

**Greater Wellington Regional Council draft
submission to the Ministry of Transport on the
Discussion Paper:**

***Sustainable Transport – Update of the
New Zealand Transport Strategy***

February 2008

Draft

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1. Introduction

- 1.1 Greater Wellington Regional Council (Greater Wellington) thanks the Ministry of Transport (MoT) for providing the opportunity to make a submission on the proposed Update of the New Zealand Transport Strategy (UNZTS) discussion document.
- 1.2 Greater Wellington acknowledges that this is a discussion document and is framed to provide more background detail and rationale than might be presented in the final UNZTS. However, as this is likely to be our one opportunity to comment on the proposed update, there are a number of both high level and detailed elements of the document that we are concerned about and that we believe require amendment or further clarification prior to the UNZTS being released.

The submission is set out in five main sections:

- Section 2 provides general comments on the document and Next Steps review;
- Section 3 outlines specific commentary on discussion points raised by the document;
- Section 4 discusses commentary on the proposed targets;
- Section 5 provides information on the implications of the discussion document for Regional Councils; and
- Section 6 sets out concluding comments.

2. General Comment

2.1 Context and statutory weight of the document

- 2.1.1 Greater Wellington is particularly concerned about how the discussion document's targets have been set and whether they are the most appropriate and cost effective solution for the issues. We understand that there is not robust analysis that shows how the targets achieve the overall aim of an affordable, integrated, safe, responsive and sustainable transport system. While each target on its own appears to be laudable, without appropriate analysis, including an assessment of alternatives, we do not have confidence that the targets will be affordable and will result in the positive outcomes the government is seeking.
- 2.1.2 Some of the targets (e.g. the rail freight target) will require significant investment and will influence funding decisions in the short and medium terms if they are to be achieved. Given funding constraints and spending trade-offs that exist in the transport sector we need to have confidence that the targets are appropriate and achievable, and the Government is committed to them. If the analysis is carried out after the targets are set and the targets are found to be either flawed or that alternatives are found to be more appropriate, then we are concerned that both time and financial resources will be wasted in the interim.

- 2.1.3 In addition, we believe that the targets set through the UNZTS should be high-level targets and that regional land transport strategies should be the vehicles for translating those targets into relevant regional or local targets and actions. In this way local communities will be involved with decisions affecting projects and actions that have local funding implications. In this regard it is very important that the process for confirming both national and regional targets reflect a partnership between the two levels of government. We request that detailed and robust analysis of the proposed targets be undertaken prior to finalising the targets, and that this work is done in collaboration with local government.
- 2.1.4 The discussion document does not make it clear as to what the relationship is between the discussion document and the Government Policy Statement (GPS), UNZTS, “trend, issues and options paper” or the recently released “MoT draft Public Transport Objectives” discussion paper. With such a vast array of documents being released or currently under development by MoT, it would be very useful for those who have to implement it to have some clarity about how they will all fit together.
- 2.1.5 Greater Wellington notes that under current Land Transport Act 1998 legislation and under the Land Transport Management Amendment Bill (on which Greater Wellington has previously submitted) the NZTS (or UNZTS) has no statutory weight. This means that implementing agencies in New Zealand such as Greater Wellington, Road Controlling Authorities, Land Transport NZ, ONTRACK, etc have no legal requirement to take into account its policies or targets.
- 2.1.6 Greater Wellington seeks clarification as to how the NZTS or UNZTS relates to a National Land Transport Strategy, as set out in the Land Transport Management Act, and suggest that the government should in fact be developing a National Land Transport Strategy from this discussion document. Including the proposed targets as part of a National Land Transport Strategy would mean that the relevant transport agencies would be required by the Land Transport Act to develop their strategies consistent with achieving these targets.

2.2 Affordability

- 2.2.1 Whilst Greater Wellington welcomes high level targets being developed across all five of the NZTS objectives, we note that the discussion document acknowledges that achieving some of the targets set in the document will require “major investment”. Inadequate funding for infrastructural improvements and public transport services are barriers to providing good access and mobility in many, if not all regions.
- 2.2.2 It must also be remembered that at the end of the day, someone has to pay to achieve the proposed targets, whether it be users, ratepayers or taxpayers; and in many cases that is the same person. While rate payer affordability issues are dealt with in further detail in section 5, below, we also note that the prioritisation of Regional Land Transport Programmes will be very important in helping regions decide relative priorities for their regions.

