



2 April 2024

To Whom it May Concern,

We are writing with regard to the draft Government Policy Statement on Land Transport 2024- 2034 (**GPS**).

The Lightfoot Initiative Charitable Trust (Lightfoot) would like to raise the following points regarding the draft GPS 2024.

#### Section 2 – System Reform

- Lightfoot supports the proposal of new legislation proposed in Section 2.4 to reform the NLTF revenue system, specifically the time-of-use charging to reduce congestion.
- Lightfoot would like to propose that additional legislation should be considered to include levies on rental cars as a form of income that could contribute to funding infrastructure or active travel. As of 2023, there were 37,000 rental vehicles available in New Zealand<sup>1</sup>, creating a rich source of income for local and/or regional governments that are most affected by the impacts of this class of vehicle.
- Lightfoot believes that climate change and greenhouse gas emissions from transport have not been sufficiently taken into account. In section 2.6, reference is made to the second Emissions Reduction Plan, which will be developed after the GPS 2024 is published. We urge you to better recognise the role that transport plays in adding to green house gas emissions in Aotearoa New Zealand. Cross-sector policy is the best method of ensuring that we address climate change effectively, however we believe that a stronger approach is needed in the GPS 2024. The Transport sector is a place where rapid change and innovation is not just possible, but also achievable. In Lightfoot's opinion, the Transport GPS should be 'driving' change.

#### Section 3 – Strategic Priorities

- The efficient movement of people and freight are a significant threat to economic growth and productivity, so Lightfoot recognises and supports the urgency that the government is placing on increasing capacity through the proposed Roads of National Significance, key rail freight corridors and major public transport projects.
- However, a focus on increasing single occupancy vehicle access to greenfield land for housing development is unlikely to solve congestion issues. Transport systems in key areas run at capacity. Building more roads will not reduce congestion or the number of people on the road. The Jevons paradox can be applied here. Increasing efficiency or capacity induces an increase in demand so that the resource use is increased. To ensure that the best economic use of any future transport developments happens, a focus on encouraging shared modes of transport is needed (car or

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<sup>1</sup> <https://www.statista.com/statistics/735184/new-zealand-currently-licensed-rental-cars-by-licensing-period/>

vanpooling, buses, high-capacity rail)<sup>2</sup> along with more intensive urban development that limits the need for people to travel for work and recreation.

- Where major infrastructure developments occur, the addition of active travel infrastructure should be automatically included. This should include the future capability for bus-priority lanes and stops, plus cycle and pedestrian infrastructure. There is a significant Benefit Cost Ratio (BCR) of 11:1 on investment in active travel infrastructure.<sup>3</sup> There are localised examples and research available to support this.<sup>4</sup> In New Zealand, transport planners estimate money spent on high-quality cycling infrastructure yields benefits between ten and 25 times the costs.<sup>5</sup> This research is not new. Major infrastructure is needed, and the draft GPS recognises this, however we are missing an opportunity if we do not future proof our transport infrastructure.
- Lightfoot support the major infrastructure and public transport projects proposed in the draft GPS. However, the 'Queenstown Package' and 'Queenstown Transport Connections' are currently referenced in Appendix B of the GPS only. The contribution that the Queenstown Lakes District makes to the GDP, coupled with the issues of congestion, require these two projects to be recognised as significant national infrastructure works that should be included in the body of the GPS 2024 as a key strategic priority.
- Lightfoot support the intent of a balanced investment programme for different types of interventions such as public and active transport, alongside roading. However, the GPS should not disincentivise public transport by requiring greater public transport farebox recovery (user pays). Decisions about revenue recovery for public transport should be considered in the next GPS, as there has been limited time to gather accurate data post Covid-19.
- Lightfoot do not support the changes proposed to speed limits.

#### Section 4 – Investment in land transport

- The case for investment in active travel, eg: walking and cycling has been clearly established in the literature, and previously in this submission. Lightfoot agree that clear benefit should be established for the development of walking/cycling infrastructure. However, this is hard to quantify in locations where unsafe or non-existent infrastructure limits current use or significantly reduces volume. Therefore, other means of assessing benefits need to be established.

#### Final Comments

The Government Policy Statement on Land Transport 2024-2034 does not take New Zealand far enough in reducing the climate impact of transport. The Emissions Reduction Plan (ERP1), states that transport emissions should fall 41% by 2035. The Ministry of Transport has indicated that, "Achieving this will reduce our dependence on fossil fuels and give us a more sustainable, inclusive, safe and accessible transport system that better supports economic activity and community life."

The plan is supported by four specific transport targets:

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<sup>2</sup> <https://www.mckinsey.com/~media/mckinsey/business%20functions/operations/our%20insights/building%20a%20transport%20system%20that%20works%20new%20charts%20five%20insights%20from%20our%2025%20city%20report%20new/elements-of-success-urban-transportation-systems-of-25-global-cities-july-2021.pdf>

<sup>3</sup> <https://pubmed.ncbi.nlm.nih.gov/29751618/#:~:text=Using%20a%20discount%20rate%20of,measurable%2C%20positive%20return%20on%20investment.>

<sup>4</sup> <https://openaccess.wgtn.ac.nz/articles/thesis/Active%20Investment%20Evaluating%20the%20Benefits%20and%20Costs%20of%20Investing%20in%20Active%20Travel%20in%20the%20Urban%20New%20Zealand%20Context/17143244>

<sup>5</sup> <https://ehp.niehs.nih.gov/doi/10.1289/ehp.1307250>

- Target 1 – Reduce total kilometres travelled by the light fleet by 20 per cent by 2035 through improved urban form and providing better travel options, particularly in our largest cities.
- Target 2 – Increase zero-emissions vehicles to 30 per cent of the light fleet by 2035.
- Target 3 – Reduce emissions from freight transport by 35 per cent by 2035.
- Target 4 – Reduce the emissions intensity of transport fuel by 10 per cent by 2035.

Many of the proposed reforms in the GPS are antithetical to what is trying to be achieved in the ERP1, and will likely decrease New Zealand's resilience and economic growth longer term. Lightfoot urge Minister Brown to better consider the targets established in the ERP1 in the final development of the GPS.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Amanda Robinson', written in a cursive style.

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