

18 April 2018

Attn. GPS Policy Team
Ministry of Transport
P.O. Box 3175
Wellington 6140
gps2018@transport.govt.nz

Re: Draft Government Policy Statement on Land Transport

This submission from the Architectural Centre. We are an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

Overall the Architectural Centre strongly supports this shift in transport priorities towards better supporting and funding of active and sustainable transport. We have the following comments to make:

1. We agree that the **space allocation and use of roads** needs rethinking in relation to efficiency of use, economic effectiveness, road safety and the liveability of our cities (including suburbs). We recommend:
 - (a) **removing roadside car-parking from arterial roads** to enable greater flexibility and options for supporting public transport priority and cycling and pedestrian infrastructure, including shared spaces as appropriate.
 - (b) **prohibiting car-parking requirements in developments** through a mechanism such as a National Policy Statement on Land Transport and Land Use, or a revision of the NPS on Urban Development Capacity (which might be retitled to broaden its scope e.g. Urban Development and Land Use).
 - (c) the development of a **new road design for the twenty-first century** which better reflects priorities of active and sustainable transport modes. While we recognise some instances where segregated mode space maybe needed, we warn against an automatic assumption of segregation of modes as a default position due to space usage, and cumbersome ramifications (especially at intersections). Segregation can cause inelegant spaghetti design which hampers access due to inflexibility of routes for different modes. **We think road design needs a total rethink.**
 - (d) research which considers **the time-space efficiency of road space**, including, for example, how to make use of tidal flow systems, and to flatten peak use (e.g. through encouraging glide time for workplaces and schools; flexi-working and tele-commuting).
 - (e) enabling **congestion charging** as a tool to manage the space allocation and use of roads.
 - (f) the use of road design to support sustainable energy supply. In this regard we refer to **Sweden's innovative electrified road**, where tracks recharge batteries in electric cars and trucks, with plans for 20,000km of



the architectural centre inc.
PO Box 24178 Wellington

highway to be electrified.¹

2. We strongly support the indication that the second stage GPS will include input from the Climate Change Commission. We recommend that **economical, rather than financial, cost:benefits** are undertaken in relation to transport projects, and that these consider **true costs**, including traditionally externalised costs. To properly achieve this is likely to require further research on, for example, the quantification of the value of urban design, heritage and well-being. This notion of "true costs" is our understanding of the GPS' reference to decision makers taking "into account the full range of benefits and costs over the whole life of investments" (p. 8). We note that, in order to support this new kaupapa, changes to the RMA will be needed. For example, Part 2 of the RMA requires decision-makers to "*have particular regard to ... the effects of climate change*" (s7(i)), but nowhere does the RMA require decisions regarding development to take into account activities which will exacerbate or cause climate change. We also recommend that the RMA be amended to require a climate impact assessment to form part of an adequate consideration to alternatives in roading (and other) infrastructure projects (e.g. ss171, 168A).
3. We can also only support the notion of a mode-neutral approach to transport planning (p. 23) if a "true costs" evaluation is taken.
4. We strongly support the GPS' recognition of **the importance of land use planning**, and the effect a mode shift from single-occupancy private vehicles to active and sustainable transport modes. In these regards we note the importance of supporting or replacing multi-destination trips (e.g. school trips), and providing transport options for transporting large shopping loads. In this regard we acknowledge the indication in the GPS that projects aimed at "*increasing the uptake of children using safe and active travel, especially to and from school*" (p. 15) will be supported. We also consider that funding soft infrastructure initiatives and appropriate expertise (e.g. psychologists) in order to understand and **effect behaviour change** is an important aspect of this, in addition to traditional hard infrastructure solutions.
5. We consequently encourage stronger statements regarding **higher density building in cities to prevent urban sprawl** to facilitate more efficient land use and a mutually-beneficial relationship between transportation and land use. The reference to supporting "*urban growth through opening access to new housing developments and existing housing*" (p. 13) needs to be tempered. This could be read to encourage greenfield development and urban sprawl.
6. We do however encourage the identification of existing populations which would benefit from **better connection through high-speed trains**. A high-speed train between Auckland and Hamilton has been raised and should be put into effect. A similar train between Dunedin and Christchurch might make train competitive with air travel. A reduction in travel times (with an increase in frequency) between Wellington and the Wairarapa, and Wellington and Palmerston North, could also assist in regional development. This is not to say that we support new developments which will largely be reliant on private cars for their viability, as appears to be the case, for example, in the proposed Shelley Bay development in Wellington, which will have no public transport infrastructure guaranteed.

