8 August 2014

GPS Engagement Team
Ministry of Transport
PO Box 3175
Wellington 6140

Email: GPS.2015@transport.govt.nz

Dear Sir/Madam

The Cycling Advocates' Network (CAN) appreciates the opportunity to make a written submission on the *Engagement Draft Government Policy Statement 2015/16-2024/25* (hereafter draft GPS 2015).

CAN is the overarching body of the national network of cycling advocates. It is a voice for all cyclists - recreational, commuter and touring. Its membership includes over 400 paid members with more than 1500 additional 'friends' who are on an email network.

This current submission has been prepared by members of the Cycling Advocates' Network (CAN). CAN and its member groups take a very close interest in the draft GPS as we recognise its profound influence on the quality of the cycling environment. We are disappointed that historical underfunding of cycling infrastructure has meant most road controlling authorities (including quite large councils) often have limited capability for cycle planning and they are not able to deliver on projects sought by their community. This in turn feeds a 'vicious circle' where government policy documents such as the GPS do not provide more equitable levels of funding.

CAN supports all its member groups and individual members and others in the community who see a more equitable level of funding for active transport through this draft GPS. CAN requests that this draft GPS be thoroughly revised and further analysis and new funding

levels be provided in the next GPS that will (1) ensure that infrastructure for active transport modes is more adequately funded and (2) improve the safety of the land transport system for vulnerable road users especially those using active transport modes given that Census 2013 data indicates that the number of people biking to work has increased by 16 percent since 2006. While this increase is not evenly distributed nationally it is very significant that more New Zealanders seek to use a bicycle for their journey to work. For many it will reflect concerns about the health and environmental impacts of using private vehicles. Funding for the land transport system must ensure that the needs of cyclists are more effectively addressed in the land transport network.

Based on international and local research and analysis, CAN argues that the funding priorities put forth in the draft GPS 2015 will not achieve its stated outcomes of:

- A strong and continuing focus on economic growth and productivity
- Road safety
- Value-for-money

The draft GPS 2015 promotes investment in roading projects without robust analysis of cost or benefit, or impacts on the wider land transport system. Road safety, active transport infrastructure and even public transport projects offer better value for money and greater safety improvements. A smart, future-proofed transport policy must also plan for a future without cheap energy and resources, requiring more efficient and effective utilisation of resources (materials and land) than for roads and parking.

In the following submission we outline our concerns about the draft GPS in relation to:

(1) overall strategic priorities and objectives
(2) safety and
(3) value for money.

We then outline specific concerns.

Comments on Strategic Priorities and Objectives

A Strong and Growing Economy

On page 2 the draft GPS 2015 states that from 2009

> *the Government focused on enabling economic growth rather than simply responding to it, providing high quality connections between key areas of production, processing and export. Continued funding under GPS 2015 (draft) for State highway improvements will bring benefits for national economic growth and productivity, particularly given that State highways carry most freight and link major ports, airports and urban areas"*

What we are seeing in the draft GPS, however, is a very reactive response to population and economic growth in Auckland with inadequate investment to enable economic growth in other regions.

Furthermore, despite some increased investment in public transport and active transport, these modes receive disproportionate levels of investment relative to their economic returns to New Zealanders. The draft GPS 2015 continues emphasis of the 2009 and 2012 GPSs on vehicles (especially single occupant vehicles that are used by so many commuting and other utility journeys). The level of funding in Roads of National Significance (RONS) undermines public transport, local roads and rail investment, limiting the economic growth potential of many regions and diminishing the resilience of our transport network. Inadequate investment in local roads is resulting in a road environment in most urban areas that discourages active transport modes.

Greater use of active transport has economic benefits associated with increased happiness[1], lower health costs[2], and reduced fuel costs. Significant on-going benefits accrue to all if money stays within the local economy instead of going offshore to purchase vehicles, parts and fuel.[3] New Zealand's balance of trade position is improved.

The draft GPS 2015 fails to properly credit the contribution multi-modal transport to our social, cultural, physical and economic wellbeing, and the quality of our natural environment. Wise investment in public and active transport offers current and continued economic, health, safety, resilience and improved environmental outcomes.

Building new roads to ease congestion does not work and has been shown to be counterproductive.[4]

The World Energy Council's latest Energy Issues Monitor[5] reports that there is currently *unprecedented uncertainty* with regard to oil prices and availability. The draft GPS 2015 instead plans investments in a transport system that assumes that there will be no problem with either the cost or availability of oil thereby sentencing New Zealanders to very high levels of spending on a transport mode that has not grown in the last six years[6] despite growth in population.

