



14 September 2023

GPS Team
Ministry of Transport

Email: GPS@transport.govt.nz

Tēnā koutou

RE: DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2024

Thank you for the opportunity to provide feedback on the Ministry of Transport's consultation on the Draft Government Policy Statement on Land Transport 2024 (GPS – LT 2024).

Engineering New Zealand (formerly IPENZ) is New Zealand's professional home for engineers. We are New Zealand's strongest and most influential voice on engineering issues, with more than 24,000 members who want to help shape the public policy agenda and engineer better lives for New Zealanders.

GENERAL COMMENTS

Engineering New Zealand generally supports the overall direction of the draft GPS – LT 2024. This submission raises our support for some of the changes, including the shift in strategic priorities from "climate change" to more clearly articulate "increasing resilience" and "reducing emissions", and the emphasis on existing asset maintenance.

This submission also raises our concerns with the plan's reduced focus on safety and the omission of "better travel options" as a distinct strategic priority. It is our view that the change in focus regarding safety weakens the plan's commitment towards achieving zero deaths and injuries by 2050 (as committed in the GPS – LT 2021).

WE WELCOME THE STRENGTHENED COMMITMENT TO ADDRESSING CLIMATE CHANGE

In GPS – LT 2021, climate change was outlined as a standalone strategic priority. In GPS – LT 2024 we see climate change divided into two aspects, reflecting the need to both mitigate (reduce emissions) and adapt to climate change (increase resilience). We agree that these two strategic priorities work together to address climate change and welcome the change.

We support including increasing resilience as a strategic priority

Increasing the resilience of our land transport system is critical and we strongly welcome its inclusion as a strategic priority for GPS- LT 2024. Significant aspects of our land transport system are designated as a lifeline utility under the Civil Defence and Emergency Management Act 2002. As seen in the aftermath of Cyclone Gabrielle, any disruption to our land transport system can lead to

significant economic costs and devastating consequences for our communities. Given the expected rise in extreme weather events, it is critical that we ensure the resilience and safety of our land transport system.

We support reducing emissions as a strategic priority

We welcome the strengthened commitment to reducing emissions in the transport sector. Transport accounts for 17 per cent of Aotearoa New Zealand's total emissions. It is our view that government's decision to include reducing emissions in the strategic priorities for GPS – LT 2024 is a step forward, aligning policies with legislation and broader sustainability goals. This change will provide the necessary direction (and funding) to support the transformation of the land transport sector to achieve New Zealand's emissions reduction targets.

WE WELCOME THE COMMITMENT TO MAINTAINING OUR CURRENT ASSETS

We support the focus on maintaining the condition of the existing transport system, within reasons, particularly after the severe weather events this year.

Overall investing in maintaining our existing land transport system is cost-effective and environmentally sustainable for the current time. Given likely changes in land transport modes in the future, maintenance, rather than expansion, is preferred. This significantly reduces both embodied and whole-of-life carbon emissions.

TRAVEL OPTIONS NEED GREATER CONSIDERATION

We commend the strengthened commitment to maintaining and investing in our rail and inter-regional public transport connections. However, we are concerned that "better travel options" have not been explicitly included as a strategic priority in GPS – LT 2024.

While we recognise that the importance of travel options is integrated into the sustainable urban and regional development priority, it is our view that it lacks explicit emphasis. There is risk that the lack of explicit recognition of better travel options could hinder efforts to promote and improve various transportation alternatives, which are vital for achieving sustainable, efficient, and accessible transportation systems. Including better travel options as a strategic priority in GPS-LT 2024 would help ensure that the necessary resources are in place to support evolving mobility needs and address environmental concerns.

SAFETY NEEDS GREATER CONSIDERATION

We are concerned with the change of strategic direction regarding safety in the draft GPS – LT 2024. In GPS – LT 2021, the strategic priority for safety was to "develop a transport system where no one is killed or seriously injured". In the draft GPS – LT 2024, this has been changed to "transport is made substantially safer for all." This change conveys a significant shift in the government's attitude towards their commitment to achieving zero deaths and serious injuries by 2050. We are disappointed with this change.

We are also concerned with the removal of the reference to "safe and inclusive access" in the action for climate change, which was previously included in GPS – LT 2021. It is our view that these

changes have significantly weakened safety as a strategic priority overall. We recommend that the Ministry of Transport reconsider these amendments and provide greater consideration for safety in the finalised GPS – LT 2024.

CRITICAL WORKFORCE SHORTAGE NEEDS TO BE ADDRESSED

Engineering New Zealand welcomes the proposed increase in funding for land transport. This investment is essential to address the pressing challenges and opportunities in Aotearoa New Zealand's transportation infrastructure. While the additional resources are a step in the right direction, it's imperative to recognise the existing workforce shortage crisis. The demand for skilled engineers is already at an all-time high, raising significant concerns about our ability to meet the goals outlined in GPS – LT 2024.

To address this, government must invest in education and training programmes aimed at producing more skilled engineers in Aotearoa New Zealand. Fostering and growing our engineering talent pool will ensure that we have the skilled professionals that we need to successfully implement critical infrastructure projects and developments over the long term. This is essential in order to bridge the workforce gap and meet the infrastructure demands of the future.

CONCLUSION

Thank you for the opportunity to provide comment on the Ministry of Transport's consultation on the draft GPS – LT 2024. As outlined, we generally support the overall direction of the draft GPS – LT 2024. We recognise that the work ahead is significant, and engineers will play a significant role in this work. If we can be of additional support, please do not hesitate to contact me by emailing richard.templer@engineeringnz.org or 021 22 000 50.

Ngā mihi

A handwritten signature in blue ink, reading "R. Templer". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Dr Richard Templer, FEngNZ
Chief Executive