



15 September 2023

Re: Draft Government Policy Statement on Land Transport 2024 (GPS 2024)

Attn: Te Manatū Waka (Ministry of Transport)

Tēnā koe,

Thank you for the opportunity to submit on the Draft Policy Statement on Land Transport 2024. We recommend that a number of alterations be made to this in order to take into account accelerating climate change and to optimise health and equity benefits.

Overall Context

OraTaiao's response must be read in this overall context (below) which we believe must shape the **Government Policy Statement on Land Transport 2024**:

Firstly, Aotearoa New Zealand simply cannot afford a destabilising global climate – and certainly not triggering tipping points that take global overheating out of any capacity for humans to manage and adapt. The world is too close to the edge - this is a global climate crisis. New Zealand depends on a stable climate and ocean conditions for our exports - and on stable world markets to buy our products and deliver our essential imports.

As New Zealanders can see from Cyclone Gabrielle and the Tāmaki Makaurau Auckland floods, **the costs of global overheating far outweigh the costs of cutting emissions** - as world-leading economists have clearly demonstrated previously. New Zealand needs the world to work together to rapidly reduce our climate risk - and stepping up to contribute fairly to the global effort is New Zealand's best chance of securing our future. We can all see the unravelling. The time to step up is now – to create hope, and protect the social contract between generations beyond 2030.

Secondly, the global climate action context is critical for the GPS 2024 which spans a decade, including the critical next three years. The GPS2024 sits within the context of the **highly dynamic climate crisis and must be both sufficiently ambitious and able to be rapidly adjusted**.

In summary, NZ's current commitment to cut gross domestic emissions is a mere fraction of what's needed from us, pressure to cut all gases much faster is highly likely, and NZ simply can't afford to shield any sector from reality. The easiest path for the transport sector is for GPS2024 to rapidly eliminate climate pollution and ensure the infrastructure needed for net zero much closer to 2030 than 2050, with negative emissions soon after.

- NZ's legislative targets, future emissions budgets and second emissions reduction plan, are all under review currently by the NZ's Climate Change Commission.
- Furthermore, there is a Global Stocktake of global efforts to date due this year, NZ is expected to submit a more ambitious NDC in 2025 beyond 2030, and the IPCC in its March 2023 Synthesis of the sixth Assessment Report call for 'rapid, deep and mostly immediate cuts' to climate pollution in all sectors this decade - to have half a chance of limiting global overheating to 1.5 degrees, and two-thirds chance for 2 degrees. Every tenth of a degree matters.
- The world's expert climate scientists state in their 2023 Synthesis report that there's a rapidly closing window of opportunity to secure a liveable and sustainable future for all. This is the less visible rising climate 'cost of living' for New Zealanders.
- Big climate polluters delaying action are piling up a huge bill in offshore credits for our government to pay in 2030. The Treasury estimates a bill ranging from \$4 billion to \$24 billion in 2030. Logically, New Zealand must hope for the highest bill of \$24 billion or more - because this means that by 2030 that the cheapest emissions reduction options have been taken as the world moves swiftly to reduce climate risks.
- The transport sector is responsible for a substantial amount of this 2030 bill. That's additional to the financial support increasingly needed by the sector for more frequent and damaging extreme weather events.
- As NZ's biggest climate health NGO with over a thousand health professional members, OraTaiao is very aware of how stretched our health service is, and the opportunity cost of government funding \$24 billion in offshore credits.
- Extensive evidence, both within NZ and internationally, conclusively demonstrates that investing in well-designed climate action that promotes health, pays a double dividend of both health gains and avoided health harms from climate changes. This also drops demand on our overstretched health sector.
- Insurance bills, repair costs and food prices (from crop losses and road washouts) are all going up. It's time for direct government support so low-income households fairly transition and adapt - not perpetuating high emissions transport and paying other nations to make up for our inaction.
- OraTaiao also contends that there is a strong international equity case for NZ reducing our domestic gross emissions at a much faster rate. NZ has signed up to halving our net climate pollution by 2030, which is an 'average' effort. Yet NZ is relatively wealthy, has polluted the most (per person) since 1850 (cumulative per capita emissions 1850-2021) through land use change and destruction of native ecosystems, and we still pollute per person much more than the global average. For global fairness, NZ must move to cut our gross domestic emissions much faster, moving to neutral then negative emissions much closer to 2030 than 2050 (Metcalf 2015, Civil Society Equity Review Coalition, Background to the NZCPHM's stance on setting national GHG emissions targets).
- The NZ ETS, as the government's number one climate tool, is not even delivering on NZ's very weak promise to effectively cut gross domestic emissions by around 7% (a small fraction of our fair effort). NZ is an outlier in depending on offshore credits to meet two-thirds of our promised NDC emissions reductions by 2030 (with the highest offshore credits ratio in OECD). This puts more pressure on GPS2024 to deliver fast large-scale emission cuts and future-proof our transport infrastructure.

