



## SUBMISSION

### Transit New Zealand

#### Draft 2005/06 10-Year State Highway Plan

## 1. Introduction

The Cycling Advocates' Network (CAN)<sup>1</sup> is pleased to present this submission on Transit's Draft 10-Year SH Plan. The national executive of the group has prepared this submission, with feedback from CAN members. We have based our submission on examination of the relevant documents posted on Transit's website. Some of our local member groups may also be making separate submissions specific to their Transit region. If you require clarification of any of the points raised by us, please feel free to contact us as detailed at the end of our submission.

## 2. General Comments

Overall, Transit's 10 year Plan appears to be "business-as-usual" – predict (more traffic) and provide (more road capacity), with the main thrust still being more and more road building. We believe that Transit NZ has still to demonstrate an understanding that it cannot build its way out of congestion. We would like to see significant changes to the final Plan to bring it into compliance with underlying legislation.

On page 5 of the plan, input is requested as follows:

"Your contribution to developing Transit's draft SH Plan is very important, and will help to improve the Plan. Therefore, we ask you to:

- Comment on the regional transport issues, packages and strategies
- Comment on the proposed maintenance levels of service
- Comment on the improvement activity priorities:
  - For your region
  - Regional allocations
- Provide reasons for any recommended changes."

Transit's focus is thus on regional submissions. Where does the national interest get considered? Will there be a consultation mechanism to consider the national implications of the plan, and regional allocations relative to each other? We request that this be addressed in the final Plan and in future editions of the Plan. We also request the opportunity to present this and other key points of our submission in person at a hearing.

The summary document (some 25 pages) has a table on page 13 of planned expenditure by output class totalling over \$10 billion over the 10-year Plan period. But it does not contain a similar table of expenditure by region, making it difficult for the lay reader to comprehend the plan's financial implications from a regional equity perspective. We request such a table in the final Plan. Similarly, for each region, within the appendices, summaries of expenditure by output class for the region would be beneficial.

In addition, we believe that Transit's Auckland region consumes much more of the national transport budget proportionately than even its enlarged population warrants. From a national perspective, we believe that further

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<sup>1</sup> More information about CAN is at the end of our submission.

highway expansion in the Auckland region will result in further unsustainable land development and increased levels of traffic congestion. This beast cannot be tamed by business-as-usual.

For example, one project in Auckland Region, the Central Motorway Junction, has committed funding of about \$200 million, nearly one sixth of the region's committed works. This is larger than the entire committed works programme for any other region. The second biggest consumer, Waikato (which is effectively a dormitory suburb for Auckland as a result of Auckland's unsustainable growth), has committed works of "only" \$165 million). The rest of New Zealand is cross-subsidising Auckland's low-density urban sprawl and car dependence.

The Land Transport Management Act acknowledges the need to move towards more sustainable transport systems but this 10-Year Plan scarcely begins to recognise this. Lip service is paid to travel demand management, but little information exists within Transit's documentation as to what this means or how this will be implemented. In addition, there are a number of token walking and cycling projects, but these comprise about 0.1% of the total expenditure. If Transit projects provided adequate walking and cycling facilities as part of every package, we would be less concerned about the insignificant amount spent on these facilities in separate projects (ie those listed in Appendix K). We have little confidence that the NZTS objectives will be achieved until walking and cycling are integrated in all packages.

We acknowledge that this is the first 10-Year plan that Transit NZ has prepared under the provisions of the new LTMA, and we commend you for moving straight to the new processes and not taking refuge in the interim provisions. However, because this is a new policy environment, we believe it is particularly important to offer a strong critique of this Plan and the assumptions behind it.

