like to see a multi-class focus area for the Central City Recovery Plan. The Canterbury Regional Transport Committee would like to see an Earthquake Recovery multi-class focus area.

Resilience

39. A number of submitters support the increased focus on resilience in the draft GPS 2015.
40. There were a number of comments about the scope of resilience in the draft GPS 2015:
 - Stakeholders generally agree that resilience should cover investment to *prevent* disruption and investment that *responds* to disruption caused by events.
 - Stakeholders generally agree that resilience should cover both man-made events and natural events, with some suggesting that the draft GPS 2015 needs to clarify that natural disasters are included in the scope of resilience.
 - Some submitters suggested that the scope of resilience could be widened to cover issues such as fuel price volatility, an aging population, and climate change as these issues also have the potential to restrict access to employment, education, and markets (for example, Tauranga City Council).
41. Some stakeholders, including LGNZ and a number of local authorities, supported resilience being elevated to a key priority in the draft GPS 2015, alongside economic growth and productivity, road safety, and value for money. The reason for this suggestion is because of the potentially significant impacts on the transport system of the effects from climate change, oil-based fuel availability, fuel prices, and natural disasters such as the Christchurch earthquakes.
42. Local authorities from Northland also raised the issue of resilience, especially in the context of the impacts on their network of frequent extreme weather events in their area. They expressed concern that the cost of providing resilience on key routes is beyond their ability to fund, and further support is needed.

Improvements

Local road improvements

43. Stakeholders, particularly local authorities, support the proposed increases in the funding available in the draft GPS 2015 for local road improvements.
44. Many submitters from local government supported further increases in the allocation to local roads, or more emphasis in the funding allocations to local roads relative to State highways/RoNS. Other stakeholders also supported an increase in the allocation to local roads (for example, Federated Farmers).
45. Many of these stakeholders cited the importance of local roads to economic growth and productivity. For example, the Taupo District Council said that “economic growth and productivity commences at the farm or forest gate, many of which are on local roads”. In a similar vein, the Road Transport Forum noted the differentiation between State highways and local roads is overstated and that the first and last kilometres of a trip are equally important to freight.
46. Submissions noted, in support of further increases in funding for local roading, that local roads:
 - represent around 88% of New Zealand’s total road length and account for around half of the vehicle kilometres travelled (VKT) but receive only 30% of the infrastructure asset related funding.
 - transport a larger volume of raw product to processing facilities, whereas State highways are important in transporting processed products to export points
 - carry the inputs to, and the harvest from, the rural hinterland that generates much of the freight task carried on State highways
 - are the starting point for transporting a significant portion of exports
 - carry a higher proportion of heavy vehicles than is suggested by the difference in funding allocation between State highways and local roads
 - are over-represented in crashes resulting in fatal and serious injuries.
47. Some submitters noted the high value of local road projects which they consider are not receiving enough funding due to the focus on State highway projects.
48. Some local authorities also stated that roading network issues in their area are holding back realisation of economic growth and productivity improvements in their region, and further investment is warranted (for example, New Plymouth District Council). Other submitters noted that available funding for their area is decreasing despite growing freight volumes of agricultural products (for example, Ruapehu District Council).
49. However, some stakeholders expressed different views. For example, Business NZ noted the use of ratepayer funding for local roading (and public transport and walk cycling projects) already disproportionately impacts on businesses, and submitted all transport projects should be subject to the same robust benefit-cost analysis process.

50. The Christchurch City Council noted the significant land use changes and changed traffic patterns following the earthquakes, which are impacting on the local network and could lead to unanticipated localised capacity and safety issues that will need addressing.