2.3 New Zealand Transport Strategy Objectives

- 2.3.1 It is unclear whether the new commentary that appears under each of the NZTS objectives throughout the discussion document will go into the final update of the NZTS. If this is the case, then Greater Wellington believes that this would be a good place for discussion on the merits of weighting each the NZTS objectives in order to provide clarity about the government's priority for each of the objectives.
- 2.3.2 Greater Wellington seeks clarity around the relative importance of each of the five objectives of the NZTS (given statutory weight through the Land Transport Management Act). Whilst in an ideal world it would be preferable to be able to develop and implement policy, programmes and projects/activities that contribute in an equally positive way to all of the objectives, experience over the last five years since the Land Transport Management Act was introduced has shown that agencies that are charged with this role have great difficulty in doing so due to affordability issues.
- 2.3.3 It has been signalled that some direction will be provided regarding relative priority of the objectives through the setting of Financial Assistance Rates in the GPS. However, Greater Wellington believes that this will only provide guidance from a funding perspective rather than a strategic transport planning perspective. Greater Wellington considers that it would be more appropriate to "prioritise" the NZTS objectives to clearly signal central government's expectation for the transport sector.
- 2.3.4 From a strategic transport perspective, we believe the paramount objectives of the NZTS to be 'improving access and mobility' and 'assisting economic development' but that in implementing these two objectives we must take account of the need to support public health and safety objectives and to minimise impacts on the environment.

3. Specific Comments

3.1 Vision for the future (page 11)

- 3.1.1 Greater Wellington largely supports the vision for New Zealand's transport system in 2040 set out in the Discussion Document. We welcome the specific direction provided in relation to moving people and moving freight from a national and local perspective, noting that the Transmission Gully Motorway is an excellent example of a project that not only facilitates national movement of people and freight, but also increases capacity whilst providing an alternative strategic route into and out of the greater Wellington region. However, we believe that the vision could be strengthened in the following ways:
- 3.1.2 Aside from CO2 there is not a strong link between the vision and the targets of the discussion document. The document would benefit from a clear and easy to understand table that links the vision and all of the targets in a similar way to the NZTS objective/discussion documents target linkage table (page 19 of the discussion document).
- 3.1.3 We do not support the vision statement related to improved public transport frequency. Experience has shown that increasing public transport frequencies across the board does not necessarily lead to a higher quality service, especially given the very significant costs

involved. Rather, we would support a vision statement in this area that related to a more efficient public transport service. For example the vision statement associated with public transport could be More people use public transport.

- 3.1.4 We find the vision statement that “road users pay full costs” to be confusing. At the moment all State Highway works are fully funded via road user taxes while local roading draws on a general rating component. We seek clarification as to whether the statement in the discussion document therefore means that the government is suggesting that a local rate component will no longer be required to help pay for local roading?
- 3.1.5 Finally, we wish to note that in regards to social subsidies continuing to be paid for the elderly and transport disadvantaged, that Greater Wellington’s view is that while we recognise the significant social benefit that comes from such subsidies, the cost should not be met by road users or ratepayers.

3.2 Proposed Guiding Concepts for New Zealand Transport (page 21)

- 3.2.1 While we agree with the concepts, we are unsure as to where they fit in a high level strategy such as the NZTS. They may be more appropriate as the objectives in any future National Land Transport Strategy.