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[1] http://www.bicycling.com/training-nutrition/training-fitness/your-brain-bicycling
http://www.health24.com/Fitness/Leisure/Bicycling-the-happiest-form-of-transport-20140604#.U5ErPZXm4th.twitter

[2] For a review of studies that have quantified the economic benefits of interventions to increase walking and cycling for transport see http://www.cph.co.nz/Files/QuantEconBenefitPhysicalActive.pdf
See also a University of Auckland study quantifying economic benefits of investment in cycling infrastructure https://www.auckland.ac.nz/en/about/news-events-and-notices/news/news-2014/02/cycling-infrastructure-more-economic-than-for-other-transport.html
Australian study on economic benefits of cycling http://www.smh.com.au/national/bike-riders-save-economy-21-on-each-commute-20130730-2qxdg.html
Article on Environmental and traffic congestion benefits of cycling http://www.sharetheroad.ca/what-are-the-environmental-traffic-congestion-benefits-of-cycling--s16223
http://www.nzta.govt.nz/resources/research/reports/530/docs/RR-530-Reallocation-of-road-space.pdf

[3] Cycling Means Business – The Economic Benefits of Cycling Infrastructure, Darren Flusche, League of American Bicyclists

[4] What's up with that; Building Bigger Roads Actually Makes Traffic Worse Adam Mann http://www.wired.com/2014/06/wuwt-traffic-induced-demand/

[5] http://www.worldenergy.org/publications/2014/world-energy-issues-monitor-2014/

[6] http://transportblog.co.nz/?s=peak+car&submit.x=17&submit.y=13
http://www.stuff.co.nz/motoring/news/9769997/Analysts-envision-Peak-Car-within-a-decade

We argue that the draft GPS 2015 lacks robust analysis of risk to the system and ways that risk might be mitigated. In addition to energy concerns, the increasing likelihood of extreme weather events, and the risk of natural disasters such as the Canterbury earthquakes are not properly acknowledged. Following earthquakes many people found bicycles were a much more viable form of transport than cars because of the condition of transport network. In Christchurch, as in other parts of New Zealand, growth in the numbers using active transport, especially bicycling, shows that health promotion messages and economic and environmental benefits are spurring New Zealanders to seek out healthy, low cost and low impact modes of transport. The draft GPS 2015 significantly undervalues the economic benefits of this trend.

Many countries and cities have found that cycling, walking and public transport significantly reduce roading capital and maintenance costs while being more effective at congestion reduction than conventional approaches.

Analysis in the draft GPS 2015 does not reflect current best practice in land transport planning. The draft GPS appears to be based on the premise 'Build it and they will come' and the assumption that building more and bigger roads are needed because of population and/or economic growth - and to reduce congestion. Internationally (and in NZ) there is extensive evidence that population and economic growth can and must be decoupled from traffic growth - and that any reduction in congestion is temporary at best. New and more roads for motorised induce traffic growth and exacerbate peak hour congestion.

In contrast, more walking, cycling and public transport infrastructure, as well as car pooling, teleworking and related initiatives to reduce travel at peak times will increase demand for alternative modes and achieve more efficient use of existing road capacity and more fiscally and environmentally sustainable reduction in congestion.

Safety

The technological and engineering approaches to safety found in the Safer Journeys safe system approach go only so far. The emphasis on motorised transport, especially with ever more trucks, will lead to congestion, conflict and accidents. Reducing congestion through reducing the number of motorised vehicles on the roads through sea and rail freight as well as quality active and public transport will reduce the accident toll. The 'safety in numbers' found when more people cycle has been proven in most places including New York City where even minimal cycle infrastructure has been provided.

Value for Money

Heavy dependence on private vehicles for movement of people and freight by road is costly, in energy, accidents, infrastructure, maintenance and pollution. The proposed level of funding for motorised vehicle infrastructure in the draft GPS 2015 will not achieve the government's and the community's goals of resilience, efficiency, reliability and value for money.[7] Local Government New Zealand has consistently argued that the focus on big

[7] The High Cost of Car Dependency, Julie Anne Genter http://thedailyblog.co.nz/2013/07/09/trainspotting-the-high-cost-of-car-dependency/

roading projects should be replaced with a model that funds all modes for both current and future needs.[8]

Moving significantly more freight off roads and onto ships and trains will help to meet the strategic priorities of economic development, safety and value for money. Sea and rail freight are an integral part of our transport system. Their contribution needs to be recognized and funded appropriately in this GPS in order to ensure long-term economic growth. The draft GPS 2015 appears to focus on short-term growth at best and disregards long-term consequences of underinvestment in a key pillars of an efficient and effective land transport system.