State highways improvements, including RoNS

51. A large number of submitters supported investment in road infrastructure as it provides access to the centres of production. They point to the importance of primary industries to the New Zealand economy, and the importance of having good road networks to move goods from "farm gate to factory".
52. A large number of comments from submitters focussed on the size of the allocation for State highways and the RoNS programme.
- Comment on the existing and potential future RoNS was mixed. Stakeholders that have a RoNS in their region or are benefitting from RoNS close by generally support the programme (for example, South Waikato District Council). Some submitters supported the RoNS projects and stated these investments will drive economic development.
 - LGNZ expressed support for the RoNS, however noted that funding the RoNS should not be at the expense of maintaining the existing network and alternative modes of transport. LGNZ is also concerned that the current assessment process automatically gives a high strategic fit rating to State highway improvements. This makes it difficult for local and regional roads which also deliver high value.
 - Some stakeholders expressed concern that the GPS is "dominated" by large State highway projects to facilitate the RoNS programme (this is reflected in the submissions of New Plymouth District Council and Taranaki Regional Council) or that the proposed funding increases for this activity are disproportionate to the size and use of the asset (for example, Tauranga City Council).
 - Some submitters were not opposed to investment in large strategic roading projects, but noted that a programme of large projects being progressed more or less at the same time limits the ability of the Agency to fund other projects elsewhere in New Zealand. These submitters suggested a more staggered approach to the remaining RoNS would be better and also enable more funding to be allocated around New Zealand (this is reflected in the submissions of New Plymouth District Council and Taranaki Regional Council).
 - Some submitters raised a concern that the large investments in capital works will be detrimental to maintenance spending. Many of these submitters believe the government should not be prioritising such large capital expenditure over maintenance expenditure, given the state of some of our roads.
 - Some submitters expressed concern about the low benefit cost ratio of some RoNS projects, in particular when compared to the relatively higher benefit-cost ratios of local road projects (for example, Trafanz).

Maintenance

General

53. Most comments about maintenance funding were about the levels of available funding for local roads, and to a lesser extent, State highways.
54. Increases in the available funding for both State highways and local roads in the draft GPS 2015 were supported by a number of stakeholders including local authorities, the Agency, and Roothing New Zealand and the NZ Contractors' Federation.
55. There was also support from a number of local authorities, and organisations (including the Association of Consulting Engineers NZ and the AA) to the draft GPS 2015 seeking greater efficiency in the delivery of maintenance services. Some submitters, however, cautioned that the ability of local authorities to realise efficiencies in maintenance expenditure and "sweat the asset" will be variable, and there will be a limit to how much can be achieved.
56. A number of submitters expressed support for the ongoing work of the Road Maintenance Taskforce, noting that the implementation of the One Network Road Classification System will be important for delivering better efficiency in maintenance expenditure. The Agency emphasised the importance of ensuring that new business models and improvements recommended by the Road Maintenance Taskforce are fully implemented to secure efficiencies.

State highways and local roading funding increases

57. Some submitters, mostly local authorities, noted the disparity between the proposed increases in the available funding for local road maintenance (2.4 percent) and State highway maintenance (3.0 percent). Submissions on this issue included suggesting that:
 - the level of increase should be the same for both activity classes (for example, Ruapehu District Council)
 - the funding levels for State highway maintenance should be reduced as they are incongruent with the push to achieve value for money (for example, New Plymouth District Council).

Local road maintenance

58. The proposed increases in the local roading maintenance activity class were generally supported by local authorities and other stakeholders. A large number of submitters, including local authorities, industry and user representative groups, submitted that further increases are warranted.
59. Many of these stakeholders expressed concern that the proposed activity class allocation may not provide sufficient funding to maintain existing local infrastructure.
60. Federated Farmers, for example, stated its members have observed significant deterioration in the quality of the local roading network, particularly on gravelled

or unpaved roads. It noted the increases for local roads are “well short of roading cost inflation forecasts”. It considers that changes in road use particularly by heavier traffic, and the greater frequency and intensity of adverse events, will require significantly increased level of investment to maintain existing levels of services.