3.3 Transport Choices (page 57)

- 3.3.1 We agree that this section of the discussion document identifies some of the key transport choices, but note that future choices about transport are likely to be wide ranging and complex. In addition, we suggest there are important choices about where investment and resources are directed.
- 3.3.2 Greater Wellington agrees that transport problems cannot always be solved with transport solutions alone. We see the relationship between transport planning and land use planning as vital to improving travel choices and reducing the need to travel. In particular, we believe that land use development that provides intensification along public transport corridors, transit oriented development, local facilities and job opportunities are good examples of “non transport” solutions that can assist with solving transport problems.
- 3.3.3 We believe initiatives to influence travel behaviour change are important for the travel choices that will be made in the future, particularly if we can influence young people through school travel plan programmes. It is also important to recognise the wider benefits of travel choices (which we take to mean alternatives to private car use). For example, the impact of increased use of active modes and public transport on people’s health which can result in healthier communities and in turn can lead to less pressure being placed on the health system.

4. Comment on Transport Targets (pages 16 - 52)

4.1 General Comment

- 4.1.1 As noted in the introduction to this submission, Greater Wellington welcomes targets being developed across all of the NZTS objectives. However, we have a number of comments and suggested amendments which are set out in the table below.
- 4.1.2 In addition, the way targets are currently presented in the discussion document is confusing and we would like to see their structure simplified. This could be achieved by merging the targets to ‘reduce harmful emissions from cars and trucks’ into the other targets.
- 4.1.3 A further layer of ‘supporting targets’ are identified under each objective area and we consider that these are in fact ‘actions’ or ‘initiatives’. The ‘supporting targets’ form a partial implementation plan which won’t go far enough to show how targets are to be met. We therefore support the insertion of a full implementation plan (developed in collaboration with implementation agencies) to make it clear how the government proposes we will achieve the proposed targets.
- 4.1.4 We note that those targets identified as ‘proposed intermediate or detailed targets for 2040’ include a mixture of shorter timeframes (eg. by 2015), longer timeframes by 2040 and in some cases no timeframe is stated. We believe timeframes for all targets should be clear, easily identified and consistent.
- 4.1.5 Many of the targets are ambitious and in order to achieve the type of “step change” necessary to achieve them we believe that the early introduction of legislation to enable effective road pricing schemes will be key. The UNZTS discussion document mentions a need for pricing but we believe it should go further to include specific steps to introduce road pricing in NZ at an early date.
- 4.1.6 We also seek clarification about the expected role of regional and local authorities in contributing to and monitoring the proposed targets. We note that some targets cover detailed matters which we believe should be set by regions through their RLTS. If regional targets are to be set at the national level we query where regional planning fits and believe that there must be a component of “bottom up” planning contributions from local government as well as the proposed “top down” planning from Central Government.
- 4.1.7 We seek the opportunity to be involved in developing or at the least make comment on any target or action that will be implemented by local government or have local funding share implications at a regional and/or local level such as regional passenger transport and active mode share targets.

4.2 Detailed Comment

1.	Government agreed high-level outcome target for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
1.1	Halve per capita domestic greenhouse gas transport emissions (relative to 2007).	Transport generated CO ₂ emissions remain will remain below 1,065 kilotonnes per annum (2001 levels).	<p>We note that this government target has already been set.</p> <p>Based on Statistics NZ medium projections of 0.83% per annum over 33 years the projected growth in population by 2040 would be 31% of current population. Halving per capita transport emissions with this population growth would result in a 34% reduction in total emissions from 2007 levels – which would be equivalent to 1990 levels. Emissions equivalent to 1990 levels would halve the forecast base case emissions for 2040.</p> <p>Greater Wellington recommends that it would be useful to have an absolute target for tonne CO₂ reduction for the transport sector. This would signal government's commitment to reducing greenhouse gases from transport activity regardless of the rate of population growth.</p>

