

28 April 2020

Ministry of Transport  
[gps@transport.govt.nz](mailto:gps@transport.govt.nz)

## Christchurch City Council submission on the Draft Government Policy Statement on Land Transport 2021

1. Christchurch City Council (“Council”) welcome the opportunity to make a submission on the Draft Government Policy Statement on Land Transport (Draft GPS) 2021.

### *Summary of key points*

2. Council is broadly supportive of the overarching direction in Draft GPS 2021, with its focus on access, environment and safety. In particular, Council has set a target of zero emissions by 2045, and welcomes the focus in Draft GPS 2021 on emissions reductions and mitigating the impact of climate change. Council is also firmly committed to reducing the number of deaths and serious injuries on Christchurch roads, and strongly supports the vision in *Road to Zero* as well as the interim national target of a 40% reduction in deaths and serious injuries by 2030.
3. Council also considers there are a number of key components of Draft GPS 2021 which require amendment, if the Government and its primary funding partners are to successfully implement the ambitious programme of change signalled. The need to clearly focus priorities and transparently target funding has become even greater as New Zealand looks to recover from the impact of the Covid-19 global emergency.
4. The key points in this submission are:
  - A. GPS 2021 needs to provide a greater sense of how funding will be targeted.
  - B. Government and Greater Christchurch councils should collaborate to include the public transport futures investment programme as a core government commitment in the final GPS 2021.
  - C. Sustainable Urban Form should have a dedicated focus.
  - D. The strategic priority “Better Travel Options” should be amended to “Sustainable Transport Options”.
  - E. “Improving Freight Connections” should not be a stand-alone strategic priority.
  - F. Police road safety activities should be a separate activity class and the “Safety” strategic priority should have stronger links to other co-benefits.
  - G. GPS 2021 should expressly reference travel demand management initiatives in one or more activity classes.
  - H. Metro rail should form a separate activity class in GPS 2021.
  - I. The GPS should ensure that cost-benefit assessments do not permit disproportionate weight to be given to monetised benefits.

- J. The GPS should ensure that any provision to increase capacity for additional single occupant vehicles is fully balanced against climate change targets and the extent to which transport contributes to national emissions.
5. Recommendations are provided below for each of these key points.
6. A table of additional recommendations, targeted to particular paragraphs of the GPS, is appended.

## Key recommendations

### A. GPS 2021 needs to provide a greater sense of how funding will be targeted

7. Draft GPS 2021 sets an ambitious agenda. Council supports the approach of drawing multiple linkages between the strategic priorities, outcomes and co-benefits sought, and enabling major investment projects to receive funding from more than one activity class.
8. Council are concerned, however, that Draft GPS 2021 has lost the clearly articulated focus of GPS 2018 on the vital components of a sustainable transport network. These include sustainable transport choices, mode shift, integrated transport and land use planning, and travel demand management.
9. The objectives in GPS 2018 have been in force for less than two years, and have not yet been properly implemented. Some of the new strategic priorities in Draft GPS 2021 do not appear to build on the objectives of GPS 2018. This risks creating uncertainty in the transport sector, particularly with respect to investment that has long lead times and high costs.
10. Council considers that GPS 2021 needs to identify the highest priority activity types, to avoid the risk of oversubscription of activity classes – a risk that is evidenced by the withdrawal of the Targeted Enhanced Funding Assistance Rate in 2019 due to insufficient targeting. The need for clearly targeted expenditure has become even more vital in light of the anticipated impact of Covid-19. Without a highly disciplined approach, it will be difficult for Waka Kotahi to target the Government’s highest priority initiatives.
11. Clarity is also required regarding the relevance of government documents other than GPS 2021 to the investment decision making process. In particular, Draft GPS 2021 refers to the Mode Shift Plan underway for Greater Christchurch, and indicates it will be implemented, but does not clearly outline the relevance of such plans to investment decisions. At paragraph 140, Draft GPS 2021 refers to increased investment in “Public transport services and infrastructure, to help to make towns and cities more liveable through achieving the Government’s ambitions for mode shift.” There is a need for greater transparency regarding the Government’s targets and intentions to use mode shift plans as an investment tool.
12. Similarly, the extent to which *Arakati* and Waka Kotahi’s *Sustainability Strategy and Action Plan* will inform the investment decision making process is unclear. The Statement of Ministerial Expectations also indicates that Waka Kotahi will have a greater role in long-term, integrated planning but does not provide any detail on what this may look like and how it will impact on council planning processes.
13. Clarity should be provided on these matters because they will have a fundamental impact on local government planning and investment.
14. Finally, GPS 2021 needs to acknowledge the importance of making sure robust data and analytics are in place to support the ambitious programme of change signalled. A number of significant gaps currently exist – for example, accidents that do not get reported, and journeys that do not occur, enabling social and economic exchange, due to lack of access. Implementation

