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NETWORK**
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Submission on draft GPS on Land Transport 2021

Cycling Action Network (CAN) is the national umbrella organisation for all people who bike, with an emphasis on advocating for everyday utility and commuting cycling, as well as cycle tourism. We note around 1.5 million people in NZ ride bikes. The vision of CAN is “more people on bikes more often”

CAN welcomes the opportunity to make a submission on the draft Government Policy Statement 2021 (GPS). CAN notes, however, that consultation on the draft GPS took place at a time of unprecedented social and economic disruption. The full consequences of this are not known. It is clear that a return to ‘business as usual’ may not be possible, even if it is desired. Commentators have noted that the way in which people in Aotearoa New Zealand adapted to different ways of living and working during the Level 3 and 4 Alerts shows that people can also modify their behaviour in response to challenges and crises, in particular the climate crisis.¹

During the Covid-19 lockdown the government moved to stimulate economic activity by asking the Infrastructure Industry Reference Group to collate proposals for ‘shovel ready’ infrastructure projects that are ready to start as soon as the construction industry restarts. Earlier in 2021 the government announced a \$12 billion New Zealand Upgrade Programme which builds on existing Provincial Growth Fund infrastructure investments. Collectively, these investments are a massive commitment to new infrastructure. **CAN’s concern is that, notwithstanding some public transport initiatives, these will further entrench the dominance of motor vehicles in the land transport system, and exacerbate the marginalisation of walking and cycling.**

¹See, for example. White, I. (2020). *The problem with the ‘shovel ready’ strategy for post-Covid-19 rebuild*. The Spinoff. <https://thespinoff.co.nz/politics/14-04-2020/the-problem-with-the-shovel-ready-strategy-for-post-covid-19-rebuild/>

Overview

CAN **agrees** that the purpose of the transport system is to improve people's well-being, and the liveability of places (**para. 1**). However, the investment proposals in the draft GPS appear to place considerable weight on New Zealand's economic growth and, as such, will lead to under-emphasis on social, cultural and environmental well-being.

CAN acknowledges that the Labour-NZ First Coalition government has introduced many new initiatives that recognise that a broad-based approach to well-being required, most notably the Well-being Budget of 2019. However, **there is still inadequate recognition and accounting for the costs of the social and environmental impacts of transport**. As a result, the proposed funding levels in the activity classes will not significantly progress the strategic priorities, particularly the new ones, which CAN welcomes, of Better Travel Options and Climate Change.

Proposed investments are oriented towards efficiency of road transport for people and freight but do not ensure equitable access for people who cannot or choose not to drive in private vehicles. The funding levels for the activity classes in the draft GPS will further entrench our reliance on road transport and the marginalisation of active transport.

Without a more comprehensive shift away from a motor vehicle-centric land transport system, New Zealand's longer term environmental goals (in particular, its commitments under the Paris Agreement to reduce greenhouse gas emissions) will fail.

The level of funding proposed for walking and cycling in the draft GPS does not adequately support the overarching purpose of improved social, cultural and environmental well-being, and improved liveability of places. Throughout the GPS there needs to be a far more integrated approach to achieving well-being. Without a much greater level of funding the GPS will not ensure that transport investment goes in the overall strategic direction sought, much less result in the necessary step change. The GPS published in 2021 needs to be a document not just for 2021 and the following two years, but a foundation for a genuinely integrated approach to well-being for the 21st century.

Building on the key point made above, that an integrated approach is needed to well-being, which is a recurring theme in our submission, CAN **recommends** that the Climate Change Commission and the Ministry for the Environment should be added to the list of agencies in **para. 2**, especially given the greater emphasis given to climate change in the transition from the GPS 2018 to the GPS 2021.

Strategic Direction

CAN supports the four strategic priorities (**para. 6**) and the focus on mode neutrality (**para. 8**). However, these need to be given much greater weight in the draft GPS. The terminology used in **para. 11** ('take into account') is much weaker than 'give effect to'. **CAN recommends that stronger wording is used to ensure that the four strategic priorities are given effect.**

Mode neutrality became a principle in land transport funding with the GPS 2018, as a means of ensuring that alternatives to road (vehicular) transport (in particular, rail) were able to be on the same footing as roading when funding was being allocated. It is assumed that as a result of having more funding directed to alternatives to road transport, there would be a mode shift to public transport, active transport and rail would. However, while this is now happening in some pockets, alternatives are under-resourced and under-utilised. In the UK, mode neutrality had been proposed by the Eddington Transport Study undertaken for the UK government in 2006 but it quickly became clear that the institutional legacy of many years of prioritising road building meant the goal of mode neutrality was unattainable.² Therefore, it was recognised that alternative modes needed preferential treatment. This is certainly the case for alternative modes in New Zealand. Hence, equitable funding for active transport in New Zealand means that investment in the activity class for improvements to walking and cycling needs to be significantly increased.