2	Proposed high-level outcome targets for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
2.1	Travel times by all modes will be predictable.	<p>Average congestion on selected roads will remain below 20 seconds delay per kilometre travelled despite traffic growth.</p> <p>Key routes are very rarely affected by closure.</p> <p>Nearly all bus and train services run on time.</p>	<p>We support this high level target.</p> <p>While the Wellington RLTS does not currently have a specific target around predictability of road journeys, travel time data is collected by Transit NZ on the strategic road network and could be used to measure predictability.</p> <p>Also refer to comments about real time information systems in 4.2 below.</p>
2.2	Travel times by principal routes within and between major urban areas and key economic nodes (eg main seaports, airports and major industrial areas) to be improved relative to 2007 for identified critical intra and inter-regional connections, as determined with each region.	<p>Improved road journey times for freight traffic between key destinations.</p> <p>No decrease in average vehicle journey speeds shown in travel time surveys for selected key routes.</p> <p>Reduced passenger transport journey times compared to travel by private car.</p> <p>Maintained vehicle travel times between communities and</p>	<p>Greater Wellington recommends that this target be amended and clarified for the following reasons:</p> <ul style="list-style-type: none"> • Predictability of travel times is generally more important than improved or faster travel times (although we note that this is not always the case, as in some freight trips). • On some routes, it may not be desirable to reduce travel times as this may make passenger transport less

2	Proposed high-level outcome targets for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
		<p>regional destinations.</p> <p>The process for determining what is appropriate in terms of this issue is a matter for regions to decide through their Regional Land Transport Strategies.</p>	<p>attractive.</p>
2.3	<p>All individuals have access to the facilities and activities they need, such as work, education, medical care and shopping centres, to participate in society.</p>	<p>All large subdivisions and developments include appropriate provision for walking, cycling and public transport.</p> <p>80% of passenger transport services are guaranteed to be wheelchair accessible. (11.8% in 2005/06)</p> <p>Most of the region's residents live within 400 metres (5 minutes walk) of a bus stop or train station with a service frequency of at least 30 minutes.</p> <p>Passenger transport services in the highest deprivation areas are more affordable.</p>	<p>We support this high level target, but would like to see the word '<i>transport</i>' added in front of <i>access</i>. This is to clarify that "access" includes many other factors related to architectural design and other issues, whereas this target relates to people being able to have a means of transport to get to the facility or service.</p>
2.4	<p>Public health effects of transport to be at accepted international standards.</p>	<p>The Wellington RLTS responds to the objective 'Protect and Promote Public Health' through a number of policies to address air quality and effects on communities such as severance and noise issues.</p>	<p>We support this target which is consistent with the Wellington RLTS.</p> <p>However, we note that further clarification about what is meant by 'accepted international standard' would be useful.</p>
2.5	<p>Local environmental impacts of transport (including air and water quality) to be at accepted international standard.</p>	<p>The Wellington RLTS responds to the objective 'Ensure Environmental Sustainability' through a number of targets relating to active and passenger transport mode share, CO₂ emissions, and reduced fuel use. The RLTS also includes policies to address alternative fuel options and vehicle efficiency, minimising non-renewable resource use, and other environmental matters.</p>	<p>We support addressing this issue which is consistent with the Wellington RLTS.</p> <p>However, we note that further clarification about what is meant by 'accepted international standard' would be useful.</p>
2.6	<p>Operate to world best-practice safety standards for all modes of transport.</p>	<p>No directly comparable target in the Wellington RLTS, but is consistent with many outcomes and policies that seek to improve safety for all modes.</p>	<p>We support addressing this issue which is consistent with the Wellington RLTS.</p> <p>However, we note that 'world best-practice' is setting the bar very high</p>

2	Proposed high-level outcome targets for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
			and we are concerned that this may raise affordability issues for New Zealand.

3	Government agreed intermediate or detailed targets for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
3.1	Become one of the first countries in the world to widely deploy electric vehicles (powered from renewable sources).	No comparable target in the current Wellington RLTS. However, we note that the region has made a significant commitment to electric trolley buses and electric passenger rail services.	We support this target which seeks to reduce the use of non-renewable fossil fuels in the NZ vehicle fleet. We note that central government will need to take a proactive lead in relation to issues such as: <ul style="list-style-type: none"> • Renewable electricity generation • Energy infrastructure • Incentives to uptake.
3.2	A biofuels sales obligation that will begin at a level of 0.53 percent from 2008, increasing to 3.4 percent of annual petrol and diesel sales by 2012.	No comparable target in the current Wellington RLTS.	We support this target which seeks to reduce the use of non-renewable fossil fuels in the NZ vehicle fleet. We note that central government will need to proactively lead these initiatives, particularly around manufacture and/or importation of vehicles and biofuels.
3.3	Reduce the kilometres travelled by single occupancy vehicles in major urban areas on weekdays by ten percent per capita by 2015 compared to 2007.	Private vehicles account for no more than 62% of region wide journey to work trips. (68% in 2006) Reduced vehicle kilometres travelled per GDP. Vehicles entering the Wellington CBD during the 2 hour AM peak contain on average at least 1.5 people per vehicle.	We support the intent of this target which is generally consistent with a number of RLTS targets and outcomes.