### 3. Transit's Planned Contribution to the Land Transport System

(Page 11 of the consultation document)

The Plan makes some value-based assessments of how it contributes to the objectives of the New Zealand Transport Strategy. We take issue with many of these as follows:

Extract from 10-Year Plan	CAN Comments
Assisting Economic Development	
• Reducing congestion and progressing the integration of facilities. This includes:	
- Enhancing travel demand management particularly in Auckland, Tauranga, Wellington and Christchurch	Admirable. What proportion of the funding is going to this item, however? Show us the money!
- Assisting in the provision of passenger transport (bus and rail)	Ditto
- Improving traffic management on the existing highway network	Reasonable
- Integration of cycling and pedestrians into projects,	What safeguards are there to ensure that this happens in all cases?
- Providing where possible additional road capacity for vehicle and freight movement.	What proportion of the funding goes here? Probably the lion's share. There is incontrovertible evidence that we cannot build our way of congestion.
Assisting Safety and Personal Security	Where is discussion of the negative effects of increased traffic volumes and speeds on road safety, especially for pedestrians and cyclists?
• Providing enhanced road delineation/signage	
• Improving skid resistance	
• Progressive safety retrofitting to remove hazards	
• Other safety improvements eg route treatments, median barriers, and rural realignments	
• Working with other agencies such as the Police to provide surveillance, including cameras	
• Improving street lighting.	

Improving Access and Mobility	This component suggests that those currently with the least access and mobility would be better catered for. Instead, those who already consume most of the transport cake in terms of person kilometres travelled get more access and mobility while those at the bottom of the pile get less, as new roads are built and existing roads are widened. People walking and cycling typically have less access and mobility through "severance" effects, created when priority is given to those travelling through local communities on state highways. A meaningful discussion about this issue and how Transit NZ intends to address it would be helpful here.
• Asset preservation	
• Improving procedures for event response to keep state highways open	
• Protecting and managing access onto State Highways	
• Proactive route security eg seismic retrofitting of structures	The Plan caters for traffic growth in the range of 2% to 4% per annum (and 6% for truck traffic). These rates far exceed population growth. Where is the discussion about the increase in emissions that will be caused by this traffic and its effects on public health? It is implied in the Regional assessments of 'large activities' that improving traffic flows reduce emissions (thereby 'managing effects on air quality'), but history has shown that increased road capacity is usually short lived, with traffic expanding (and congesting) to fill all available capacity. Most OECD countries have long come to the conclusion that increasing road capacity is a road to nowhere. Our health officials are warning us of a health epidemic caused by inactivity, and car crashes are responsible for a large proportion of all hospitalisations and long term disability. A more motorised society (an inevitable outcome of the 10-Year Plan) will exacerbate these trends.
• Network wide Travel Demand Management, bus priority lanes, and traffic management units in Auckland and Wellington.	
Protecting and Promoting Public Health	In our view this is tokenism. While traffic growth remains unchecked, increasing road capacity and decreasing travel times for motorists as planned further undermines the viability of walking and cycling.
• Providing cycling and walking facilities, either stand alone or as part of other activities	
• Working with local authorities to complement cycling and walking networks	
• Promoting healthy lifestyles and better health.	
	Admirable. Show us the money!
	Admirable. Show us the money!
Ensuring Environmental Sustainability	
• Reducing fuel consumption / emissions by providing smoother roads, addressing congestion and shortening routes	Traffic expands to fill the available capacity. An important component for long-term viability is road and parking pricing. Transit NZ needs to commit to no further capacity increases and to manage better the assets we have.
• Implementing Transit's Environmental Plan eg noise mitigation, graffiti control, landscaping, stormwater mitigation	How is Transit NZ planning to assist the country in meeting our Kyoto Protocol obligations, reducing our ecological footprint and reducing urban sprawl and greenfield development?
• Use of tunnels / viaducts to protect natural environment	In our view this is tokenism. It should be a priority to look for an alternative solution so that the facility is not built in the first place.
• Ensuring continued, and extending, social cohesion and integration in project development	There is no indication in the draft plan that Transit NZ is even thinking about the issue of severance for local communities. The number of large-scale roundabouts included in the general activity list is an indication of how low this issue is in Transit's considerations.
• Promoting multi modal integrated planning to reduce the need for roads.	Admirable. Show us the money! Which roads are we NOT building because of this approach?

