Analysis of Submissions - Regional Land Transport Strategy (RLTS) Strategic Options

1. Provision of information within the document

1.1 Several submitters raised issues relating to inadequate provision of information within the document. The submitters noted a lack of supporting or background information provided to ensure general public understanding, lack of information about detailed costs and projects involved with each option, and the need for a greater variety within the options.

Comment

The Strategic Options Consultation Document was supported by a background technical report which provided further information and explanation behind analysis of the three strategic options. The consultation document referred readers to this technical report for further information.

Sections 5.1 and 5.2 of the consultation document provide further explanation about the types of projects which might be included or excluded under the various scenarios. It should be noted however that the purpose of the consultation document was to obtain views on the three scenarios at a strategic level rather than on detailed project level.

2. Further issues to be addressed

Throughout the submissions some common themes were raised with regard to issues not being identified, and their consequent exclusion from the vision, objectives and outcomes.

2.1 Carbon dioxide emissions and the Kyoto Protocol

2.1.1 Many submitters suggested that the document failed to adequately take account of Kyoto Protocol and subsequent carbon dioxide standards that will be set in place at a national level. In contrast the Federated Farmers of New Zealand (Inc) believed that the control of carbon dioxide and emissions should be regulated at the national level and not through regional strategies.

2.1.2 Other submitters highlighted the importance of environmental sustainability, including emissions, but considered that solving transport problems in the short term should be the first priority before tackling wider environmental issues.

Comment

The Kyoto Protocol commits New Zealand to reducing its greenhouse gas emissions back to 1990 levels, on average, over the period 2008 to 2012 or to take responsibility for any emissions above this level if it cannot meet this target. Transport contributes around 46% of New Zealand's greenhouse gas emissions, therefore it is important that the transport sector addresses CO_2 emissions. Regional Land Transport Strategy's (RLTS's) can contribute to New Zealand's Kyoto targets, however many initiatives to reduce emissions will need to be implemented at the national level.

CO_2 emissions are identified in the document under Transport Sustainability 2.2.8, in addition to Objective 5 and under Travel Demand Management Outcomes. CO_2 was

also used as an indicator in the analysis of the three scenarios against the draft RLTS objectives and outcomes (pages 14 & 15).

It is recommend that a section which provides further explanation and discussion of this issue and long term sustainability is included in the new RLTS.

2.2 Potential rising fuel costs

2.2.1 The feedback raised some concern that the consultation document appeared to only address the 'status quo' in terms of transportation related issues, and failed to consider the impact of future potential price rises in petrol, which may in turn encourage greater use of passenger transport (PT), walking and cycling.

Comment
Recent increases in petrol prices internationally and within New Zealand are beginning to have an impact on the transport system and will continue to do so if prices continue to rise. While the timing and extent of rising oil prices is still unclear, as is the extent of travel behaviour change as a result, the issue certainly warrants consideration within the new RLTS. It is recommended that the draft RLTS include a section to discuss the effects of rising oil prices on the transport system.

It is also recommended that rising oil prices be given some consideration in selecting a preferred strategic option and in developing the detailed transport programme. It is noted that should petrol prices continue to rise steeply resulting in a significant slowing of traffic growth, congestion may not increase under Option 2 to the extent anticipated in the analysis.

2.3 The ten year timeframe and environmental sustainability

2.3.1 Several submitters, including Land Transport New Zealand (Land Transport NZ) and Transport 2000+ New Zealand, identified the need for longer term planning to provide for environmental sustainability, and to address intergenerational equity in investment. There was some concern raised in relation to the definition of 'environmental sustainability' and it was also suggested that the seven sustainable transport system principles could be better incorporated into the document.

Comment
Note that it is a statutory requirement that RLTS's must be developed for a timeframe of not more than ten years. However, while focusing on the statutory 10 year planning period, it is recommended that the new RLTS include a longer term context of at least 20 years, in accordance with the Wellington Regional Strategy (WRS).

Recommend the further consideration of the environmental sustainability objective, in terms of both definition and appropriate indicators during development of a draft RLTS. A Strategic Environmental Assessment (SEA) of the draft is also to be undertaken to ensure these issues have been adequately addressed.