4	Proposed intermediate or detailed targets for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
4.1	Identify and remove any barriers to the uptake of plug-in hybrid and full electric vehicles that meet	No directly relevant targets in the Wellington RLTS.	We support addressing this issue, although we consider it to be a proposed action with an associated timeframe rather than a target.

4	Proposed intermediate or detailed targets for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
	appropriate safety standards.		
4.2	Effective real-time information systems in place to enable road users to plan their journeys to avoid congestion, minimising delay and fuel wastage, by 2015.	<p>No directly relevant targets in the Wellington RLTS.</p> <p>However, the Wellington RLTS identifies the implementation of traffic management tools, including real time traffic monitoring, to improve the efficiency of the existing strategic road network through its Regional Travel Demand Management Plan adopted in 2005.</p>	<p>Greater Wellington supports the intent of this target, but suggests that the target date could be brought forward given that the technology is readily available and systems have already been implemented in some parts of New Zealand.</p> <p>For example, Transit NZ has been progressively rolling out Advanced Traffic Management Systems (ATMS) and ramp signalling on Auckland's motorways for some years. In 2007, variable message signs (VMS) were installed at nine locations in the Wellington region to provide motorists with real time information about incidents, road conditions and alternative routes. Transit NZ's website also provides real time information on road conditions and includes information via a series of live web cameras across the Auckland motorway network.</p> <p>There are also many examples where comprehensive systems have been implemented overseas. A recent pilot was carried out by the Highways Agency on parts of the M42 in the United Kingdom which involved implementing an Active Traffic Management (ATM) system. Initial results showed a reduction in journey time variability, improved safety outcomes, better informed motorists, less disruption during incidents, and vehicle emissions reductions.</p> <p>Greater Wellington is also investigating implementation of real-time information systems for the region's public transport network and we would like to see a similar target in relation to passenger transport services.</p> <p>We recommend amending the target to refer to the State Highway network and key strategic routes, as these systems are primarily useful on routes that are affected by congestion or high traffic volumes.</p>
4.3	Road deaths no more than 200 per annum.	There are no road crash fatalities attributable to roading network deficiencies.	We accept that the proposed NZTS 2040 target is challenging and seeks to halve current annual road deaths.

4	Proposed intermediate or detailed targets for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
	[The 2007 national road toll was 423 road deaths. The Road Safety Strategy to 2010 has a target of 'No more than 300 deaths annually'].		<p>However, we suggest that for a long term target over 30 years away a 'zero vision' such as that adopted by countries such as Sweden (where any deaths are considered to be morally unacceptable) should be adopted.</p> <p>We suggest this is appropriate as a long term target given likely technology improvements and innovations to make our vehicles and road network safer in the future and the proposed targets around reduced private vehicle use.</p> <p>we recommend adopting a target of zero road deaths by 2040.</p> <p>We also recommend developing an interim target for 2020 as part of the review of the National Road Safety Strategy.</p>
4.4	Over 40 percent of the light vehicle fleet to have four star or better occupant protection (currently ten to 15 percent) by 2015 and 90 percent by 2040.	Not applicable at the regional level.	We support this target which seeks to improve road safety.
4.5	Over 25 percent of light vehicles to have electronic stability control (currently less than five percent) by 2015 and 95 percent by 2040.	Not applicable at the regional level.	We support this target which seeks to improve road safety.
4.6	Lift coastal shipping's share of inter-regional freight to around 30 percent (currently about 15 percent of tonne-kilometres).	No relevant target in the Wellington RLTS.	We support targets to address coastal shipping of freight and note that the Wellington RLTS and the Wellington Regional Strategy include targets and policies that seek improved access to key regional facilities including CentrePort which will support these targets.
4.7	Lift rail's share of domestic freight to around 25 percent (currently about 18 percent of tonne-kilometres).	All infrastructure constraints to rail freight movements are removed.	<p>We support this target which is consistent with the Wellington RLTS.</p> <p>However, we note that there is potential for conflict between rail freight and passenger rail services being run on the same line, particularly during peak times, and this needs to be managed and/or provided for.</p> <p>We also note that there are current difficulties in obtaining accurate mode share data for freight due to commercial sensitivity and lack of data available.</p>