of the Ministry of Transport's Domain Plan should therefore be a specific focus in GPS 2021. As a starting point, data relating to GPS 2021 progress indicators should be made available at both a district and regional level.

#### *Recommendations*

15. Council recommends that the strategic direction in GPS 2021 is refined to provide greater guidance on how funding should be targeted.
16. Council recommends that GPS 2021 explicitly outline the highest priority interventions.
17. Council recommends that the highest priority interventions include safer speeds and public transport improvements.
18. Council recommends that GPS 2021 clarify the role and status of national and regional mode shift plans and *Arataki* in the investment decision making process, as well as how Waka Kotahi will have a greater role in long-term, integrated planning for the sector.
19. Council recommends GPS 2021 recognise the importance of robust data and analytics to support the ambitious programme of change signalled, and take steps to ensure that the data which investment decisions are based on is complete (for example, through implementation of the Ministry of Transport's Domain Plan).

#### **B. Government and Greater Christchurch councils should collaborate to include the public transport futures investment programme as a core government commitment in the final GPS 2021.**

20. Greater Christchurch currently has a population nearing half a million residents, with the population expected to grow to about 640,000 by 2048. Just under 80% of the Canterbury regional population and about 40% of the South Island population live in Greater Christchurch, emphasising its importance as a strategic regional centre and the primary economic hub of the South Island. Canterbury is the fastest growing region in New Zealand outside Auckland and more population growth is projected in Greater Christchurch over the next 30 years than other high growth cities, such as Hamilton, Tauranga, Wellington and Queenstown.
21. Significant work is being undertaken by local and central government to determine what type of public transport system evolves in Greater Christchurch over the next 30 years, including options for the provision of mass rapid transit. This work highly aligns with the Better Transport Options strategic priority, and Draft GPS 2021 references the work on this transformation change at page 19, as follows:

*Waka Kotahi will take a more proactive role in accelerating mode shift by partnering with local government and other agencies to shape urban form, make shared and active modes more attractive, and influence travel demand and transport choice. This includes progressing work that is already well underway on developing a public transport system in Christchurch.*

22. A programme of investment for the 2021 long-term planning cycle is currently being prepared by Greater Christchurch partner councils and Waka Kotahi. Council considers this work will significantly contribute to the implementation of GPS 2021 in Greater Christchurch.
23. There is, however, a serious affordability issue that needs to be addressed if the desired transformation is to be achieved. This affordability issue will be exacerbated by the economic impact of COVID-19, though at the same time communities will have more need than ever of access to sustainable active and public transport options and land use planning which supports efficient network planning and liveability. Without assistance from the Government through the GPS and National Land Transport Fund (NLTF), it will be difficult to address the major barriers to

increasing uptake of public transport – for example, the current frequency and competitiveness of services.

24. If the Government wishes to pursue mode shift, sustainable transport modes need a greater level of funding – whether this is through a higher Funding Assistance Rate, a contestable fund like the Urban Cycleways Fund, or another mechanism. A preliminary indicative assessment of the likely costs is around \$60 million in years 1-3 and an additional \$50 million in years 4-10. Section 3.1 (Funding land transport) suggests that the Government will look at new ways of making optimal funding and financing decisions, but Council is concerned that the focus of this section is on local government needing to find alternative funding sources for significant projects, particularly as there is no guidance on what those funding sources might be.
25. Council also notes that there are only modest increases in walking and cycling funding in Draft GPS 2021, despite the stated commitment to mode shift and the significant changes that are occurring in urban development and the way people move on footpaths and road margins.
26. Council would welcome the opportunity to collaborate with the Government and partner councils to include the public transport futures investment programme as a government commitment in the final GPS 2021.