CAN understands that, in addition to these strategic priorities, new investment in the draft GPS will be significantly influenced by four specific government commitments: (1) Auckland Transport Alignment Project (ATAP); (2) Let's Get Wellington Moving (LGWM); (3) Road to Zero and (4) implementation of the New Zealand Rail Plan (para. 12). CAN supports the Rail Plan and the inclusion of rail in the NLTP from 2021. CAN supports the intent of LGWM to move more people in fewer vehicles. As well as making possible much more co-ordination of land transport planning for road and rail, rail is recognised as having an important positive effect on active transport modes of reduced numbers of heavy motor vehicles on our roads and streets. With the other three commitments, CAN requests that rigorous analysis be undertaken at the earliest opportunity to determine and/or reassess the impacts on walking and cycling.

²Parkhurst, G., & Dudley, G. (2008). Roads and traffic: from 'predict and provide' to 'making best use'. In I. Docherty & J. Shaw (Eds.), *Traffic jam: Ten years of 'sustainable' transport in the UK* (pp. 51-74). Policy Press. <https://doi.org/10.1332/policypress/9781847420732.003.0003>

CAN welcomes the updating of the strategic priorities of Climate Change and Safety to reflect policy work that has taken place since GPS 2018 was published (**para. 17**) and the specific focus on Better Travel Options and Improving Freight Connections. Likewise CAN agrees that 'Value for money' is a principle that applies to all investments, rather than a strategic priority that could change with a change of government, or change of government priorities. In our submission on the 2018 draft GPS, CAN expressed concern at how 'Value for money' was being achieved. We wish to reiterate our comment in that previous submission that investment in roads facilitates and encourages motor vehicle use. This does not serve the Statement's stated objective of value for money. Cycling has been clearly shown to offer **better value** for money both in capital and maintenance terms. **More must be done to shift short (<5km) trips from car to bicycle.**

CAN notes the acknowledgement in **para. 30** of the importance of local government engagement with communities in their long-term planning. Unfortunately, both central and local government do not fully involve community groups with expertise in planning for walking and cycling. Often, these groups are marginalised even in stakeholder processes that are oriented towards building business cases for active transport investment. Walking and cycling groups are even more marginalised in regional transport committee memberships. This has implications for Regional Land Transport Plans. **Until long-term planning processes in local government, and transport planning processes more generally, are more inclusive of representatives of walking and cycling community organisations, plans are likely to continue to marginalise these modes, or have significant information gaps.**

CAN supports any measures to have more integration of land use (in particular housing and urban development) and transport. It is to be hoped that the foreshadowed closer working relationship between the Ministry of Transport, Waka Kotahi and the Ministry of Housing and Urban Development (HUD) will result in improved integration. However, CAN considers that much closer engagement is also specifically needed between The Ministry, Waka Kotahi and the Ministry for the Environment, given the Waka Kotahi's responsibilities for policy development in relation to, and oversight of council responsibilities under, the Resource Management Act 1991, including spatial planning. This is recognised in para. 41. As argued by the Environmental Defence Society, procedural alignment is needed between regulatory and non-regulatory tools (such as land use regulation and infrastructure funding) especially in the context of rapid urban growth. It is possible for connections "to be made earlier in the policy and development cycle for land use planning under the RMA and the associated planning and funding of core infrastructure under the Local Government Act and Land Transport Management Act".³

³Severinsen, G., & Peart, R. (2019). *Reform of the Resource Management System. The Next Generation Synthesis Report and Next Steps*. <https://www.eds.org.nz/our-work/rm-reform-project/> p. 17.