4	Proposed intermediate or detailed targets for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
4.8	Increase the public transport mode share of peak hour travel (journeys to work) in Auckland, Wellington and Christchurch from an average of nine percent to 20 percent and work with each region to optimise peak hour travel targets.	Passenger transport accounts for at least 21% of all region wide journey to work trips (17% in 2006).	<p>We support the intent of this proposed target but believe that:</p> <ul style="list-style-type: none"> • Setting mode share targets over such a long timeframe is not particularly helpful. • It should be up to regions to determine through their RLTS's appropriate mode share targets. <p>Greater Wellington recommends removing this target or amend it to <i>'Increase the public transport mode share of journey to work in Auckland, Wellington and Christchurch'</i>.</p>
4.9	At least double the overall public transport mode share to seven percent of all passenger trips (currently about two to three percent).	<p>Passenger transport accounts for at least 25 million peak period trips per annum. (18.3 million in 2005/06)</p> <p>Passenger transport accounts for at least 25 million off peak period trips per annum. (16.7 million trips in 2005/06)</p> <p>(This means we are currently planning for a 70% increase in total trips made by passenger transport).</p>	<p>We consider that it is more appropriate for long term targets to focus on mode share for the peak period, together with targets around public transport accessibility (as suggested under 2.3).</p> <p>Outside peak times (with the possible exception of Auckland) roads have spare capacity. Seeking to double overall public transport mode share may involve running inefficient subsidised public transport services off peak and an underutilised road network at those times.</p> <p>Targets to address energy use, especially renewable energy use will mean that in the future that cars are likely to be as sustainable as public transport.</p> <p>We suggest this target be removed.</p>
4.10	Increase walking and cycling and other "active modes" to 30 percent of total trips in urban areas (currently about 17 percent).	Active modes account for at least 15% of region wide journey to work trips. (13% in 2006)	<p>Fully support a challenging target being sought for increasing walking and cycling trips. However we believe that the target should be pitched at a higher level with the actual percentage increase to be determined at the regional level.</p> <p>We note that achieving this target will require significant incentives for people to shift to these modes through continued behaviour change programmes and through improved funding for walking and cycling infrastructure to ensure these modes are safe and attractive to use.</p> <p>We have some concern about how this</p>

4	Proposed intermediate or detailed targets for 2040	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
			<p>target will be monitored. The terms 'urban and 'trips' would need to be defined. Also, while we believe that having detailed walking and cycling count data is very important, most Road Controlling Authorities do not collect it.</p> <p>We recommend amending the target to '<i>Significantly increase walking and cycling and other 'actives modes' trips in urban areas</i>'.</p>
4.11	Ensure a substantial reduction in premature deaths and serious illnesses arising from air pollution from motor vehicles.	No comparable target in the Wellington RLTS.	We support this target.
4.12	Manage noise to minimise any public health effects.	No comparable target in the Wellington RLTS.	<p>We support addressing this issue, but note that this is not a target.</p> <p>We suggest targets could be developed around maximum noise levels from vehicles and transport infrastructure.</p> <p>We note that noise issues associated with new infrastructure projects are normally dealt with during the Resource Management Act process.</p>
4.13	No net loss of indigenous vegetation or fauna from infrastructure construction or maintenance.	No comparable target in the Wellington RLTS.	We support this target but question if it is a significant issue that requires a specific target.