#### *Recommendations*

27. Council recommends that the Government and Greater Christchurch councils collaborate to include the public transport futures investment programme as a core government commitment in the final GPS 2021.
28. Council recommends a greater increase in walking and cycling funding.

#### **C. Sustainable Urban Form should have a dedicated focus**

29. Integrated transport and land use planning was a key theme in GPS 2018. Council is concerned that this strong focus in GPS 2018 has not been carried over with sufficient emphasis to Draft GPS 2021.
30. To ensure land use planning supports sustainable and efficient transport network planning, the GPS should set clear signals for investment decision making as well as for the GPS on Housing and Urban Development. To achieve this, GPS 2021 should signal clearly that urban intensification is needed to support the effective operation of metro public transport systems. At present, transport investment decisions can be heavily influenced by privately made choices about where to live which impose significant external costs and lead to inefficiencies. Draft GPS 2021 states that transport investment will be in line with the Urban Growth Agenda. The Urban Growth Agenda, through the National Policy Statement on Urban Development, identifies urban intensification as a key driver for promoting sustainable urban development.
31. In addition to the importance of intensification in metro areas along public transport corridors, GPS 2021 should expressly articulate the importance of the following factors:
  - Land use planning and consenting to promote local availability of primary needs, rather than just facilitating access to them.
  - Well-planned location of supermarkets, pharmacies, doctors, and educational facilities, so that all neighbourhoods have easy/close access to these essential businesses, rather than relying on high mobility for all people.

### *Recommendations*

32. Council recommends that sustainable urban form is dedicated focus to ensure GPS 2021 sets a clear expectation that decision makers must fully integrated transport and land use planning and investment decisions.
33. Council recommends ensuring GPS 2021 establishes clear signals for the proposed Government Policy Statement on Housing and Urban Development regarding sustainable urban form.

#### **D. The strategic priority “Better Travel Options” should be amended to “Sustainable Transport Options”**

34. Council supports the focus on access in Draft GPS 2021. Council is concerned that “Better Travel Options” places too much emphasis on mode choice as a means to an end, and would include single occupant vehicle travel. Council considers the focus should be on transport choice as a means to other desirable outcomes, such as emissions reduction, safety and amenity. Council considers that “Better Travel Options” should explicitly include sustainability. If the Government’s ambitious emissions targets are to be achieved, the link between transport choice and environmental sustainability needs to be articulated in all government policy, from strategy to delivery.
35. Council suggests terming this strategic priority, “Sustainable Transport Choices”, noting that the word “sustainable” also incorporates the idea of maintaining or improving social, cultural and economic wellbeing.
36. Council considers a number of other revisions would strengthen this strategic objective as follows:
  - The co-benefit of improving health and wellbeing through active transport should receive greater recognition in the discussion on this strategic priority.
  - Safer routes to schools and safer speeds around schools should be a priority focus to encourage active travel, as per the announcement by Hon Julie Anne Genter on 28 November 2019.

### *Recommendations*

37. Council recommends “Better Travel Options” be amended to “Sustainable Transport Options”.
38. Council recommends the statement, “Provide people with better transport options to access places for earning, learning, and participating in society” be amended to “Provide people with sustainable transport options to access places for earning, learning and participating in society”.
39. Council recommends that safer routes to schools and safer speeds around schools be a priority focus, to encourage active travel.

#### **E. “Improving Freight Connections” should not be a stand-alone strategic priority**

40. Council supports the modal optimisation of freight. In 2019, a major transport study commissioned by the South Island Regional Transport Committee Chairs Group found that rail freight is an economic way to take pressure off South Island roads. It found potential for a \$20-\$30 million investment in rail projects to save up to \$12-\$18 million annually, when wider economic impacts are considered. A copy of the study is available [here](#). The Government has been invited to take up the recommendations in this report and work with KiwiRail and local government to enable the transformation the report outlines.
41. Including rail freight and coastal shipping with the GPS is a new approach. At present, most activity classes do not have a strong connection to mode shift or freight connections. The two

dedicated activity classes which do – “rail network” and “coastal shipping” – are aimed primarily at KiwiRail and the coastal shipping sector, rather than councils.