61. Many submissions supporting further increases for local road maintenance also noted the importance of local roads to economic growth and activity (see paragraphs 45 and 46 above).
62. Several local authority stakeholders commented there needs to be recognition that increased road maintenance is likely to arise from increased economic activity. In particular, forecast growth in freight will impact negatively on local and rural roads and cause deterioration. It was also noted that some roads were never built for the purpose they are now serving (this is reflected in the submissions of Hawke’s Bay Regional Council and Southland District Council).
63. Another submitter noted that the local roading network has an internal freight movement function via connections to State highways, and roads need to be fit for purpose for this function.
64. Many submitters expressed concern that the draft GPS 2015 funding allocation, which is intended to allow existing service levels to be maintained, will not deliver the draft GPS's stated objectives. One submitter said that significant economic gains can be made from comparatively little increases in funding on local roads.
65. A large number of rural councils raised concerns about the use of rural roads by heavy vehicles. They note that these roads were not designed for heavy freight traffic and the impact on maintenance costs is significant (for example, the submission from Southland District Council).
66. The Christchurch City Council considers there are significant maintenance issues on Christchurch local roads that will not be addressed by the Infrastructure Rebuild programme anticipated to be completed in 2016, and will require further funding support beyond 2016.

Regional funding

Regional improvements activity class

67. Most submitters who commented on this issue supported the creation of the regional improvements activity class (this is reflected in the submissions of Nelson City Council, Stratford District Council, Rangitiki District Council, Hawke's Bay Regional Council and Palmerston North City Council).
68. Other views about the regional improvements activity class included:
- the maximum available funding under this activity class should be increased (for example, New Plymouth District Council, Rangitiki District Council)
 - A need for clarification about who can access funding in this activity class, in particular the term "non-urban" needs to be clearly defined (for example, Hawke's Bay Regional Council)
 - the scope of this activity class should be broadened to focus more on achieving regional objectives and priorities (for example, Taranaki Regional Transport Committee)
 - the funding in this activity class should be able to be used for projects other than just roading improvements, particularly if there are non-roading projects which have regional priority
 - this activity class should exclude State highway projects
 - there must be a fair and equitable way of distributing funding in this activity class to ensure value for money and efficiency.

Accelerated Regional Roading package

69. Some submitters referenced the Accelerated Regional Roading package¹ (the ARRP) in their submissions. The New Plymouth District Council, for example, whilst supportive of Taranaki regional projects included in the ARRP, also expressed concern that the projects were not previously approved for funding within the GPS and National Land Transport Programme (NLTP) funding allocation system, and that the Government is having to fund these projects independently of this system.

Balance between major urban areas and smaller centres

70. Several local authorities sought clarification of the terminology around urban areas. For example, the Waikato Regional Transport Committee asked for clarification on whether centres such as Hamilton are a "growing urban area".
71. The Road Transport Forum commented that "regional equity issues are raised when rural and urban taxpayers massively subsidise the travel of people living in a few large urban areas".
72. Some submitters state that more priority needs to be given to investment in the regional productive base of the economy, where strong economic growth is occurring (for example, Palmerston North City Council).

¹ On 29 June 2014, the Government announced funding to accelerate a package of regionally important State highway projects, drawing on the Future Investment Fund.

Public transport

Overall levels of funding for public transport

73. Many local government and other submitters sought an increase in the public transport funding ranges. The reasons for this were varied and included:
- *Inflationary pressures* – many local government submitters considered the rate of increase in public transport funding (of 3.0 percent per annum) represented a decrease in real terms, given the level of escalation in public transport operating costs (this is reflected in the submissions of Horizons Regional Council, Tauranga City Council and Taranaki Regional Transport Committee).
 - *Investment needs* – local government submitters from the three largest public transport markets of Auckland, Wellington and Canterbury submitted that the proposed upper limit of the funding range was not sufficient to meet their proposed expenditure plans or patronage targets (Auckland Transport, Auckland Council, Greater Wellington Regional Council, Environment Canterbury, Christchurch City Council). Similar comments were made by Generation Zero.
 - *Better value from investment in public transport* – a number of submitters expressed concern with the current focus on new roading investments. They consider that investment in public transport and walking and cycling are of greater value.
74. Auckland Transport and Auckland Council suggest there is potential for funding allocated to the State highways improvements activity class to be reallocated to public transport in later years, as the RoNS and the Auckland network are completed.
75. Some submitters said that any funding of public transport projects from road user taxes should be commensurate with the benefits to road users through an easing of congestion (this is reflected in the submissions of the AA and Road Transport Forum).