Section 2.1 Strategic priorities for GPS 2021

How the land transport system improves well-being and liveability

As noted above, CAN supports the four strategic priorities and the Transport Outcomes Framework. CAN welcomes the government's commitment to address climate change and its recognition of the need for investment decisions in the transport sector that will help New Zealand towards that goal (**para. 52**). Investment in walking and cycling will contribute to the outcomes of Economic Prosperity in the Strategic Outcomes Framework and Environmental Sustainability, as well as the new Strategic Direction of Climate Change.

What is not clear in the draft GPS is how there will be a step change towards the strategic priorities and the desired strategic outcomes without massive improvement of public transport, rail, walking and cycling. In particular, the necessary massive improvement in walking and cycling will not be achieved with the draft GPS's proposed level of investment in these modes.

Supporting regions

CAN supports the draft GPS's emphasis on supporting regions. Investment in walking and cycling has multiple regional benefits including employment creation in construction and new recreational and tourism opportunities associated with walking and biking, more cost-effective transport options for residents, improved road safety, improved health and improved quality of life. **Investment in the walking and cycling improvements activity class needs to be significantly increased.** Experience of CAN members who participate in stakeholder engagement processes (e.g. investment logic mapping) as part of Waka Kotahi's business case development routinely experience being told there is insufficient funding for walking and cycling projects. The percentage of the population that would like to bike or walk for recreation and transport on urban streets and rural roads is much greater than the percentage that actually does walk and bike. This is very clear from the very visible increase in the number of people (including young children) who biked and walked during the Covid-19 lockdown. [<https://www.tvnz.co.nz/one-news/new-zealand/big-biking-boom-kiwis-turn-other-modes-travel-and-fun-while-in-lockdown>].⁴

Previous investment in walking and cycling is undermined because of critical gaps that remain in urban cycling networks. Injuries and fatalities occur to cyclists in crashes on state highways and rural roads.

4 <https://www.stuff.co.nz/opinion/121119471/what-ive-learnt-from-the-covid19-lockdown>

Section 2.2 Strategic Priority: Safety

CAN supports this strategic priority but it is under-developed in this section and throughout the GPS. We have concerns about the way safety and health are addressed throughout the GPS. Although the primary health outcome is healthy and safe people, the primary focus of this priority is to “develop a transport system that advances New Zealand’s vision that no-one is killed or seriously injured”. The link between active transport and health also needs to be recognised in **para. 57** (or it needs to be addressed appropriately in another part of the GPS if it is to be decoupled from safety and deemphasised in **para 57**). As we point out elsewhere in our submission, the draft GPS has not adequately integrated health with transport. The co-benefits of active transport for health are only recognised fleetingly. The statement in **para. 57** “New Zealand roads will be made substantially safer” is not followed through with clear policy and funding commitments that demonstrate how roads will be made safer for people who walk and bike.

CAN welcomes the focus on inclusive access in **para. 58** and the acknowledgement that the lack of safe infrastructure has reduced people’s access to opportunities. **The discourse used here understates the serious implications of lack of safe infrastructure.** The reference to reluctance to travel by foot, bike or micro-mobility options potentially implies that people have choices. But many people cannot drive due to health/disability and/or economic factors. These people still have to walk or bike, even if they are reluctant to and do not feel safe, in order to get to work and essential services (e.g. shopping) and for meeting for social reasons. Or they remain isolated and do not have access to employment or essential services. Biking and walking is not about having additional choice for some people; it is their only transport option. For others, it may open up additional recreation choices but for a GPS that is focused on transport, this paragraph needs to be much more focused on meeting transport needs.

Safety for people who walk or ride bikes will require significant adjustments in the behaviour of people who drive (including the propensity of people to drive). Under the Covid-19 Level 4 restrictions it was strikingly clear that people felt safe to ride bikes and enjoyed walking and riding bikes because of the lack of vehicles on streets. Of course, CAN understands that such severe restrictions on vehicle use are not able to continue outside of a regional or national crisis, but the lessons learned from this must be applied where they can. **Clearly, for the safety of people who ride bikes, the number and speed of vehicles must be addressed.**

Sadly, there are malicious acts by drivers which cyclists are particularly susceptible to (**para. 58**). The reasons for this must be addressed through public policy. First and foremost, cycling must be ‘normalised’ as a mode of transport. With availability of e-bikes, increased

numbers of people are using this type of bike for transport (as well as recreation).