42. Nonetheless, when councils seek funding from the NLTF they will need to demonstrate the highest alignment possible with GPS strategic priorities. Council is concerned that a priority of “Improving Freight Connections” may lead to or favour investment proposals that increase capacity and encourage Single Occupancy Vehicle travel, such as the Roads of National Significance programme has done. These programmes have resulted in significant investment being required to mitigate the negative social, environment, economic and safety downstream impacts of significant increases in the number of vehicles on our roads.
43. Council supports the role of GPS 2021 in promoting freight mode shift and improved freight connections, but considers freight mode shift and improved freight connections should be important components of a broader resilience strategic priority, rather than a standalone strategic priority. Resilience is a serious concern for councils, in terms of lifelines as well as freight routes. This approach would:
  - Allow Councils and Waka Kotahi to demonstrate high alignment to GPS strategic priorities for safety, and active and public transport initiatives, by also demonstrating resilience benefits without needing to specifically demonstrate how activities will enhance freight mode shift/connections.
  - Allow KiwiRail and the Coastal Shipping sector to apply under the rail network and coastal shipping activity classes to progress activities relating to mode shift and freight connections.
44. Council also recommends that further explanation is provided regarding sources of funding for the rail network and coastal shipping activity classes.
45. Finally, Council supports the delivery objective, “Improve the safe and efficient movement of freight and logistics planning and network optimisation.” However, given the strong emphasis in Draft GPS 2021 on co-benefits, Council considers that GPS 2021 should provide more direction as to how road controlling authorities can direct freight to use certain corridors and avoid others, particularly those routes that go past schools. This would strongly support implementation of the Safety strategic priority.

#### *Recommendations*

46. Council recommends replacing the strategic priority of “Improving Freight Connections” with “Resilient Connections” with freight mode shift and freight connections forming important components of this priority.
  47. Council recommends GPS 2021 clarify the sources of funding for the “rail network” and “coastal shipping” activity classes.
  48. Council recommends GPS 2021 provide more guidance as to how road controlling authorities can direct freight to use certain corridors and avoid others, particularly those routes that go past schools.
- F. Police road safety activities should be a separate activity class and the “Safety” strategic priority should have stronger links to other co-benefits**
49. Council supports the focus on investment to implement *Road to Zero*. Council also supports the commitment by the Government to ‘Increase access to safer modes (e.g. public transport), with initial priority in Auckland, Tauranga, Hamilton, Wellington, Christchurch and Queenstown’ (page 17). Council considers enhanced public transport investment and safer and slower urban roads are both critical safety interventions. Council also considers there is an opportunity for

road safety activities to form an important part of the proposed economic stimulus package, including interventions such as mass roll-out of speed humps and raised platforms.

50. Council is fully committed to working in partnership with central government and other partners to improve road safety. Collaboration is vital for looking at how we can most effectively deliver behaviour change campaigns, speed management and infrastructure improvements to reduce deaths and serious injuries on our roads. Council considers a greater level of funding from central government will be required to deliver on the ambitious signals in *Arataki* around behaviour change and road safety education.
51. Council supports collaboration by Police and partner organisations to implement *Road to Zero*. Council notes that Draft GPS 2021 has included road policing, automated enforcement, and road safety promotion all in the same activity class as safety infrastructure. While it can be helpful to take a holistic approach, this creates unnecessary inter-agency competition for funding, where competing agencies have quite different roles. This is particularly so when activities such as safety and red-light cameras are clearly needed/committed and should be quantified and separated out. In this respect, it is not clear what proportion of funding will be available for council safety-related programmes, once funding has been allocated to police activities, nor what is needed for activities that are already committed.
52. Council therefore recommends that, while police road safety activities should be carried out in collaboration with partners, police activities should form a separate activity class.
53. Council also considers there is a need to provide clearer links between the Safety strategic priority and other co-benefits as follows:
  - There is a missed opportunity to think about health and safety. Deaths relating to sedentary lifestyles have a high order of magnitude and active transport has an important role to play in supporting public health.
  - Land use is mentioned in road safety, but the need for land use planning to support a reduction in car dependency is not. There are significant external costs associated with increases in the use of cars, of which safety is one.
  - Crashes involving vulnerable road users (ie cyclists and pedestrians) should be a measure given that inclusive access is identified as a co-benefit.

