



02/04/2024

Attn: Te Manatū Waka Ministry of Transport

Re: Government Policy Statement on land transport (2024-2034)

Tēnā koe,

Thank you for the opportunity to comment on the draft Government Policy Statement on land transport (2024-2034). OraTaiao considers this draft GPS to be a highly retrograde plan which would worsen transport choice, embed negative health outcomes and fail to reduce transport-related climate emissions at a rate needed under our legislated goals as outlined in the Zero Carbon Act and our international commitments under the Paris Agreement. It ignores the health outcomes of transport investment and the fact that a resilient transport system is one with choice and options.. It will fail to achieve its stated aim of delivering “better outcomes for present and future generations of New Zealand.”

Investment in transport infrastructure cannot be separated from the impacts it has in individual and public health, city design and livability, climate emissions and congestion. The best current evidence has shown that the annual cost of health impacts from transport-derived air pollution and trauma alone is well over \$12 billion (with further additional costs from enforced physical inactivity, traffic congestion, noise pollution and neighbourhood severance). Transport accounts for nearly 20% of the country’s climate emissions. The cost-benefit ratio for major road-building projects in New Zealand is consistently under 1, even when based on unrealistic time-saving from congestion improvements that rarely eventuate (road-building being a major contributor to congestion within the network) and outdated underestimations of the negative health impacts.

The following are the main areas of concern with the GPS:

- A focus on moving cars rather than people with an egregious defunding and deprioritising of active and public transport projects.
- Deprioritising of existing considerations for climate impacts in transport projects.
- A reduction in the focus on health impacts to trauma-related consequences alone.
- A complete disregard for the South Island with respect to public or active transport development.

- A worsening of the road maintenance burden (despite road maintenance being supposedly a priority) by increasing road traffic, and reducing the availability and choice for other modes particularly for freight transport.

- A narrow definition of resilience as “resilience of one mode.”

- No proper consideration for equity in transport. Many adults cannot drive due to existing medical conditions and disabilities, or because of upfront costs, and there is no consideration within the plan for independent mobility of the entire population under the age of 16.

The GPS is a throwback to a mid-20th century mentality in which the car is king and other modes are neglected to the point of death. It represents an absolute failure from the government to protect New Zealanders’ futures. It prioritises cars over people and speed over safety and its results will be counted in the avoidable road-deaths and illnesses due to air pollution, in the worsening congestion from inappropriate road building, in the urban sprawl encouraged, in the lack of choice for people who cannot drive and in the inevitable collision between a high-carbon transport system and our international obligations to reduce climate emissions. In short, from a health, equity and climate perspective, it is an utter disaster which represents an assault on the health and wellbeing of the people of New Zealand.



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#### **About OraTaiao:**

OraTaiao: The New Zealand Climate and Health Council is an organisation calling for urgent, 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 mitigative policies. Our vision is Āhuarangi Ora, Tangata Ora, ‘Healthy Climate, Healthy People’