

SUBMISSION

**Wellington City Council submission to
the Ministry of Transport on the
Discussion Paper:**

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

February 2008

1. Introduction

Wellington City Council (WCC) thanks the Ministry of Transport (MoT) for providing the opportunity to make a submission on the Sustainable Transport discussion paper. WCC fully supports the government's ambition to be the first carbon neutral country in the world and has recently also adopted a similar target for the city. WCC is very supportive of the general direction expressed in the document and applauds the significant emphasis placed on sustainability proposed for the Update of the New Zealand Transport Strategy (UNZTS) as outlined in the discussion paper.

At the same time WCC has several concerns in relation to the content of the paper, particularly in relation to exactly how and to what extent the proposed transport targets will achieve the intended outcomes. WCC is concerned by what it sees as shortcomings in the analysis and logic flow of the document. These concerns are outlined below.

2. Discussion

WCC notes the following points in relation to the discussion paper:

- 1) Our overarching comment is that the document contains insufficient analysis to justify the conclusions reached and the targets set. For example, does it follow that if all of these targets are achieved, per capita domestic greenhouse gas (GHG) transport emissions will be halved by 2040?
- 2) There is very limited discussion of the relative contributions of each of the targets and intermediate targets. While there are emission reductions figures quoted in regard to the biofuels sales obligation (over 1 million tons of CO₂ emissions saved between 2008 and 2012) and reducing single occupancy vehicle trips and improving the fuel economy of vehicles entering the light vehicle fleet (1.3 million tons of CO₂ emissions saved by 2015 combined), analysis beyond this appears to be very limited. If the impact of achieving a given target is unknown, how has it been established that it is an appropriate target to begin with?
- 3) Many of the targets seem to be 'stretch targets' with little supporting analysis as to their realism or achievability. For example, in relation to freight movements, is it really achievable that the combined modal share of coastal shipping and rail will move from 33% to 55% between now and 2040 when recent trends both domestically and internationally have been moving in the opposite direction and only 3-7% of current road freight is contestable by rail?
- 4) Many targets are inadequately specified e.g. "travel times by all modes will be predictable" – this needs to have a performance indicator added such as 'no more than 5 minutes delay'.
- 5) Lack of analysis leads to the risk of inefficient resource allocation through the various interventions proposed. The consequences of not understanding the

full implications of poor planning do not appear to have been adequately considered. For example, a project may be undertaken on the expectation that it will lead to reduced GHG emissions. It may later be established that the impact on GHG emissions is in fact minimal. Had this information been known upfront the project may not have been undertaken and the funding could have been used for a project that had been accurately analysed to show that it would have a real impact on reducing emissions.

6) It seems very unlikely that all the targets are achievable within the proposed time frame given current funding levels. The cost consequences of the proposed targets on the various players including local authorities do not appear to have been considered.

7) The cost effectiveness of the various targets does not appear to have been examined. Given the likelihood that not all targets are immediately affordable, there is no guidance on which measures would provide the most cost effective returns in terms of achieving the goal of reducing GHG emissions, and therefore which measures would be more suitable to focus on in the short-medium term. Simply providing a menu of options is not helpful.

8) It is very unclear how each of the targets should be taken into account by Territorial Authorities and Regions when planning at the local and regional levels. This is particularly so given that several of the targets need to be implemented at the national level. The degree of influence that Territorial Authorities or Regions will have in contributing to or achieving these targets will be very limited in most cases. For example it is not clear how the targets relating to improving coastal shipping's and rail's share of domestic freight should be taken into consideration by Territorial Authorities or Regions when planning a project. It is stated that the final Update of the New Zealand Transport Strategy will contain an action plan including accountabilities for actions reflecting how the transport targets will be reached, but how specific such an action plan will be remains to be seen, and at first glance it would appear that the historical problem of not having enough guidance in terms of considering the five objectives whilst undertaking planning at the local/regional level may not be solved, but simply put into another format.

9) Closely related to the above point is how each of the five objectives/transport targets should be prioritised or weighted against one another when evaluating a project at the local or regional level. That is, in the event that a proposed project is successful in achieving one target but not another, how will they be traded off against one another to decide whether to proceed with the project. Given that the document reinforces the government's two overarching aspirations of transforming the New Zealand economy and achieving environmental sustainability, it could be inferred that the objectives of ensuring environmental sustainability and assisting economic development would take preference over the other three objectives, but this is not made clear.

10) WCC is particularly concerned that this document is intended to inform the drafting of the Government Policy Statement (GPS) with the opportunity

to influence the GPS being limited to consultation with the Local Government Transport Reference Group. This is made even more important by the fact that the GPS is to contain funding level information by activity class as well as a prioritisation methodology and it is assumed that both of these items will be correlated to the strategic direction set out by the UNZTS. Given the importance of the GPS we believe it needs to more widely circulated than is currently being proposed and feel that Territorial Authorities and Regional Councils should have the opportunity to see the draft GPS and prepare formal submissions should they choose to.

In summary the core structural problems with the discussion document are:

- 1) It fails to provide a sufficient rationale for the various numerical targets set.
- 2) It fails to establish that the proposed interventions are, on balance, beneficial.
- 3) It fails to establish that the various targets are achievable.
- 4) It fails to identify whether, if all the lower level targets are met, we will achieve the top level targets.
- 5) It fails to provide any analysis of whether the intermediate targets are achievable and if so, how.

3. Recommendations

The Council recommends:

- 1) That further work is undertaken on the relative merits of the proposed targets to establish their relative merits and achievability. While this may take some time to complete, it should be borne in mind that it is directed towards 30 year outcomes, and therefore needs to be undertaken with an appropriate degree of deliberation and to ensure the targets are enduring.
- 2) That in the interim, to maintain momentum, two or three priority targets are identified which yield high returns for the investments involved, so that work can start on implementing these.
- 3) That Territorial Authorities be given the opportunity to be involved in the development of a suitable prioritisation methodology to provide guidance on the allocation of future transport funding.
- 4) That there is a clearer statement of the rights and obligations of the regional community in contributing to the funding and implementation of the measures.
- 5) That Territorial Authorities be given the opportunity to prepare a formal submission on the draft GPS.