- The NZ government must use every tool across all gases and all sectors now to drive the speed and size of emissions reductions needed within Aotearoa to contribute enough to limiting global overheating within 1.5 degrees. Transport is a critical sector in this sprint.
- This global climate crisis demands a sprint and a marathon. The sprint needed right now to limit global overheating to 1.5 degrees (and every tenth of a degree overshoot counts). The marathon means continuing to cut emissions across production and consumption, so that within a couple of decades more greenhouse gases are being removed from the thick blanket of carbon pollution overheating our world than emitted. This means negative emissions. The sooner emissions rapidly drop within the transport sector - the better our chances of thriving and surviving. Expecting everyone else to cut emissions means the transport sector is even less prepared for the demanding years and decades ahead.

NZ has to step up massively to play our part as a global citizen. Every tenth of a degree matters, and there'll be many more important calls on government funds, globally and domestically. GPS2024 must play a strong part in rapidly cutting NZ's transport emissions, ensuring equitable access, maximising health gains, climate resilience and best-practice infrastructure for our emissions-constrained future. Government spending must be optimised and wisely allocated.

GPS2024 Strategic Priorities

'Rapidly reducing emissions' must be the overarching focus and top strategic priority for GPS2024, and quantified to drive NZ's transport sector to net zero before the GPS2024 decade ends, mostly from gross emission cuts. As outlined above, we face a highly dynamic climate crisis, where NZ must scale up the speed and size of gross emissions cuts to contribute to the global effort to keep global overheating within 1.5 degrees, where every tenth of a degree beyond that matters.

This means a major shift in funding across activity classes and years, to **frontload funding into public transport, walking and cycling modes**. As there is currently an increasing risk of CERF funding being used for non-climate purposes, ensuring sufficient funding for this major shift is essential.

OraTaiao strongly agrees with the [Ministry's Indicative Strategic Priorities Engagement Paper's](#) recommendation (released earlier this year) that emissions reductions are the overarching focus for GPS2024. To do otherwise ignores the realities of the deeply carbon-constrained world we now live in.

Specifically: 'makes the contribution necessary to easily reach the 2035 transport emissions reduction targets (including capacity to reach scaled-up targets).' must replace the current wording: 'makes an appropriate contribution to the 2035 transport emissions reduction targets, within the available NLTF funding, the NLTP's scope of influence, the expectations set out in Section 4 of this GPS, and other interventions to reduce emissions including land transport investment outside of the NLT.' (p.24 GPS2024)

Specifically: 'For the avoidance of doubt, the GPS does not expect that every individual investment within the NLTP must reduce emissions, but no investment within the NLTP may increase emissions.' must replace the current wording: 'For the avoidance of doubt, the GPS does not expect that every individual investment within the NLTP must reduce emissions.' (p.24 GPS2024)

The **second strategic priority is ensuring 'resilience'** for a world overheated by 1.5 – 2 degrees Celsius. Beyond that is 'game over' – so the first focus for resilience is doing everything to ensure NZ doesn't face that scenario. In other words, risk reduction by rapidly reducing transport emissions. Resilience must be fairly distributed amongst communities, especially acknowledging climate changes as yet another symptom of colonisation and extractivism.

The resilience of our health sector is inextricably connected with the resilience of our transport sector – in both dropping health demand and ensuring access to health services as extreme weather events intensify. And at the same time, rapidly cutting emissions.

Resilience also includes energy independence - radically cutting our fossil fuel dependence is a win-win-win-win for climate stabilisation, offshore credits costs avoided, cleaner air for human health, cutting import costs driving high emissions exports, and resilience as supplies become less certain for NZ as a small market tucked faraway in the Pacific.