#### *Recommendations*

54. Council recommends a particular focus on safer and slower urban roads, and that road safety interventions should form part of the proposed economic stimulus package.
55. Council recommends that police activities are included in a separate activity class.
56. Council recommends providing clearer links between the Safety strategic priority and other co-benefits, in particular the links with health and land use planning.
57. Council recommends that crashes involving vulnerable road users are also an identified measure.

**G. GPS 2021 should expressly reference travel demand management initiatives in one or more activity classes**

58. Draft GPS 2021 states at paragraph 98 that “demand management initiatives (including promotional activities) will be developed as part of transport planning and business case processes, and then funded from the most appropriate activity class”. Council supports this approach as it will enable councils and Waka Kotahi to incorporate travel demand management activities into infrastructure and service projects from the outset and to form a part of projects relating to new assets. Council also supports the signalled focus on making the most of our land transport system.
59. At the same time, it has historically been difficult to obtain funding for travel demand management. As such, Council considers that express reference to travel demand management initiatives should be made in one or more activity classes. This would send a strong and visible signal about the importance of such initiatives, which might not be as compelling if no activity classes were to expressly reference travel demand management. It would mitigate the risk that the move from a single travel demand management activity class to incorporating travel demand management in all activity classes, could lower investment and compromise outcomes. GPS 2021 needs to clearly demonstrate that travel demand management is a core strategy for achieving the strategic priorities.
60. Council also considers it would be helpful for the GPS to clarify whether demand management refers only to behavioural change or whether it encompasses all aspects of mode shift and travel demand management (both “soft” and “hard” measures).

*Recommendation*

61. Council recommends that GPS 2021 expressly reference travel demand management initiatives in one or more activity classes.
62. Council recommends that GPS 2021 clarifies whether demand management refers only to behaviour change or whether it encompasses all aspects of mode shift and travel demand management.

**H. Metro rail should form a separate activity class in GPS 2021**

63. Council agrees in principle with a mode neutral approach to funding transport investment. However, Council considers metro rail should form a separate activity class in GPS 2021 for the reasons outlined below. This approach could be reviewed for GPS 2024.
64. GPS 2018 included a separate transitional rail class focused on specific projects in Auckland and Wellington. Draft GPS 2021 establishes an activity class of “public transport infrastructure” which includes rapid transit funding (for busways and light rail infrastructure) and metro rail. Rail is not as prevalent in the South Island as it is in the North Island, and both Draft GPS 2021 and the Draft New Zealand Rail Plan make it clear that the focus of government investment in rail over the three-year term of GPS 2021 is on rail in Auckland and Wellington. Paragraph 123 of the Draft GPS also states that:

*Projects approved under the transitional rail activity class for the Auckland and Wellington metropolitan rail networks and certain approved inter-regional rail projects will now be funded through the public transport infrastructure activity class.*

65. The GPS forecasts expenditure of \$16.3 billion for the Auckland Transport Alignment Project (ATAP) from 2018 to 2028 and \$3.8 billion for Let’s Get Welly Moving (LGWM) from 2021 to 2041. However, it does not outline the immediate impact on the NLTF over the next three years, how much of this expenditure will come from new Crown funding, and how much of this

expenditure pertains to rail. It also does not clarify whether this funding includes or is in addition to the multi-billion upgrade programme announced in December 2019.

66. Council is concerned a significant amount of NLTF funding from the public transport infrastructure activity class could be required to upgrade network infrastructure in the North Island over the next three years, but this has not been made transparent. It is particularly important to be transparent about funding allocations given the potential for operational expenditure for any new rail to be high over the three-year term of this GPS, until commercially viable patronage levels are reached.
67. Ultimately, Council is concerned that this approach could impact on the ability of Greater Christchurch councils to access funding needed to both maintain public transport infrastructure and achieve the significant transformation the Government is seeking in Greater Christchurch.