However, without having better infrastructure that accommodates people on bikes, normalisation cannot be achieved. Without the significant increase in the funding levels for the walking and cycling improvements activity class, the land transport system and our roading networks will remain motor vehicle-centric.

Most importantly, it needs to be noted in para. 58 that lack of safety for people on bikes is mostly not the result of “malicious” acts by drivers but because of the lack of suitable infrastructure to accommodate walking and biking, and inadequate driver education. Use of the ‘malicious’ underemphasises and potentially excuses carelessness and poor judgment by road users as causes of road deaths and injuries.

The GPS must ensure that funding in the walking and cycling improvements activity class will support campaigns to address cell phone use while driving and other causes of driver distraction. However, these campaigns must be reinforced by raising the priority of police enforcement of cell phone use by police.

Environmental sustainability should be listed in **para. 58** as a co-benefit of this strategic priority. Any increase in the number of people commuting by active transport modes as a result of safety improvements, rather than using fossil fueled vehicles (especially with only one occupant), contributes to reduced road transport emissions which is needed for meeting our Paris Agreement commitments.

In summary, this section of the GPS needs to have more direct focus on safety for people who walk and bike. The statement “supporting alternatives to key routes and modes will improve the resilience of the network. Safer integrated designs can improve resilience of assets, which in turn enhances communities’ and agencies’ response and recovery to unexpected events.” is opaque (**para. 58**) and the paragraph gives no indication that safety for people who walk and bike is being prioritised and adequately addressed.

The co-benefits of active transport for health need to be explicitly recognised as this provides further justification for increased levels of funding in the walking and cycling improvements activity class. Physical inactivity contributes to a rapidly-growing taxpayer burden of non-communicable diseases such as diabetes, cardio-vascular disease and some cancers. Encouragement of active travel including cycling, walking and public transport is known to increase public health outcomes and reduce healthcare expenditure.

Section 2.3 Strategic Priority: Better Travel Options

CAN strongly supports this new strategic priority and the future focus. Reducing road transport's contribution to New Zealand's greenhouse gas emissions is a key requirement for meeting Paris Agreement commitments. It is clear that the goal of 64,000 electric vehicles by 2021 will not be achieved. (We note that NZ's most popular EV, the e-bikes, is excluded from this metric.) Therefore, short-term and long-term travel demand management is needed to reduce use of vehicles powered by fossil fuels. **Biking and walking are key travel options for both environmental sustainability and health. This needs to be much more explicitly recognised in the funding levels for the walking and cycling improvements activity class.**

The broader social benefits of active transport cannot be overstated. These benefits include reduction in demand for health services through fitness and improved air quality, workplace productivity through worker fitness, reduced absenteeism, and health and readiness to learn for school students.

CAN supports the work by Waka Kotahi on mode shift (in particular, the 2019 document *Keeping cities moving*) but wants this work ramped up and broadened **to include all urban areas of more than 25,000 people.** There is significant scope for active transport and shared transport to be increased throughout New Zealand. It would appear that the focus on just a few urban areas (Auckland, Tauranga, Hamilton, Wellington, Christchurch and Queenstown) is because of growth pressures, but all areas of New Zealand are car-dependent and are missing out on the environmental (especially reduced greenhouse gas emissions), economic and social benefits of mode shift towards active transport. If capacity and resources are an issue in not extending mode shift to areas where there are not growth pressures, then that is a further reason for increasing funding levels in the walking and cycling improvements and public transport services and infrastructure activity classes.

CAN supports the indicators in para. 64 but would like it to be clear in the GPS that the Ministry, Waka Kotahi and the land transport system should have an active role in contributing to New Zealand's climate change commitments through reducing road transport emissions. This relates to our earlier point that the Climate Change Commission and the Ministry for the Environment should be added to the list of agencies in para. 2 of the GPS.

Section 2.4 Improving Freight Connections

CAN welcomes the recognition in the draft GPS that “Increasing movements of freight by rail and coastal shipping over time, which are safer than road travel, will reduce the safety risks of travel” (para. 66). **Our key concern is the need for a much more explicit timeframe – and one that treats this mode shift as a matter of priority.**

The number and size of freight vehicles on state highways and local roads (both urban and rural) is a major impediment to increased uptake of active transport, especially in the absence of safe infrastructure. CAN acknowledges the considerable efforts made by some individuals and organisations in the road freight sector to increase awareness of people on bikes. An example is the NZTA-funded Share the Road programme which is delivered by CAN. But the inadequate road infrastructure means that despite some individual professional drivers’ best efforts, people on bikes remain at risk around freight vehicles. The increased number and size of freight vehicles was explicitly promoted by previous government policy and yet infrastructure was not improved to ensure the safety of people who walk and bike.