Funding to upgrade and expand sea and rail freight will contribute to sustainable economic growth. As a nation, we need to be encouraging the use of fuel efficient options such as rail and shipping and building their capacity to do more as oil becomes more expensive. Sea and rail also provide an alternative means to supply cities when they are cut off through natural disaster. Christchurch and the South Island as a whole would have been better positioned in the recovery following the earthquakes if it had not been so reliant on road transport from the north.

The draft GPS 2015 continues the tradition of government subsidising roads for trucks and cars. This distorts the market place and limits transport options. A different emphasis in the GPS - one that focuses on active transport - would send a clear message to territorial authorities that these transport modes are to be encouraged and that central government supports them.

To achieve its priorities and objectives the GPS must allocate significantly more funding to the development of active and public transport infrastructure. On page 8 the draft GPS states that New Zealand's major urban centres are more densely populated than centres in Australia and the US. Walking and cycling together make up between 7% and 20% of urban commutes, depending on area, yet receive less than a third of one per cent of funding in the draft GPS 2015. Cycling, walking and public transport infrastructure can bring New Zealand into the 21st century so that our cities and towns can compete with other cities worldwide to attract and retain talent. The draft GPS 2015 continues and intensifies a trend towards car-based urban environments which detract from liveability. Increased levels of traffic will mean New Zealand cities become more unaffordable, congested, noisy, polluted and unattractive where people do not have choices about their mode of transport. This is a concern in an increasingly globalised economy where cities compete with one another to attract investment from global countries and seek high rankings in indices of liveability. Building on the country's natural assets, New Zealand cities and businesses have enormous potential to attract more international investment through promoting liveability.

Specific Comments

Page 2

[8] Councils Tackle Government on Big Roading Projects, Matthew Dearnaley, NZ Herald, 13/04/09 http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=10566387

Wording change needed to the following as highlighted

> The overall proposal for the national strategic direction for land transport is as follows: To ~~drive~~ ensure [or foster] improved performance from the land transport system by focusing on:
>
> - resilience
> - economic ~~growth and productivity~~ well-being for all New Zealanders
> - road safety
> - value for money
> - health

We do not support continuing the emphasis since 2009 of putting the wealth generating capacity of our economy at the top of the agenda. The experience of natural disasters (in particular, the Canterbury earthquakes of 2010-2011 but also volcanic activity and flooding such as the Northland flooding this year) suggests a much greater emphasis needs to be placed on resilience.

We also expect the draft GPS 2015 to acknowledge the very significant health impacts of our land transport system. The increasing incidence of obesity and various illnesses associated with lack of physical inactivity is widely recognised as being exacerbated by the lack of active transport.

Also, we do not support the use of the term 'drive' which seems intended to put a focus on driving in both senses of the word which is unnecessary.

A section is therefore needed on page 2 prior to the section with the heading **Supporting economic growth and productivity.** This should address resilience to natural disasters, climate change (noting the evidence about climate change in Australasia in Volume II Chapter 25 of the recent IPCC Fifth Assessment report[9]), volcanic activity, and energy insecurity.

Page 4

We recommend a change of wording in para 5 to reflect the recommended and necessary focus on resilience as follows

> • **in the public interest** where it supports economic, social, cultural and environmental wellbeing in a resilient manner and in a way that promotes health

Page 6

We note the comment in para 20:

> Future GPSs could cover transport regulation. Decisions to further investigate these issues lie outside of the GPS and may require legislative change.

[9] http://ipcc-wg2.gov/AR5/images/uploads/WGIIAR5-Chap25_FGDall.pdf

We do not see the need for GPS to cover transport regulation and request that the section on Regulation be removed. If it is not to be removed there needs to be a clear rationale for a GPS to include regulation.

Section 2 Context

As noted above, the analysis in the draft GPS 2015 needs to be expanded and more robust. The Context section has numerous gaps and shortcomings. In particular, it does not acknowledge and offer options for mitigating the effects of the uncertain and dynamic international energy environment that New Zealand operates within, including the unprecedented uncertainty of oil prices in the near, mid and long term.