#### *Recommendations*

68. Council recommends that metro rail be included as its own activity class in GPS 2021 so relevant funding allocations are transparent.
69. Council recommends Table 4 (“Investment expectations for Government Commitments to be met in NLTPs”) in section 3.5, outline the funding that will be required in the three years of GPS 2021, and the extent to which funding (both over this three year period and over the term of the investment) will come from sources other than the NLTF.

#### **I. The GPS should ensure that cost-benefit assessments do not permit disproportionate weight to be given to monetised benefits**

70. Draft GPS 2021 indicates that “the principle of efficiency within value-for-money does not necessarily mean selecting the lowest price, but rather the best possible outcome for the total cost of ownership...” (Para 92). Draft GPS 2021 also makes it clear that this includes considering monetised and non-monetised costs and benefits. Council supports this approach and notes that it is important that non-monetised benefits are included in the judgement of value for money, particularly as these can reflect broader benefits of transport investment not captured in monetised benefits, such as improved amenity and improved accessibility.
71. However, Draft GPS 2021 also suggests that cost benefit analysis will likely be used to assess total cost. Council is concerned that using the established technique of cost benefit analysis will give too much weight to monetised benefits when value is considered. There are acknowledged limitations of monetised benefits and cost benefit analysis, particularly when wellbeing and broader outcomes achieved by transport projects are considered, such as amenity and improved accessibility rather than travel time savings. Taking this into consideration, Council is concerned that an overemphasis on cost benefit analysis could lead to perverse outcomes in the same way that selecting the lowest price can.

#### *Recommendation*

72. Council recommends that paragraph 92 be amended as follows (proposed new text added in **bold**):

*The principle of efficiency within value for money when procuring goods or services does not necessarily mean selecting the lowest price but rather the best possible outcome for the total cost of ownership [or whole-of-life cost]. This includes considering the appropriate funding source and the whole life costs and benefits [both short and long-term and monetised and non-monetised]. An established technique supporting this is cost benefit analysis. **Noting that traditional cost-benefit analysis has tended to focus on monetised benefits and costs, the NZ Transport Agency will need to ensure the framework used to assess value for money includes appropriate consideration of non-monetised benefits and costs.***

**J. The GPS should ensure that any provision to increase capacity for additional single occupant vehicles is fully balanced against climate change targets and the extent to which transport contributes to national emissions**

73. Draft GPS 2021 indicates that there is still funding available for capacity increases (for example paragraph 97 notes that demand management should be considered as supplementary to any increase in road capacity) and local road and state highway improvements activity classes refer to improving capacity.
74. It is reasonable to assume that capacity increases enable and induce additional private vehicle movements and therefore Vehicle Kilometres Travelled, irrespective of the supporting measures to encourage mode shift (the overall generalised cost of travel is simply reduced making both single occupant vehicle and alternate modal travel more attractive and therefore more likely to occur).
75. Unless the uptake of zero emission vehicles (such as electric vehicles) occurs at a rate greater than the traffic induced as part of capacity increases, emissions will rise, in conflict with central and local government emission targets.
76. Any increase in capacity will inevitably lead to increases in traffic, either carbon emitting or otherwise, which will also adversely impact congestion downstream of the capacity increase and associated worsening of road safety outcomes.
77. Investment in alternative modes can provide more available capacity for single occupant vehicles by transferring single occupant vehicle trips onto more sustainable modes. In order to mitigate the likely of induced demand to fill this available capacity, either reducing this capacity, or appropriately pricing this capacity should be considered.
78. Paragraph 13 of Draft GPS 2021 states that:
- As announced in December 2019, the Crown will invest \$6.8 billion in land transport infrastructure. This will fund specific projects to speed up travel times, ease congestion and make our roads safer by taking trucks off them and moving more freight to rail. They will help further the strategic priorities of GPS 2021. This funding supplements the activity classes, which display investment from the Fund only”.*
79. Council disagrees that investment in land transport infrastructure will ease congestion in the long term without some form of pricing to manage demand. It will also make it more difficult to implement the priorities in GPS 2021. Council considers the focus of investment should be about access and providing sustainable transport choices.

*Recommendation*

80. Council recommends that the focus of investment should be about access and providing sustainable transport choices which improve social, environmental and economic outcomes for society and minimise such costs. This does not include additional capacity for single occupant vehicles.