Our transport system must be fit for at least the next couple of decades - including increasingly hot temperatures and stronger winds. For example, designing walkways and cycleways to protect people from heat exhaustion, as well as increasing the durability of construction materials throughout the transport system.

The **third strategic priority is 'health and safety'** as the transport sector has a big influence on the health of New Zealanders from the obvious tip of the iceberg of road crashes killing hundreds of New Zealanders yearly, and permanently harming many thousands, to the less obvious, but even larger health harms of air pollution-related illness and premature death (over 2,200 premature deaths per year due to air pollution from motor vehicles in 2016), and enforced physical inactivity due to a transport system that prioritises sedentary transport (a decade ago estimated at almost 1% of GDP).

It's time to deliberately design transport to maximise human health, not harm. Enabling public transport, walking and cycling has been shown to disproportionately benefit the wellbeing of children, elderly, Māori, disabled people, and families with low incomes.

Internationally, Hamilton et al have demonstrated that investing in health-centred climate action (including transport) effectively pays a double dividend of health savings and avoided climate harm. This ground-breaking climate health research examined nine diverse nations with half the world's population and responsible for three-quarters of the world's emissions.

The other three GPS2024 GPS priorities must be considered in the context of a rapidly changing world. The GPS2024 context (as outlined earlier) is not business-as-usual. Sustainable urban and regional development, integrated freight system, and system maintenance and operation, must all be considered in the context of increasingly constrained capacity to emit. For example, the focus on consumption emissions is increasing – so the volume of freight should reduce substantially, including imported goods. The Ministry must plan for sharply decreased demand as access to work, study, play, goods and services, becomes increasingly virtual and localised.

Ensuring Tiriti o Waitangi, justice, inclusive and equitable access are cross-cutting themes across all six strategic priorities. Working in real well-resourced partnership at all levels is essential.

The strategic priorities must deliver best-practice transport infrastructure for our emissions-constrained future. This means retaining the 2021 GPS objective to ‘Transform to a low-carbon transport system...’ not weakening to ‘Transitioning to a lower-carbon transport system’ in GPS2024.

GPS 2024 Land Transport Investment

OraTaiao strongly disagrees with the funding allocations for the different activity classes across 2024/25-2026/27 and 2027/28-2023/34 (Table 7: Total land transport investment, p51 GPS2024).

As stated above, ‘rapidly reducing emissions’ which OraTaiao expects must be the top strategic priority in GPS2024, means a major shift in funding across activity classes and years, to frontload funding into public transport, cycling and walking activity classes. NZ’s transport sector must reach net zero before the GPS2024 decade ends - mostly from gross emission cuts.

The three public transport activity classes (services, infrastructure and inter-regional) must get as much funding as can be used each year to maximise the rapidly expanded role of public transport, especially in urban areas. Infrastructure has a lead time, so this extra funding may span many years.

The frontloading of the walking and cycling activity classes by contrast must apply from the next financial year 2024/25 to maximise safe attractive ‘all age, all ability’ walking and cycling networks throughout all urban areas. The earlier transport emissions are avoided, the stronger the climate risk reduction, and the sooner the health gains - a win-win. Walking and cycling infrastructure is relatively fast and cheap to construct, and unlike roads, requires minimal maintenance costs once established.

The business-as-usual of maintaining and constructing roadways must be scaled sharply back, to release the funding needed to optimise public transport, walking and cycling infrastructure in all urban areas. The construction workforce must be mobilised to complete this infrastructure as soon as physically possible - slowing roading construction and maintenance.

NZ faces a climate crisis - fast emissions reduction is our overarching GPS2024 focus. Walking, cycling and public transport must become our dominant modes of transport in all urban areas from small towns to big cities, with residual private vehicle ownership almost all electric within years, not decades. Residual private vehicle use and freight shifts to predominantly rail will also reduce the demand for both road construction and maintenance.

Accelerating this infrastructure must be supported by a similarly rapid expansion of car share as shared/public transport (cars for hourly hire). Car share both enables and amplifies the climate and health gains from increased walking, cycling and public transport. Each car share vehicle takes around ten privately owned (mostly unused) cars off our roads, roadsides and garages. This enables a much more cost-effective use of land for walking, cycling and public transport, and for housing. Car share can also reduce transport costs for many households, and increase transport equity.