The World Energy Commission's 2014 *World Energy Issues Monitor* highlights the current time as one of unprecedented uncertainty for the energy sector, and a strong need to transform the energy system. Furthermore, it notes that "business as usual" is not an option.[10]

A large proportion of energy consumption is related to transport which as the draft GPS notes is critical for well-being. This unprecedented uncertainty about a resource central to transport needs must be clearly acknowledged.

Page 8

Please include data on cycling and public transport and walking in the section on Existing demand (p8).[11] There is no mention here of demand for public transport and demand for cycling and walking. This is a serious oversight which may explain limited focus found in the draft GPS 2015. The 2013 Census, local government, universities, MoT and NZTA can all contribute here.

This section needs to include data on forecast demand for cycling, walking and public transport. These transport modes are increasing in popularity and their contribution must be recognized and encouraged. To be a credible document the GPS must cover all transport modes and consider the contributions the country requires from all of them. The draft GPS 2015 assumes and promotes the current modal share without regard for long-term viability. Instead, it needs to promote a decrease in the proportion of trips made by single occupant vehicles and in the proportion of freight moved by road.

Instead, the section 'Existing demand' needs to include data on trends in car ownership in New Zealand and elsewhere which peaked in the mid-2000s. This is a positive development for increasing resilience to future oil shocks and has economics benefits that are not acknowledged in the draft GPS 2015. The 'softening' in demand may be seen as an opportunity to encourage a greater shift in travel demand through provision of better infrastructure for public and active transport modes. Intensification should be regarded as contributing positively to public transport patronage and not assumed to contribute to congestion.

[10] http://www.worldenergy.org/data/issues/
[11] http://www.nzta.govt.nz/resources/research/reports/340/docs/340.pdf

CAN notes that despite the development of the RONS and a strong focus on providing for motor vehicles since 2005, there has been no improvement in congestion in Auckland or Christchurch - though motor vehicle usage and petrol consumption have remained flat since 2006. The analysis in the draft GPS 2015 does not recognise this and fails to offer a critical assessment of the functioning of the land transport system and impacts of funding in the previous GPS.

Page 9
In para 36 there should be discussion of the importance of decoupling population and economic growth from traffic/travel growth. The advent of Web 2.0, with the expansion of e-government, e-business and social media are further reinforcing the "muted" growth in personal and other travel.

Page 10
CAN recommends that the draft GPS 2015 should include a new section on Energy after Section B Demand to document changing availability, cost and sources of energy.

In para 45 a more robust analysis is needed than the assertion "vehicle travel will continue to account for 80 percent of daily trips".

The assertion reflects a very weak commitment to promoting a genuinely multi-modal transport and an assumption that alternatives to vehicles will play a residual role.

Para 46 reflects a reactive approach to transport investment and seeks to justify increased expenditure on RONS and state highways as a response to growth. It also fails to recognise that active transport and public transport infrastructure is also a way of accommodating new and current transport demand while mitigating congestion. If this section remains, the wording needs to be amended as follows:

> To accommodate new demand, further increases in the capacity of active transport and public transport infrastructure and the roading network, particularly those sections currently experiencing severe congestion, will remain a priority

There is no acknowledgement in the draft 2015 of the significant positive effects that improving provision for cycling, walking and good public transport can make to congestion in our bigger cities, road safety, public health, future road maintenance costs, economic development and productivity and citizen wellbeing, and, because of this, to the value for money priority. Moreover, a lack of congestion, paradoxically, does not lead to high productivity or economic growth.[12]

[12] The Mobility-Productivity Paradox: Exploring the negative relationships between mobility and economic Productivity http://www.vtpi.org/ITED_paradox.pdf

Section 3 Strategic Direction

Page 13

Amend para 52 in line with our suggested wording change on page 2 above (i.e. economic well-being for all New Zealanders, resilience and health). This reflects the recognition that a narrow preoccupation with economic growth does not ensure equitable distribution of the benefits of growth.

Resilience and health have economic benefits. The more people use active transport modes, the less taxpayers have to spend on diseases of inactivity such as Type 2 diabetes, heart disease, obesity and cancer[13].

Amend para 56 to acknowledge that increased numbers of people walking and cycling will result increased safety for these modes. Research on cycle crashes has shown that greater numbers of cyclists can decrease the seriousness of cycle crashes.[14]

House prices and rents increase in areas where there are better facilities for walking and cycling indicating that people value these facilities and gain wellbeing from being in places where active transport infrastructure is provided.

Section 4 Strategic Objectives and Results

Page 12

The five objectives are supported. Objectives and results, however, do not have a clear or sufficiently strong relationship.