## **Additional recommendations**

81. The table appended outlines our recommendations targeted at particular paragraphs in Draft GPS 2021.

Regards

A handwritten signature in blue ink, appearing to read "Lianne Dalziel", with a long horizontal flourish underneath.

Mayor Lianne Dalziel

**Christchurch City Council**

## Appendix: Summary of targeted recommendations

The following table outlines Council recommendations regarding amendments to specific paragraphs in Draft GPS 2021.

Paragraph, page, section	Comment	Council recommendations
Paragraph 44, page 13, section 2.1 (The Strategic Priorities for GPS 2021)	Under “Better Travel Options”, economic considerations are separated out from social, environmental and cultural wellbeing – ie “...healthy environments that improve wellbeing and economic prosperity”. This kind of messaging will risk continuing to elevate financial considerations above all other wellbeings in investment decision making.	Key messaging in GPS 2021 should refer to the four well-beings in the Local Government Act 2002 and should not separate out economic considerations from all other wellbeings.
Paragraph 45, page 13, section 2.1 (The Strategic Priorities for GPS 2021)	Under “Improving Freight Connections” there is no mention of sustainability.	Improving Freight Connections should not be a stand-alone priority. Where it is discussed, the need for sustainable freight movements should be emphasised.
Paragraph 58, page 16, section 2.2 (Strategic Priority: Safety)	Paragraph 58 states that “Safer travel includes security measures to prevent deaths and injuries from malicious acts.” It is not clear what is meant by “malicious acts”.	Council seeks that “malicious acts” are explained.
Page 17, section 2.2 (Strategic Priority: Safety)	Page 17 outlines the following delivery focus, “Shape land use, urban form and street design in a way that reduces car dependency, makes walking, wheeling, cycling and micro-mobility safe and attractive travel choices, and reduces emissions from transport.” It is unclear how the land will be shaped to improve the urban form and street design. For example, Council considers urban intensification should be a priority and greater investment is needed in footpaths and cycleways.	GPS 2021 should define how the “urban form” and “street design” will be shaped to deliver outcomes. This will provide clearer direction for Waka Kotahi to implement through the Investment Assessment Framework.

Pages 16-17, section 2.2 (Strategic Priority: Safety)	There is a need to expressly consider the safety needs of children who need to travel, including gaining independence to access education, play, and socialising.	Include consideration of safety for young children.
Paragraph 61, page 18, section 2.3 (Strategic Priority: Better Travel Options)	Paragraph 61 states, “The primary focus of this priority is to improve people’s ability to get to places where they live, work and play and to make sure our major cities have transport networks that are fit-for-purpose.” Greater recognition should be provided to the need to access crucial retail, healthcare and educational services. This, for example, should encourage the Ministry of Education to consider access when relocating schools.	Amend paragraph 61 to, “The primary focus of this priority is to improve people’s ability to access essential businesses; places where they live, work, educate and play; and to make sure our major cities have transport networks that are fit for the future.”
Paragraph 62, page 18, section 2.3 (Strategic Priority: Better Travel Options)	Cultural well-being is missing from the discussion of co-benefits.	Include cultural wellbeing in the discussion of co-benefits.
Tables 1 and 2, pages 24-25, section 2.6 (Indicators for how progress will be measured)	There is no indication as to whether or how the five transport outcomes will be weighted.	Clarify whether transport outcomes will be weighted, and if so, how.
Paragraph 143, page 39, section 3.7 (Statement of Ministerial Expectations)	Bullet 5 of paragraph 143 states that the Minister expects that Waka Kotahi will “... encourage future-focused planning, such as through designating and authorising land use for transport, to provide certainty to the sector and communities”. Designating land use for transport, is not a concept that is used in other strategic documents, so it is not clear what is meant. Designations are a specific tool in the Resource Management Act 1990 for network utilities, and not necessarily land use.	Replace bullet 5 of paragraph 143 with the following text, “encourage future-focused planning, such as providing for higher density land use along public transport corridors, to provide certainty to the sector and communities”.
Page 46, Appendix 3 (Summary of key policy direction documents)	ATAP is included in the list of key policy direction documents. ATAP is a regional plan. Only nationally issued documents should be included in the list of key policy direction documents.	Remove ATAP from the summary of key policy documents in Appendix 3.