Focus for public transport investment

76. Some local authorities outside of the main urban areas expressed concern that public transport investment is too focussed on:
- increasing capacity only on main routes in growing urban areas
 - mitigating congestion.
77. Provincial local authorities raised concerns that the overwhelming investment focus was on the major urban centres only, precluding the development of services in mid-sized, small and more rural areas that sit below this threshold.
78. These submitters argued that public transport can make a contribution to a community's economic and social development by providing access to employment and educational opportunities, but it is harder to secure investment for this type of service. These stakeholders said they would like to see more services subsidised, particularly services outside of the large urban areas. Several commented that such services could be cost effective, with little

overall impact on subsidy levels or farebox recovery goals. Others commented that it should be recognised that higher subsidy levels are required for services aimed at the transport disadvantaged (this is reflected in the submissions of Horizons Regional Council, Northland Regional Transport Committee, Bay of Plenty Regional Transport Committee, Hawke's Bay Regional Transport Committee and Dunedin City Council).

79. These submitters considered there needed to be more funding provided for new or expanded services in these medium sized and smaller areas. This was also expressed as a need for greater scope for proposals to be determined on their merits, rather than be pre-determined by location or population density (for example, the submissions from Bay of Plenty Regional Transport Committee, New Plymouth District Council, Hawke's Bay Regional Council and Horizons Regional Council).

Merging of public transport activity classes

80. Most stakeholders who commented on this matter supported the merging of the public transport services and public transport infrastructure activity classes. However some local government submitters expressed concern that the new configuration might mean that major improvement projects in the major metropolitan areas could encroach on the funding available for public transport services.

Other public transport issues raised

81. The AA wanted more emphasis on advising users that a significant proportion of each public transport trip is funded by revenues raised from road users.
82. Table 5 of the draft GPS 2015 sets out the expected additional funding for land transport other than NLTF funding. Some submitters raised a concern that the annual Crown appropriation for the Super Gold card concessions (in Table 5) is not forecast to increase (for example, Auckland Transport, Taranaki Regional Transport Council, Stratford District Council, Canterbury Regional Transport Committee). One submitter noted that demographic data suggests increasing numbers of New Zealanders will become eligible to access this initiative.
83. A number of submitters raised concerns with the reference in the draft GPS 2015 to the need for "consolidation of public transport investment before new investment is made". They argue that if roads are invested to anticipate future demand, then the same approach should be taken to public transport, ie investment should also be ahead of patronage growth.
84. Some stakeholders expressed concern regarding the qualifier "at reasonable cost" used for the funding of projects in this activity class. They pointed out that public transport has a relatively high benefit-cost ratio compared to state highways and local roads, yet these activities do not have this qualifier.

Walking and Cycling

85. Many submissions received on the draft GPS 2015 supported further increases in the funding available for cycling, including:
- all the submissions from members of the public using a template submission from the *On Yer Bike* website²
 - many of the submissions from individual members of the public
 - a number of submissions from local authorities (including New Plymouth District Council and Taranaki Regional Transport Committee).
86. Because of the numbers of submissions generated from the *On Yer Bike* website, a summary of these submissions is provided separately below.
87. Only a few (late) submissions commented on the Government's Urban Cycleway Package³, as this was announced after the formal engagement period for the draft GPS 2015 had closed.

On Yer Bike cycling submissions

88. A total of 3,490 submissions were received using a template generated from the *On Yer Bike* website. In summary, the key points from the standard *On Yer Bike* template submission are:
- safety issues when cycling are a barrier to more people choosing cycling as a viable transport mode
 - cycle networks and safe infrastructure like protected cycle lanes have the potential to give people a viable choice about cycling, but more investment is needed to realise this
 - the available funding for cycling in the draft GPS 2015⁴ should be trebled over the next three years, with progressive increases after that
 - the Agency should take an active leadership role in improving cycling, and to provide more funding for cycling-specific projects
 - surveys conducted in Auckland, Dunedin, and by the AA indicate there is demand for safe cycling facilities (the submission states that more than 60 percent of Kiwis would cycle around town if it were safe).
89. Some (301) of the *On Yer Bike* template submissions included additional comments from submitters. The additional comments generally included:
- references to specific cycling projects or initiatives that:
 - have already been implemented and are successful (for example, the Model Community projects in Hastings and New Plymouth)
 - submitters would like to see planned or progressed in their local area, in particular to address safety issues with cycling on particular routes

² Submitters could enter the website, provide their details and generate a form submission with or without extra comments.