Improvements to infrastructure on key freight routes (which often include urban streets) must be given a high priority in the post-Covid-19 new infrastructure spending and should be also be resourced through increased funding in the walking and cycling improvements activity class. The outcomes listed on page 21 for this strategic priority and the indicators for measurement of progress (para. 67-68) should focus on how this strategic priority will contribute to safety of active transport modes. For example, an additional measure to deliver the outcomes such as “Improve safety for active transport users though investing in infrastructure to ensure their safety on freight routes in urban and rural areas.”

Environmental sustainability is recognised in para. 66 as a co-benefit of this strategic priority but is not listed in the graphic above at the start of this section. It needs to be included.

Section 2.5 Strategic Priority: Climate Change

As indicated elsewhere in our submission, **CAN welcomes the new strategic direction of Climate Change.** There is substantial literature on the importance of active transport (and new micro-mobility technologies) for achieving a transformation to the government’s goals of a low carbon transport system aligned with its national and international commitments.

CAN is puzzled as to why economic prosperity is not listed in the co-benefits of this strategic priority and in the graphic (**para 69**). **The GPS must acknowledge the considerable economic benefits to New Zealand of a a low carbon transport system.** Already, many export industries (including food, wine and tourism – including our national carrier) and local businesses and public sector organisations (e.g. tertiary education organisations and local government) recognise the importance of their brand of lowering their carbon footprint. They need the land transport system to support their carbon management plans through providing high quality active and active transport infrastructure. Central government itself needs to be achieving zero net carbon and showing leadership. The current funding levels in the GPS are clearly not aligned with this strategic priority.

Given the work of the Climate Change Commission referenced in **para. 75**, we reiterate the recommendation in that CAN recommends that the Climate Change Commission and the Ministry for the Environment should be added to the list of agencies in **para. 2** of the Overview section, reflecting the greater emphasis given to climate change in the transition from the GPS 2018 to the GPS 2021.

The mechanisms proposed on page 23 by which the GPS will achieve the strategic outcomes need to be considerably strengthened. **CAN wishes priority to be given to making the second mechanism “Investment decision making that supports national commitments on emissions reduction” a much stronger driver of all land transport policy and planning including this GPS.** Investment decisions must go beyond simply “supporting” a rapid transition to a low carbon transport system but must promote and even accelerate that transition. **Such decisions could include financial support for bicycle purchases if those bikes are to be used for commuting. The UK’s Bike2Work scheme is an example which could be emulated in NZ.** (<https://www.bike2workscheme.co.uk/>)

It cannot be overstated how challenging it will be to achieve this strategic priority especially in the immediate aftermath of the global pandemic in 2020, which has resulted in the collapse of the price of US crude oil prices for oil is at a record low, as a result of imbalances in supply and demand.

Section 2.6 Indicators for how progress will be measured

CAN supports the indicators proposed in Table 1 (**para. 80**) but wishes to emphasise the need for much improved data collection on the experiences of people who bike and walk, as well as the concerns of those who do not.

Section 3.1 Funding land transport

CAN welcomes and supports the increase in walk/cycle funding for 2021/22 to 2023/24. However, we question the government's depth of commitment when projected funds drop back from 2024/25 to the same upper and lower levels as the existing GPS. This reduction is particularly disappointing when other categories, state highway and local roads maintenance for example, see increases from 2024/25. We request that a walking and cycling maintenance category be introduced as we see many worthy new projects being built that do not get maintained over time.

Already, Greater Auckland has pointed out that it is not clear is that sufficient funds are coming into the National Land Transport Fund from fuel taxes and road user charges to pay for the proposed investment levels in the activity classes, prior to Covid-19. This will be exacerbated by the anticipated economic recession.

Overall, there needs to be a much improved allocation to the walking and cycling improvements and public transport services and infrastructure activity classes that reflects the health and environmental benefits of these modes. There is serious under-investment in these activity classes compared to other activity classes, especially when the investment in transport infrastructure through the NZ Upgrade Programme is taken into account.