GPS2024 Activity Classes

OraTaiao strongly opposes the Road to Zero activity class being dismantled and incorporated into the State Highway and Local Road improvement programmes. Our members witness the terrible consequences of road crashes in our day-to-day jobs. We strongly support Vision Zero and the need to have a safe transport system to support and enable genuine travel choice and inclusivity for everyone to meet their needs and thrive in an increasingly carbon-constrained world.

OraTaiao urges the creation of separate classes of activity for 'Walking' (including low-speed mobility devices on footpaths by people living with physical disabilities) and for 'Cycling' (which includes e-scooters and other micro-mobility modes) pp. 46 and 62 GPS2024. This separation means replacing the term 'active modes' everywhere in GPS2024 with 'walking and cycling'. Walking and cycling differ considerably and substantially gain from a separate focus on encouraging each mode. OraTaiao supports creating the new 'Inter-regional public transport' class (p.46 GPS2024).

OraTaiao recommends that 'car share' (cars for hourly hire) be explicitly included in the Public Transport Services activity class. Car share both enables and amplifies the climate and health gains from increased walking, cycling and public transport. Each car share vehicle takes around ten privately owned (mostly unused) cars off our roads, roadsides and garages. This enables a much more cost-effective use of land for walking, cycling and public transport, and for housing. Car share can also reduce transport costs for many households, and increase transport equity and access (Appendix 1, p.64 GPS2024).

Other specific feedback

OraTaiao strongly supports the 'build back better' emphasis - and applying this in a very broad sense to equitable low-emissions access, so that roads may not be replaced in some areas prone to extreme weather event damage and/or rising sea levels. Or roads may be planned and constructed quite differently to embed both resilience and lower emissions access. Every time a replacement situation arises, this must be claimed as a chance for much better walking and cycling infrastructure, plus public transport. This is the chance to accelerate the necessary shift from predominantly privately-owned vehicle transport, to shared transport, walking and cycling. (p.58 GPS2024)

OraTaiao requests that evaluation of progress includes fully evaluating both the physical and mental health and wellbeing co-benefits of walking and cycling projects, plans, actions and priorities, and the disbenefits of car-oriented projects, plans, actions and priorities. (p.35 GPS2024) There is a substantial collection of evidence available, so there is no justification for partial cost-benefit analyses that omit health, the whole population, and future generations. NZ can't afford government agencies to act as silos - we urge a 'health-in-all-policies'¹ and a 'children-in-all-policies'² approach.

Within prioritising public transport, include prioritising the quality of the 'first and last kilometre' walking and cycling journeys to and from public transport, to reflect the mixed mode reality of the entire trip. This full integration also means stating 'using public transport, walking and cycling', instead of 'using public transport or active modes' (p.24 GPS2024).

¹ <https://www.who.int/activities/promoting-health-in-all-policies-and-intersectoral-action-capacities>

² <https://cap-2030.org/>

Further Information

Further information can be found in OraTaiao's active transportation position statement³, recent E-scooter⁴ and Reshaping Streets⁵ submissions, our submission on the Future of NZ's Mobility Inquiry⁶ in 2016 and our previous submission on the Draft Policy Statement on Land Transport for 2015-2024⁷.

OraTaiao welcomes discussion and questions at any time on the content of our submissions. Thank you for this opportunity to give feedback on GPS2024.



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About OraTaiao

OraTaiao: The New Zealand Climate and Health Council is an internationally-linked NGO of over a thousand health professionals calling for rapid, fair, and Tiriti-based climate action in Aotearoa. We recognise the important co-benefits to health, well-being and fairness from strong and well-designed policies to rapidly reduce climate risk. Our vision is Āhuarangi Ora, Tangata Ora, 'Healthy Climate, Healthy People'.

www.orataiao.org.nz

³ https://www.orataiao.org.nz/orataiao_active_transportation_policy_statement

⁴ https://www.orataiao.org.nz/e_scooters_don_t_belong_on_footpaths_submission_to_waka_kotahi

⁵ https://www.orataiao.org.nz/orataiao_supports_reshaping_streets_regulatory_changes

⁶ https://www.orataiao.org.nz/orataiao_submission_to_transport_and_industrial_relations_committee_inquiry_into_the_future_of_nzs_mobility

⁷ https://www.orataiao.org.nz/submission_to_the_ministry_of_transport_on_the_draft_government_policy_statement_on_land_transport