5	Government agreed targets to reduce harmful emissions from cars and trucks	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
5.1	Reduce the rated CO ₂ emissions per kilometre of combined average new and used vehicles entering the light vehicle fleet to 170 grams CO ₂ per kilometre by 2015 (currently around 220 grams CO ₂ per kilometre), with a corresponding reduction in average fuel used per kilometre.	No directly comparable target in the Wellington RLTS, however the strategy does have targets that address a reduction in overall fuel use (as set out earlier in this table).	We support this target and believe it is important for the fuel efficiency of the vehicle fleet to be addressed at the national level.
5.2	Ensure 80 percent of the	Target not applicable at the	We support this target and believe it is

5	Government agreed targets to reduce harmful emissions from cars and trucks	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
	vehicle fleet is capable of using at least a ten percent blend of bio-ethanol or bio-diesel, or is electric powered, by 2015.	regional level.	important for enabling the use of alternative fuels in the vehicle fleet to be addressed at the national level.

6	Proposed targets that will help further reduce harmful emissions from cars and trucks.	Relevant Wellington RLTS target(s) for 2016	Comments and recommended changes
6.1	Thirty-five percent of the vehicle fleet to have emissions technology consistent with Euro 4 (or equivalent) standard by 2015.	Target not applicable at the regional level.	We support this target as a national initiative which will complement initiatives made at the regional level to reduce harmful emissions.
6.2	Imported used petrol, LPG, CNG and diesel vehicles (light and heavy) are to be of Euro 4 (or equivalent) standard by 2012.	Target not applicable at the regional level.	We support this target as a national initiative which will complement initiatives made at the regional level to reduce harmful emissions.
6.3	Imported new petrol, LPG, CNG and diesel vehicles (light and heavy) are to be of Euro 4 (or equivalent) standard by 2009.	Target not applicable at the regional level.	We support this target as a national initiative which will complement initiatives made at the regional level to reduce harmful emissions.

7	Proposed Supporting Targets	Comments and recommended changes
7.1	<p><i>As noted in the general targets commentary section above, we believe that this section of targets are actions, not targets.</i></p> <p>Review Land Transport New Zealand's road programme by mid 2008 to ensure that transport network development is compatible with the UNZTS as part of the GPS development process.</p>	This initiative raises the issue of the role of regional programming and we would not support any target/action that would seek to change our role in this process.
7.2	Targets around serious injuries and social costs resulting from road crashes and for subsets of road traffic, such as targets for various road user groups and freight safety will be developed by mid 2009.	We support this initiative.
7.3	The Road Safety 2020 Strategy will be in place by 2010.	We support this initiative.
7.4	Targets for rail will focus on safety at level crossings and the level of trespassing on the rail network. This will also be	We support this initiative.

7	Proposed Supporting Targets <i>As noted in the general targets commentary section above, we believe that this section of targets are actions, not targets.</i>	Comments and recommended changes
	developed by mid 2009.	
7.5	Social cost targets for aviation safety to 2010 have been agreed and are regularly reported against. Each type of aircraft ³⁴ has its own target level expressed as social cost per seat hour of passenger exposure (see Appendix C). Targets to 2015 are expected to be developed by late 2009.	We support this initiative.
7.6	Targets for maritime safety to 2010 have been developed by Maritime New Zealand and look to reduce the number of fatalities, accidents and injuries per year for a range of vessels and for workplace activity (see Appendix C).	We support this initiative.
7.7	A vehicle fleet strategy discussion paper on the New Zealand vehicle fleet will be developed by the end of 2007 and a New Zealand vehicle fleet strategy by early 2008.	We support this initiative.
7.8	Review regional passenger transport mode share targets by 2012 through scheduled reviews of regional land transport strategies, and subsequent regional passenger transport plans.	We support this initiative although note that reviews are scheduled to take place before 2012.
7.9	Implement the initiatives outlined in the walking and cycling strategy's (Getting there – on foot, by cycle) implementation plan to a level that begins to achieve a shift to these modes by 2015.	We support this initiative.
7.10	Investigate the need to revise funding procedures for walking and cycling projects to ensure all costs and benefits of such projects are accounted for in their assessment by 2009.	We strongly support the review of Land Transport NZ funding procedures (particularly financial assistance rates) for passenger transport and active modes to ensure initiatives to improve these modes are given equal opportunities to access funding.
7.11	Provide advice on urban design (government will decide on the desirability of providing national guidance on urban design, as outlined in the NZEECS).	We are not convinced national guidance would be useful in this respect.
7.12	The Accessible Journey report contains recommendations on how to improve public transport accessibility and includes National Accessibility Design Performance Standards. These will be implemented progressively by 2025 to support our increased public transport patronage target.	We support the proposal to work towards implementing the recommendations of 'The Accessible Journey' report by 2025, but note that this will have significant ¹ cost implications and new Central Government funding must be made available if this target is to be achieved.
7.13	The National Environmental Standard on Air Quality includes ambient air quality standards that must be met by regional councils by 2013. These standards cover carbon monoxide,	We support this initiative.