Table 1 needs to be amended to ensure Results reflect suggested changes above to Section 3. On subsequent pages a broader set of results is needed to achieve the objectives. It needs to be clear that investment will enhance transport choices. As noted above, active transport and public transport are very appropriate transport choices and contribute to economic well-being. However, current and historical underfunding of these modes have constrained people's choice to use these modes.

The environmental impacts of increased road construction and increased reliance on road transport for movement of freight and people undermine the prospect of appropriately mitigating the environmental effects of land transport. Continuing underinvestment in active and public transport will not allow current and future demand to be met. It is not clear how appropriateness is determined.

Page 13

Para 67 needs to be expanded to acknowledge that New Zealand's urban cycling infrastructure and public transport infrastructure do not compare favourably with relevant

[13] Literature Review of wider health and wellbeing impacts of transport http://ecan.govt.nz/publications/General/HIA%20Literature%20Review%20June%202010.pdf

[14] Recent data from the Portland Office of Transportation reinforced Jacobsen's finding: cycling rates soared since the early 1990s while the crash risk per rider dropped by about 70%. http://www.sharetheroad.ca/what-are-the-environmental-traffic-congestion-benefits-of-cycling--s16223

international comparators and that both require significant investment to ensure there are effective networks.

Para 68b is a reactive measure to traffic growth in Auckland - seeking to accommodate increased traffic rather than manage growth and decouple it from economic and population growth. Catering to increased traffic growth in Auckland will undermine efforts to increase active and transport modes which allow much more efficient use of existing network capacity and reduce the need for costly additional infrastructure. We support accelerated investment in public transport and active transport in Auckland, both of which have significant economic benefits. We request that the following wording be added to this para:

> *Investment in a comprehensive, separated cycling network and improved public transport will help make Auckland more connected, liveable and prosperous and decrease congestion for a relatively small cost.*

Page 14

Para 69 should note the significant gains from increased use of active and public transport for improved returns from investment in road maintenance.

Page 14

Para 72 recognises the importance of continued investment in public transport to increase total system capacity. A similar paragraph should be added to the draft GPS 2015 to recognise the importance of developing and maintaining excellent cycling infrastructure for increasing total system capacity. A 21st century transport system must provide for safe and pleasant cycling as well as excellent public transport as these both enhance choices and ensure a more efficient use of the transport network.

Para 74 needs to be amended to clarify that regions are encouraged to develop regional cycle networks and acknowledge that easy to access bicycle hire and excellent separated cycle networks is an attraction for tourists.

Page 15

Para 75 needs to be amended to note the vital contribution of active and public transport in providing choice at reasonable cost to enable transport users to access employment, education and social opportunities. This is particularly important in an ageing society but is also important for younger age cohorts to have choice. A significant proportion of New Zealanders choose not to drive as well as those who cannot because of illness or disability.

Para 78 should be amended to begin as follows:

> *Cycling is an efficient way to get around a city or town and can cover quite long distances relatively quickly*. *Cargo bikes, and cycle trailers make bikes viable for carrying a range of quite large loads easily*.

Cycling can provide a viable alternative for most journeys around a city and even for multipurpose trips. It is not uncommon for commuter cyclists to travel 10-15 km one way.

Para 79 needs to be amended to remove the emphasis on the dangers of cycling. Instead, it is important to address the perception of risk which is a key deterrent for the approximately 60% of non-cyclists who would like to cycle. We recommend the following wording:

> *The health benefits of cycling are widely acknowledged to far outweigh the risks. The perception of danger deters many who would like to take up cycling. Better education and promotion along with well developed and implemented cycling infrastructure can allow cycling to fulfil its transport potential and health benefits.*

Para 80 needs to be amended to acknowledge the role of cycling networks in reducing congestion. It should also note that integrated cycling and public transport networks can be a cost effective way to alleviate roading congestion. The bullet points in para 80a need to be amended by removing the qualifications (i.e. remove "where this can be achieved at reasonable cost" as these qualifications presumably apply to all other investments (but are not mentioned elsewhere where those other investments (e.g. RONS, state highways, local roads) are outlined. Similarly, the phrase *including impact on general traffic capacity* in the first bullet point of paragraph 80a should be removed. Where carriageway widths cannot be widened to safely meet the needs of all road users the existing widths must be allocated to achieve safety and public good outcomes. Providing better cycling infrastructure can generally be the most cost effective means to reduce congestion in urban settings by encouraging mode shift. Moreover, a focus on 'general traffic capacity' may not be relevant. In Wellington, for example, walking and cycling infrastructure on the water front greatly increases the capacity to move people around the central city, but doesn't increase "traffic capacity" – i.e. capacity for motorised vehicles. New York, San Francisco, London, Portland and many other cities worldwide have found that increasing road space allocated to cycling (decreasing the capacity of the roads to carry private motor vehicles) has freed up car traffic for a range of reasons.[15]