³ On 18 August 2014, Prime Minister John Key announced that \$100 million in new funding will be made available over the next four years to accelerate cycleways in urban centres. This funding will not come from the NLTF.

⁴ That is, increasing the lower band in the relevant Activity Class from \$15 million to \$45 million and increasing the upper band in the relevant Activity Class from \$30 million to \$90 million per year for the next three years with progressive increases after that.

- references to safety issues associated with cycling, including:
 - current cycling infrastructure and facilities not being separated from other road traffic or being disconnected and fragmented
 - the attitudes of road users, particularly private motorists, to cyclists
 - these type of issues being a barrier to more people taking up cycling as a transport mode, particularly for commuting (as opposed to recreational cycling)
- references to the need for better education about cycling, not only for cyclists, but for all road users
- references to the potential benefits of cycling including:
 - environmental and health benefits
 - economic benefits, for example the business and tourist opportunities associated with cycling, and the potential for cycling to take on a greater share of the transport task and reduce road congestion
- reference to responding to changes in transport mode choice: the shift away from car use to other modes of transport including walking and cycling
- reference to the need to future proof new infrastructure by building cycle networks into them.

Other submissions about walking and cycling

90. As noted above, a number of stakeholders, including many local authorities (including New Plymouth District Council, Taupo District Council and Tauranga District Council) and national organisations including the Cycling Advocates' Network and the New Zealand Cycling Safety Panel) agreed that walking and cycling provide alternative and affordable transport choices, and called for more funding for cycling. Many of those commenting on this issue referred to the benefits of providing more funding for walking and cycling infrastructure and education, particularly:
- increased safety
 - increased perceived safety for cyclists
 - improved health outcomes
 - reduced emissions.
91. Whilst the success of the model communities approach was applauded by some, there was also a view expressed by some local government stakeholders that it would be equitable for the focus to now shift from model communities to support for cycling projects around New Zealand.
92. A number of submitters also expressed concern regarding walking and cycling having the qualifier "at reasonable cost" used for the funding of projects in this activity class. They also stated that walking and cycling has a relatively high benefit-cost ratio compared to state highways and local roads, yet these activities do not have this qualifier.

93. Some submitters commented on the historical underspend in the walking and cycling activity class and suggested that the FAR for this activity needs to be increased.
94. Some local government stakeholders expressed concern that the draft GPS 2015 does not explicitly mention investment in walking, and sought clarification that the Walking and Cycling activity class can include investments for walking facilities and infrastructure (for example, New Plymouth District Council).
95. The Road Transport Forum believes that active transport modes should be encouraged but should not be funded from the National Land Transport Fund. Instead, such initiatives should be funded using general taxation, rather than from hypothecated land transport revenue.

Rail and coastal shipping

96. Some submitters were concerned the draft GPS 2015 does not include investment in rail freight services and infrastructure or coastal shipping. Some submitters see a disconnection between road, rail and coastal shipping. A solution suggested is that a long-term approach is needed by Government to incorporate all land transport functions into a single framework, such as the GPS.
97. Some submitters felt there needs to be a greater coordination of strategy between road and rail (for example, South Waikato District Council), and a safe land transport system could only be achieved if both rail and road had similar guidance and focus (for example, Ashburton District Council).
98. One submitter (Stratford District Council) indicated that with increased freight demand forecast, and the potential for damage to roading infrastructure from this increase, alternative forms of transport, such as rail, should be encouraged.
99. South Waikato District Council see the inclusion of further narrative around the coordination of rail freight and land transport investment activities where benefits can be demonstrated achieving the GPS objectives.
100. The Road Transport Forum said that most efficient mode of transport should be used but this is not possible unless rail competes on a neutral basis with roading. They suggested roading is currently funded on a user-pays basis while rail freight also receives funding from general taxation.