The Plan continues (page 12):

Extract from 10-Year Plan	CAN Comments
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Across the 2005/06 SH Plan we have tried to ensure that there will be reasonably even progress towards the stated goals for each of the LTMA objectives.	Excellent
What is clear is that:	
<ul style="list-style-type: none"> <li>a greater focus needs to be put on areas of travel demand management (eg ramp metering), priority for passenger transport (eg bus priority lanes and priority signals), and better managing the existing transport network to sustain traffic capacity. Extra travel demand management activities have been incorporated in the 2005/06 SHP;</li> </ul>	Please describe and quantify.
<ul style="list-style-type: none"> <li>more staff resources are required (through professional services (maintenance) and Transit's administration budget) to work with local authorities and developers to ensure that the capacity of the existing state highway network is not degraded by inappropriate land use development and that the demand is sensibly managed with priority for freight movement, passenger transport and long distance trips where there is conflict;</li> </ul>	Is this included in the Plan? If so, please describe and quantify. We would support a major increase in Transit NZ's time and money being devoted to these activities, since they are likely to make a fundamental difference to the type and number of facilities required by road users.
<ul style="list-style-type: none"> <li>future proofing all new infrastructure, and where possible the relevant existing, state highway transport infrastructure to accommodate advanced traffic management systems and possible network pricing systems;</li> </ul>	Admirable. Is Transit committing to this principle? What is the plan for implementation of at least demonstration programmes?
<ul style="list-style-type: none"> <li>all large activities, and many of the smaller activities, are designed to be multi-modal facilities catering for cars, trucks, buses, cyclists, pedestrians and/or rail all within the one corridor.</li> </ul>	We would like to see an independent audit process established to ensure this occurs. In our experience (at the level of local consultation) the needs and aspirations of non-motorised road users are considered after the shape of (or need for) the project has been determined.
Examples of the synergy that is happening are SH20, Mt Roskill (Auckland) and SH20, Manukau Extension (Auckland); and	Ditto.
<ul style="list-style-type: none"> <li>attention needs to be given to funding to ensure adverse environmental pollutants from the transport system are reduced to a sustainable level.</li> </ul>	Is this included in the Plan? If so, please describe and quantify.

Accordingly, we would like to see an independent audit of the entire programme against Land Transport NZ's criteria:

- assisting economic development,
- assisting safety and personal security,
- improving access and mobility,
- protecting and promoting public health, and
- ensuring environmental sustainability.

#### 4. Draft 2005/06 Walking and Cycling Plan (Attachment K)

The following are specific comments about the walking and cycling projects listed in the draft plan, in the hope that these can be addressed in preparation of the final Plan:

- The project name for most of the projects gives insufficient information about the projects.
- We would like to see better evidence to justify the stated BCRs and costs given. Our concern is that, because Transit does not have to co-fund transport projects in the way that other RCAs do, there is little incentive to minimise costs (freeing up more funds for other projects nationwide), nor to adequately evaluate their project proposals and produce robust BCRs.
- We would like to see improved presentation of the walking and cycling projects in the final plan, with regional summaries shown and an indication of the timing of each of the works. While the Introduction document identifies Appendix K as a three year programme, this is not apparent from the document itself.

We recommend that Transit NZ commissions specialist cycling audits of its network, to identify key impediments,

pinch-points, and other concerns for cyclists. We are pleased to note in the general projects that there are a number of narrow bridges being widened or replaced, and some areas where seal widening is proposed. We submitted a list of priority bridges that needed treating some years ago, and we trust that that list is being used to help identify areas for treatment. It is also pleasing to note that these projects are quite rightly listed as general roading improvements, not cycling or walking projects.

Following on from an audit, funding should be allocated to address any minor problems identified (or maintenance funding used); often it is a number of minor things that make the difference for cyclists, or that discourage non-cyclists from becoming cyclists, for at least some of their journeys. More significant issues can then be properly investigated and works subsequently programmed. In this way, provision for cyclists on SHs around the country will be more consistent and not driven only by the relative availability and enthusiasm of local cycling advocates and Transit cycling champions.

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<p>The Cycling Advocates' Network of NZ (CAN) Inc is this country's national network of cycling advocate groups. It is a voice for all cyclists – recreational, commuter and touring. We work with central government and local authorities, on behalf of cyclists, for a better cycling environment. We have affiliated groups and individual members throughout the country, and links with overseas cycling organisations. In addition, many national, regional and local government authorities, transportation consultancies, and cycle industry businesses are supporting organisations.</p>
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