2.4 Accessibility, health, disability and an aging population

2.4.1 Health-related organisations (including Regional Public Health and the Capital Coast DHB) identified several matters that they believed were not adequately addressed. In particular, it was considered that Objective 4 should be widened to include improving the accessibility of transport to children and young people, the elderly, people with disabilities and those in communities without access to facilities such as health care.

Comment
The Committee may wish to give consideration to widening the definition under Objective 4, however it is noted that the above issues are largely covered under Objective 3 'improve access, mobility and reliability' which states *Transport should provide for the access and mobility needs of our regional community. Improving them is the primary purpose of a RLTS. Improving access enables social participation, inclusion and independence and improving mobility ensures the availability of realistic transport choices for the individual or community, including affordability and equity of cost considerations.*

The new RLTS will need to be mindful of an aging population and provide a transport system which caters for accessibility of all, including the elderly and people with disabilities, within the community. These issues are currently being considered through development of the Regional Passenger Transport Plan (RPTP) and the through the Total Mobility scheme.

2.4.2 Similarly, it was noted that the health benefits of decreased vehicle emissions and cleaner air should be taken into account, as should the health benefits of increased levels of active transport when comparing the strategic options.

Comment
It is noted that decreased emissions, reduced air pollution, and increased opportunities for physical activity are included as indicators in the analysis of the strategic options against the draft RLTS objectives.

A Health Impact Assessment (HIA) is to be carried out on the draft RLTS in order to identify any gaps or improvements to the draft strategy. This will be undertaken once a preferred option has been developed by the RLTC and prior to the next phase of consultation.

2.5 Better integration of land use planning and transportation planning

2.5.1 A need was identified for better integration of transportation planning and land-use planning. Issues ranged from the need for safety and beautification of streets to greater encouragement of passenger transport usage to the need for social sustainability of new transport proposals. Several submitters noted that the social effects in relation to community severance by rail or road developments were not incorporated into the document.

Comment
The RLTS review is coordinated with the development of the WRS, with consultation of the WRS Growth Framework document aligned with the Strategic Options consultation process. Feedback from the WRS process will be used to inform the

development of the draft RLTS, particularly with respect to integrating future transport and land use development.

Consideration should be given to adding new policies, objectives, outcomes to address social sustainability and community severance in relation to new transport infrastructure.

2.6 Consideration of freight

2.6.1 Several submissions emphasised the importance of freight movements to regional and national economic development, with some suggesting freight transport had not been adequately addressed. At the hearings, the fact that short distance freight journeys generally have no alternative to road was raised and the associated importance of the cross valley link emphasised.

Comment
Freight issues are discussed under section 2.2.6 of the consultation document, and reduced Heavy Commercial Vehicle (HCV) costs are included as an indicator under the analysis of the strategic options against the draft RLTS objectives. In addition, current draft RLTS policies (not included in the consultation document) relating specifically to freight are:

- **Support rail freight initiatives where benefits exceed those of road freight**
- **Provide for an appropriate transport network for freight and commercial needs.**

However, it is acknowledged that freight issues are absent from the draft RLTS outcomes and additional land transport outcomes relating to freight are recommended. A Regional Freight Strategy is in the early stages of development and will eventually be included as part of the RLTS to address freight issues in more detail and outline specific actions.

2.7 Other issues identified during hearing of oral submissions

2.7.1 It was proposed that the vision take a longer term view and include the word 'people' rather than 'prosperity' to cover the social considerations of the RLTS.

Comment
Amendment to the vision should be given consideration.

2.7.2 Submitters questioned the adequacy of the way environmental sustainability was measured through the indicators in the tables.

Comment
It is noted that while the environmental sustainability objective in the analysis tables only included CO_2 emissions as an indicator, there other measures of environmental impact within the tables under other headings such as fuel use, air pollution, traffic noise. However it is reasonable to consider whether additional indicators are appropriate – see comments under 2.3.1 above.