Page 16

Para 81 and following paras are supported and indeed, as noted above, resilience should be explicitly mentioned as the first of five foci that we recommend for the draft GPS 2015. The significant contribution that cycling provides to the reliability and resiliency of transport systems should be noted.

Page 17

Paras 89a and 89b do not adequately address the poor safety statistics for cycling. The high rate of serious injury and fatality crashes involving cyclists while being passed unsafely by motorised vehicle drivers or merely unnoticed by drivers must be addressed. Cyclist fatalities resulting from vehicle crashes occur in all parts of the roading network from urban Auckland to suburban or rural roads. NZTA reports that less than a third of car/cycle accidents are the fault of people on bicycles. More effective enforcement is required to prevent unsafe overtaking. Legislation is needed which makes clear to all that reckless passing or endangering more vulnerable road users has consequences.

[15] http://www.wired.com/2014/06/wuwt-traffic-induced-demand/
http://thei81challengeblog.org/archive/case-studies-san-francisco-replaces-central-freeway-with-a-boulevard/
http://thisbigcity.net/a-new-movement-for-the-new-city-reallocating-space-away-from-the-car/

Enforcement must be greatly increased to change behaviour which costs people's lives and the country's resources.

Page 18

CAN finds it very surprising that there is no recognition in this section of the role played by both active and public transport in reducing environmental impacts of land transport. Accordingly we recommend a new paragraph 90 with subsequent renumbering. The new paragraph should include the following wording (or similar):

> *Motorised transport and its infrastructure have had and continue to have widespread negative impacts on both the natural environment and on human communities. Pollution of water, air and land go far beyond the roads and vehicles themselves. Severance, noise and loss of land to roads and parking have indelibly moulded communities in negative ways. Reducing the reliance on motorised transport through better planning, increased opportunities for walking, cycling, public transport and by carrying out commerce electronically are all priorities. For the economy to grow and for our communities to attract the best and brightest from around the world to a clean green New Zealand, the emphasis will be on transport which genuinely achieves these goals.*

Page 19

Para 97 should include information about all sources of income or revenue.

Page 23

Table 3 needs to make it clear that all improvements must benefit all road users. Too often the needs of those not in motorised vehicles are neglected or overlooked by both policy and implementation. Including it here is vital to make clear that the transport system supports all modes. This applies equally whether it is motorways, state highways or local roads. In addition, clarification is needed of the following:

- The nature of 'suburban routes' and 'cycle networks in main urban areas'
- The term 'Main urban area'
- The term 'cycle lane kilometres' (does this refer to distances travelled or to infrastructure provided?)
- The nature of infrastructure that will qualify. Also, it needs to be noted that cycling is more than merely a promotional activity

Page 32

In Table 4 the allocation of at most $390 million to be spent on both walking and cycling over 10 years fails to achieve the stated goals of the draft GPS 2015. Instead, the government needs to ensure that active transport and in particular cycling (given that it allows offers a mode of transport for longer distances than walking) is a genuine transport mode choice. This will require far higher levels of funding, allowing some catch-up after decades of neglect and inequitable funding and supporting high quality infrastructure which

overcomes the negative safety perceptions which continue to force people into their cars even when other options are preferable.

Conclusion

CAN is very disappointed that the draft GPS allocates a paltry amount of funding to active transport (approximately $20 million out of total budget of **$3.5 billion** per year). A significant increase in investment - to at least 10% of the budget - is required. In addition, territorial authorities need to be incentivised to build cycling infrastructure so a 25% local contribution should be required. The government's policy of investing in model walking and cycling communities has supported the development of improved knowledge of how to provide more effectively for these modes. It is now a priority to ensure that the lessons learned can be rolled out to other communities and to allow these modes to play their proper role in ensuring that New Zealand has an effective, efficient, and safe land transport system that is in the public interest and resilient.

Yours sincerely

Christine Cheyne
CAN Submissions Co-ordinator

cc: CAN Secretary, CAN Chair, CAN Project Manager