¹ Investigations for the Regional Passenger Transport Plan found the cost to be around \$90 million for the Wellington region.

7	Proposed Supporting Targets <i>As noted in the general targets commentary section above, we believe that this section of targets are actions, not targets.</i>	Comments and recommended changes
	nitrous oxide, ozone, particulates and sulphur dioxide. To help councils meet these standards further targets are being proposed within the vehicle fleet strategy discussion paper.	
7.14	Implement the Sustainable Water Programme of Action and develop a National Environmental Standard on Drinking Water Quality.	We support this initiative.
7.15	Develop storm water guidelines by 2009.	We support this initiative.
7.16	The maritime industry has an outcome target to reduce the amount of oil spilled from vessels into the marine environment by 50 percent by 2010.	We support this initiative.
7.17	Targets for harmful noise and air emissions (such as Nitrous Oxide and particulate matter) are discussed under the public health objective.	We support this initiative.

5. Implications for Local and Regional Councils

- 5.1 While we generally support the proposed targets, many of which seek ambitious increases in passenger transport and active mode use, we note that there will be significant local share funding issues with achieving these targets. For transport activities, rates and fares are the key local funding sources which are already stretched to address rising operating costs and extensive infrastructure renewals.
- 5.2 A recent Local Government Rates Inquiry undertaken by the Department of Internal Affairs found that under current practices, rates will not be sustainable in 10 years' time and that new funding sources will need to be provided. In addition, passenger transport users in the Wellington region have faced significant fare increases over the past 15 months and those increases are likely to continue due to increasing operating costs. Therefore, we strongly support a review of financial assistance rates, particularly in relation to passenger transport and active modes (walking and cycling).
- 5.3 We note that many RLTSs have only recently been reviewed and regional targets have been developed based on the data currently collected and likely to be available. Some of the proposed targets are similar to targets in the Wellington RLTS, but even these often use slightly different criteria and will require new and different methods of collecting data for monitoring purposes. We note that requiring regional and local authorities to monitor a new set of indicators is likely to have additional resource and cost implications for those organisations.

6. Concluding Comments

- 6.1 While Greater Wellington supports the intention that the UNZTS will inform both new strategies and the implementation and review of existing transport strategies relating to rail, walking and cycling and State Highways, we believe that the discussion document does not assist in providing clarity for the strategic direction of transport in New Zealand, nor does it sufficiently acknowledge and address the significant additional costs involved with implementing the targets set out in the document, or where the funds should be sourced to pay for them.
- 6.2 Given the comprehensive list of proposed targets set out in the discussion document, Greater Wellington questions whether the government should in fact be developing a National Land Transport Strategy from this discussion document. Including the proposed targets as part of a National Land Transport Strategy would mean that the relevant transport agencies would be required by the Land Transport Act 1998 to develop their strategies consistent with achieving these targets.
- 6.3 Finally, we believe that this document would be a good place to commence the discussion on the merits of weighting each the NZTS objectives in order to provide clarity about each of the objective's relative importance to one another.

Signed on behalf of Greater Wellington Regional Council:

Hon. Fran Wilde
Chair