Benefits to road users

101. Several submitters proposed that that revenue from land transport revenue should be used for the benefit of road users, which means that the funding of public transport (and active transport modes) must be commensurate with the benefits that road users receive such as reduced congestion (this is reflected in submissions from Road Transport Forum, the AA, the NZ Council for Infrastructure Development and Business NZ).
102. Other submitters noted that local councils, through rate payers, also co-fund public transport and other activities so a wider view than just benefits to road users is warranted (for example, LGNZ). The Bus and Coach Association also submit that the current evaluation methodologies underestimate the contribution investment in public transport can make to the economy.

Future Demand and demand management

103. Some submitters believed the draft GPS 2015 needed to include more thinking about future demand and future travel patterns. Of particular concern to submitters were:
 - changing demographics
 - changing oil use
 - climate change
 - flattening of vehicle kilometres travelled.

104. A number of submitters suggested new transport technologies may be a way to address current and future demand, and ensure it is catered for. Submitters suggested these technologies have potential to improve efficiency of land transport systems.
105. Several submitters suggested that mention needs to be made of the strong growth in demand for public transport patronage particularly in Auckland (for example, the submission from Generation Zero).

Other Issues

Ministerial expectations

106. Only a few submitters commented on the addition of Ministerial expectations in the draft GPS 2015, and overall were supportive of their inclusion.

Monitoring and reporting

107. Some local authorities want the Ministry of Transport to play a bigger role in their interaction with the Agency around the implementation of the GPS, for example through enhanced monitoring.
108. The Agency supported the introduction of an enhanced reporting regime in the draft GPS 2015.
109. There is some concern from local government stakeholders that increased reporting requirements proposed in the draft GPS 2015 will increase the burden on local authorities without the necessary support.

Revenue tools and sustainability of funding base

110. A few stakeholders (including the Motor Industry Association and Association of Consulting Engineers NZ) commented or made recommendations about possible additional revenue tools, generally because they are concerned about the sustainability of funding required.
111. The New Zealand Council for Infrastructure Development submitted that there is a need for new and innovative funding methods to enable a step-change needed in transport infrastructure.

Intelligent Transport Systems and emerging vehicle technology.

112. Some stakeholders commented that the draft GPS 2015 needs to be stronger in this area, (for example, the submissions of the Motor Industry Association, Association for Promotion of Electric Vehicles and NZ Council for Infrastructure Development).
113. Some stakeholders thought the draft GPS 2015 should include reference to the role of the Government in supporting the wider adoption of electric vehicles. This support could include allocating specific funding to assist the acceleration of investment in charging infrastructure. The amount sought was in the order of \$1-2 million per annum (this is reflected in the submissions of the Motor Industry Association and Association for the Promotion of Electric Vehicles).

114. There was one submission (from the Association for the Promotion of Electric Vehicles) which sought to have the GPS include reference to electric bicycles.

Motorcycling

115. Motorcycle interest groups commented that the draft GPS 2015 makes no reference to motorcycles or motorcycling safety (including submissions from the Motor Industry Association and Motorcycle Safety Advisory Council).
116. The Motorcycle Safety Advisory Council noted the 77 percent increase in motorcycle use for journey to work trips in urban areas between the 2006 and 2013 Census, which is the highest percentage increase for all modes.
117. These stakeholders sought specific funding for investment in making roads more “motorcycle friendly”. This would be consistent with the Safer Journeys Strategy which identifies motorcycling as a high risk transport activity, and ACC work noting the high level and costs of motorcycle accidents
118. The Motor Industry Association would like high use recreational motorcycling routes to be targeted under the GPS, with specific funding of around \$10-\$15 million per annum allocated to provide for improved road design and maintenance on these routes, using lessons learnt from the Agency’s pilot programme on the Southern Coromandel loop.

National land transport objectives

General

119. In general most submitters who commented on the national land transport objectives in the draft GPS 2015 supported their inclusion (including the submissions from LGNZ, Tauranga City Council, South Waikato District Council, Ruapehu District Council and Palmerston North City Council), although there were a number of comments about the scope and detail of specific objectives (see below).
120. A number of submitters indicated that whilst they support the range of objectives, they considered proposed funding allocations to be too focussed on roading improvements, private vehicles and freight, and that more emphasis on public transport and walking and cycling is needed across the suite of objectives (for example, Tauranga City Council).