2.7.3 During the hearing of oral submissions, a need was identified to provide further explanation of the analysis tables and the conclusions, particularly regarding congestion, CO_2, and cycling.

Comment
It is important to note firstly that the analysis tables show each scenario compared to the 2001 base year, rather than against each other.

<u>Congestion</u> – Both the Planned Investment and Advanced Roading scenarios result in a neutral impact on road congestion. Congestion does not increase under these scenarios as sufficient investment is made in roading improvements to accommodate growth in car use. Under the Advanced Passenger Transport scenario, the reduction in roading investment means that even with a mode shift to passenger transport as a result of service enhancements, the growth in traffic VKT will mean congestion levels increase.

<u>CO_2</u> – While the Advanced Passenger Transport and Planned Investment scenarios are likely to have a minor positive impact on CO_2 compared to business as usual, none of the three scenario's positively impact on CO_2 levels compared with the 2001 base year.

<u>Cycling</u> – Cycling is expected to decline as a proportion of all trips under all scenarios due to a faster level of growth in car use and other modes compared to cycling. Investment in cycling infrastructure is largely dependent on limited local funding through LTCCP processes, and as such cycling level of service and perceived safety of cycling is also expected to decline under all scenarios.

2.7.4 There was a strong theme raised regarding the need to consider linkages between corridors, in particular east-west connections.

2.7.5 Several submitters emphasised the need to consider local travel needs, rather than just focusing on arterial commuter routes.

2.7.6 Concern was often raised regarding the cost, who pays and affordability, with a general consensus that central government (and in some cases the user) should contribute more.

2.7.7 The need to prioritise the north/south strategic route as a national priority over regional priorities.

2.7.8 The need to recognise the concept of the sustainable city was emphasised. It was suggested that the RLTS should be about more than just 'transport' but should involve influencing travel behaviour, travel choices, urban form, etc.

2.7.9 The need to recognise the importance of Civil Defence as a major issue and address a current lack in weighting eventualities and options.

2.7.10 The need to address all trip types, not just commuter trips on strategic routes.

2.7.11 The need for the RLTS to include explicit linkages with other strategies and plans.

2.7.12 The need to consider the Hataitai tunnel, the Wellington City Gateway project and the Cook Strait within the RLTS.

Comment
The above points will be considered during the development of the draft RLTS.

3. Passenger transport verses roading

3.1 Approximately half of the submitters felt strongly that increasing expenditure on passenger transport is the only acceptable solution to ensuring a sustainable transport system for our region. A large number also disagreed with the conclusion that Option 1 (Planned Investment) was the best option for the region.

Comment
Analysis of the strategic options found that the Planned Investment scenario performed best against the range of RLTS objectives and outcomes. The analysis showed that the Advanced Passenger Transport scenario improved passenger transport mode share and had significant health and safety benefits, however the trade off was increased congestion as a result of low investment in roading improvements under this scenario. Given the strong support for enhanced PT through the submissions, the RLTC may wish to consider increased investment in PT during development of the draft RLTS.

3.2 There were also a small number of submitters who provided considered support for the Advanced Roading option. These submissions tended to identify the importance of roading improvements as necessary to accommodate regional and economic growth and minimise the impacts of worsening congestion, particularly on high priority routes and corridors.

Comment
Consideration should be given to these views and the potential impacts of reduced roading improvements during development of a preferred option.

3.3 A widespread response to Outcome 4.2 was that the passenger transport share should be ‘enhanced’ rather than ‘maintained’. A large number of submitters also believed the word ‘maintain’ should replace ‘reduce’ in Outcome 4.1 regarding road congestion.

Comment
It is recommended that consideration be given to the wording of this passenger transport outcome and whether an amendment from ‘maintain’ to ‘enhance’ peak period mode share is appropriate. This is issue is currently being considered through development of the RPTP.

No change is recommended to the existing roading outcome to ‘reduce’ road congestion.

3.4 Concern was also raised about the apparent focus on rail when other options such as Bus Rapid Transport (BRT) had been omitted.

Comment
This issue is most appropriately considered through the RPTP development process.