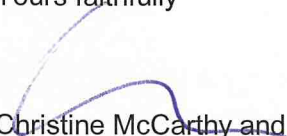
¹ Boffey, Daniel "World's first electrified road for charging vehicles opens in Sweden" *Guardian* (12 April 2018) <https://www.theguardian.com/environment/2018/apr/12/worlds-first-electrified-road-for-charging-vehicles-opens-in-sweden>

7. We also support the GPS prioritising **the electrification of the whole rail network**.
8. These issues have ramifications for District Plans, and (as above) we suggest the best mechanism for **ensuring that District Plans represent the intentions in the GPS** is that a NPS on Land Transport (or an NPS on Urban Development and Land Use, which updates and replaces the current NPS on Urban Development Capacity 2016) directs Regional Policy Statements and District Plans in order to effect the GPS.
9. We also support the facilitation of inter-modal connectivity through supportive fare structures, including transfers. We note the reference to a green transport card (to provide fare reductions to those on low incomes) being anticipated in the second stage GPS (p. 16), and reference in the GWRC long term plan consultation document to "*a national approach to integrated ticketing*."² We see the potential for such a **national travel card system** to support tourist use of mass public transit as well as mode shift for locals, and we encourage moves in this direction.
10. We appreciate the explicit recognition of **the importance of the urban environment and urban form** to create "*liveable cities that value public space and improve access*" (p. 8). In this regard we also note the need for transport projects to have greater cognisance of their impact on the built environment from heritage and sustainability perspectives.
11. We also acknowledge the commitment in the GPS to "*support investments that make streets more inviting places for people. This should encourage more housing development in these areas and more city living*" (p. 13). We support this, especially adaptive reuse to increase density, and higher density residences, matched with **requirements for open space**, green parks, and other community infrastructure needed to make higher density viable and sustainable. This includes protecting our green belts, ridges and coastal habitats to also ensure long term amenity values in higher density areas.
12. We encourage greater emphasis in the GPS being put on supporting a culture change from individual car ownership, to shared ownership or a services model of transport (e.g. car share). Public transport, such as taxis, are an important part of this, given they reduce embodied energy and the road space needed for car parking (compared to the equivalent private car use) if they supplement a core reliance on mass public transit and active modes. We also consider that an understanding of the role of mopeds, motorbikes and e-bikes, as distinct components of the transport hierarchy, due to their greater energy-efficiency, vehicle size, and different speed to manual bikes, is important.
13. We agree that technology will impact on transport efficiency and effectiveness (p. 24). In addition we suggest the impact of technology to remove the needs for transportation (e.g. 3D printing - which could reduce freight needs, for example) will also shape transport needs in the future.
14. Finally the GPS appears to be overly repetitive, and we recommend that it be reviewed to reduce repetition to make it more user-friendly.

² Greater Wellington Regional Council "Consultation Document for the Greater Wellington Regional Council Long Term Plan 2018-2028" p. 7. <http://www.gw.govt.nz/assets/2018-uploads/LTP-Consultation-Document-web23.03.18.pdf>

Thank you for this opportunity to submit on the draft GPS on Land Transport. If you have any questions please do not hesitate to contact us.

Yours faithfully



Christine McCarthy and Daryl Cockburn
co-presidents
Architectural Centre