Objective: Addresses current and future demand

121. In general, most submitters who commented on this objective supported its inclusion.
122. A number of submitters felt that there should be more reference in this objective for investment in demand-side and demand management initiatives with the potential to maximise the efficient use of the existing transport network to minimise the requirement for new transport infrastructure investment (for example, the Taranaki Regional Transport Committee).

Objective: Provides appropriate transport choices

123. In general, most submitters who commented on this objective supported its inclusion.
124. Some submitters indicated that there should be more funding for activities which support this objective, for example active modes and public transport.

Objective: Is reliable and resilient

125. In general, most submitters who commented on this objective supported its inclusion.
126. A number of submitters suggested that the scope of this objective could be widened to cover issues such as fuel price volatility, an aging population, and climate change as these issues also have the potential to restrict access to employment, education, and markets.

Objective: Is a safe system increasingly free of death and serious injury

127. In general, most submitters who commented on this objective supported its inclusion.
128. A number of submitters did not think the draft GPS 2015 allocated enough funding to really enable a safe system approach to road safety.

APPENDIX ONE: LIST OF SUBMISSIONS RECEIVED

City, District or Regional Council	
Auckland Council	Rangitikei District Council
Auckland Transport	Ruapehu District Council
Ashburton District Council	Selwyn District Council
Christchurch City Council	Southland District Council
Dunedin City Council	South Waikato District Council
Environment Canterbury	Stratford District Council
Far North District Council	Taupo District Council
Gore District Council	Tauranga City Council
Hamilton City Council	Timaru District Council
Hastings District Council	Waimakariri District Council
Horizons Regional Council	Waimate District Council
Kaipara District Council	Waitaki District Council
Manawatu District Council	Wellington City Council
Nelson City Council	Western Bay of Plenty District Council
New Plymouth District Council	Whakatane District Council
Northland Regional Council	Whangarei District Council
Palmerston North City Council	

Regional Transport Committees

- Bay of Plenty Regional Transport Committee
- Canterbury Regional Transport Committee
- Hawke's Bay Regional Transport Committee
- Manawatu-Wanganui Regional Transport Committee
- Otago Regional Transport Committee (joint submission with Southland Regional Transport Committee)
- Northland Regional Land Transport Committee
- Southland Regional Transport Committee (joint submission with Otago Regional Transport Committee)
- Taranaki Regional Transport Committee
- Waikato Regional Transport Committee
- Wellington Regional Transport Committee

Other Organisations

- Association of Consulting Engineers New Zealand
- Association for Promotion of Electric Vehicles
- Auckland Transport
- Auckland Regional Public Health Service
- BikeNZ
- Bus and Coach Association
- Business NZ
- Canterbury District Health Board
- CCS Disability Action
- Cycle Aware Wellington
- Cycling Advocates' Network
- Engineers for Social Responsibility Inc
- Federated Farmers of New Zealand

- Frocks on Bikes Aotearoa
- Generation Zero
- Hutt Cycling Network
- Imported Motor Vehicle Industry Association
- Institution of Professional Engineers New Zealand (IPENZ)
- Living Streets Aotearoa
- Living Streets Aotearoa – Wellington
- Local Government New Zealand
- Motorcycle Safety Advisory Council
- Motor Industry Association of New Zealand
- New Zealand Automobile Association
- New Zealand Contractors' Federation and Roothing New Zealand (joint submission)
- New Zealand Council for Infrastructure Development
- New Zealand Cycle Safety Panel
- New Zealand School Speeds
- New Zealand Transport Agency
- Nga Haerenga The NZ Cycle Trail Inc.
- North Taranaki Cycle Advocates
- OraTaiao: NZ Climate & Health Council
- Port of Napier
- Public Health Association Otago-Southland
- Road Transport Forum
- Seniors United to Promote Age-friendly New Zealand Incorporated
- Southern District Health Board
- Spokes Dunedin
- Spokes Canterbury
- New Zealand Local Authority Traffic Institute (TRAFINZ)
- Venture Taranaki
- Wellington Civic Trust