With any changes to the overall level of funds available for investment through this GPS as a result of economic recession and Covid-19 recovery, there needs to be a very inclusive process for working through the implications. Priority should be increased investment in the walking and cycling improvements, public transport services, and infrastructure activity classes.

CAN has concerns that the business case methodology used for developing applications for funding, and cautiously welcomes exploration of new investment models with different funding and financing applications (**para. 85-87**). However, both these and the existing business case methodology need to avoid the crude measures of benefits of active transport. Some of our member groups have participated in investment logic mapping exercises (led by Waka Kotahi staff and contractors) for active transport where decisions are made based on very inadequate quantitative and qualitative data.

Section 3.2 Principles for investing

CAN supports the principles and reiterates that GPS investment across all activity classes needs to be clearly aligned with the goal of reducing transport emissions.

CAN supports much greater focus on travel demand management. This allows the most cost-effective use of public funds for land transport.

Section 3.3 Dedicated funding for delivering transport priorities

In managing the long-term sustainability of its transport investment programme, the Ministry and Waka Kotahi should also consider climate change mitigation and adaptation and environmental and health benefits along with fiscal adequacy, and resilience. Climate change is a long-term trend which needs to be explicitly recognised.

Section 3.4 Activity class framework

CAN supports the new activity classes for public transport and Road to Zero. But CAN is concerned about the low level of funding allocated to the walking and cycling improvements activity class and the small proportion of overall funding allocation to this activity class when there is clearly a large need and demand.

The media release at the time of the release of the draft GPS 2021 referred to the new shared pathway across the Manawatū River, which is a project that was designed and completed under the Labour-NZ First Coalition government. This single project was \$18 million. It has proved to be a popular piece of new infrastructure for walking and cycling, demonstrating that quality infrastructure will increase uptake of walking and biking for transport and recreation (both with co-benefits to health) and improve liveability. However, it has also highlighted the need to address gaps in the wider roading network which deter walking and biking and which reflect a poor level of safety for people who walk and bike.

CAN understands that the intention of the GPS activity class framework is that, with big new capital projects on state highways (such as the Manawatū Gorge replacement), walking and cycling infrastructure is to be funded from the state highway activity class because the cost of any new transport solution on state highways should automatically include a provision for a multi-modal approach. However, local councils and community groups had to work strenuously to persuade Waka Kotahi to include provision for biking in the design. It's

exhausting. And if this same logic applies to “local roads” (that is, council-led roading projects) there will be similar barriers to overcome to ensure adequate provision for safe walking and cycling. **CAN seeks more explicit references in the GPS to the requirement for all roading activity classes to ensure that projects are fully multi-modal.**

Miscellaneous

The draft has a summary of key policy documents in Appendix 3 whereas the GPS 2018 put the very welcome broad policy context up front in section 1.2. We would suggest that this brief outline be updated and re-introduced with reference back to Appendix 3. Including this summary early in the GPS 2021 would highlight the interconnectivity of the policy framework, which is easy to overlook if relegated to an appendix. It is too easy to think of transport in a silo, and the relationship between active transport and public health is a crucial one.

Conclusion

CAN commends the explicit recognition in the draft GPS of the need for the land transport system to support New Zealand’s international climate change obligations and, in particular, the reduction of road transport emissions. Investment in walking and cycling will contribute to the outcomes of Economic Prosperity and Environmental Sustainability in the Strategic Outcomes Framework, as well as the Strategic Direction of Climate Change.

However, **CAN is concerned that the health co-benefits of biking and walking are not sufficiently recognised in the draft GPS** even though a Strategic Outcome is **Healthy** and safe people. CAN is also concerned that the GPS is not aligned with Waka Kotahi’s Innovating Streets for People pilot. This is fundamentally about reconsidering how street space is allocated, creating more people-friendly spaces in our towns and cities, and re-imagining public space.

Value for money from investment in walking and cycling will not be fully realised while these modes remained marginalised in the land transport system and underfunded in the draft GPS. Rebalancing investment in favour of these modes will strengthen the ability of the GPS to deliver the Strategic Outcomes and to deliver a land transport system that is fit for purpose and fit for the future.

This feedback is submitted in the interest of seeing cycling fulfill its potential to support the well-being (especially in the context of climate change) of all New Zealanders.