



NZ TRANSPORT AGENCY
WAKA KOTAHI

17 APR 2009

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16 April 2009

Chief Executive Officer
Christchurch City Council
P.O. Box 237
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Attention: Tony Marryatt

Dear Tony

Council Draft Ten Year Plan Submission

Thank you for the opportunity to comment on your Council's Draft Long term Council Community Plan 2009-19 (LTCCP). The NZ Transport Agency (NZTA) acknowledges the efforts of local authorities in preparing their LTCCPs. In particular, NZTA believes the LTCCP has an important role in ensuring integrated decision making and coordination of resources between relevant agencies while providing for a long-term focus for the decisions and activities of the Council.

As a fellow partner to the Greater Christchurch Urban Development Strategy (UDS) we recognise the importance that your council has placed on ensuring that your LTCCP reflects and underpins your commitment to the UDS. While, I have outlined minor comments below on the LTCCP, I consider that overall the LTCCP to be consistent with the direction of the UDS and the Christchurch contribution to the Regional Land Transport Programme (RLTP) and therefore we are generally supportive of the material contained in this document.

NZTA is committed to working collaboratively with local government and other organisations to develop the land transport system in an integrated and sustainable manner.

NZTA Organisational and Legislative Background

NZTA was established on 1 August 2008 through amendments to the Land Transport Management Act 2003 (LTMA). NZTA is a new Crown entity created by combining the roles of Land Transport New Zealand (LTNZ) and Transit New Zealand.

NZTA's statutory objective is to undertake its functions in a way that contributes to an affordable, integrated, safe, responsive and sustainable land transport system. When undertaking its functions, NZTA must give effect to the Government Policy Statement on Land Transport Funding (GPS). It is also guided by goals expressed in the New Zealand Transport Strategy (NZTS) relating to economic development, personal safety and security, access and mobility, public health and environmental sustainability. The GPS is currently being reviewed by the Minister of Transport who is consulting with Local Government New Zealand. The final form of the GPS post review will be given effect to by NZTA in the National Land Transport Programme to be released in August 2009.

Having regard to the above and our respective statutory responsibilities under the LTMA we offer the following comments for your consideration.

Specific Comments on the Draft LTCCP

We have the following specific comments on the LTCCP:

Volume 1

1. Page 25; - transport strategic issues -NZTA acknowledges that in developing your LTCCP you have recognised the New Zealand Transport Strategy and Regional Land Transport Strategy principles of integrated transport and land use to obtain better efficiencies from the transport network.
2. Page 29, - Urban Renewal - NZTA endorses the planned investment in urban renewal projects as a key component of the UDS implementation. On a related matter, the NZTA also supports the strategic intensification review, with a first plan started by December 2010 (See page 193, Volume 1). We consider this review and subsequent plan development phases are critical to the success of the implementation of UDS growth scenarios and we therefore encourage the council to develop this programme. However we would like to see the indicated activities expanded to include a full suite of associated plan development activities over the 10 year LTCCP period or at least to the LTCCP review date of 2012.
3. Page 30 and 88 and 259, - northern routes projects - \$63.4m has been indicated to address the northern routes between 2016 – 2019. This is indicated as being provided towards the end of the period NZTA is planning to implement the associated state highway northern routes projects which currently is programmed for completion in 2016. Council is no doubt aware that the northern arterial is a project recently identified as part of the Roads of National Significance announced by Government. NZTA anticipates that Government will wish these works to be brought forward and is currently assessing how this might impact on the draft RLTP. It is important that NZTA and the council work together to ensure that each delivers its components of the projects in a timely coordinated manner in order to ensure the potential benefits of these corridor improvements are fully realised. We would therefore ask that the Council consider advancing the timing of the northern road projects to be brought forward for commencement by 2013 in particular the QE11 to Cranford St link and the Hills Rd Extension. We acknowledge that this may cause potential issues of balancing your LTCCP funding forecasts. However we view this as an urgent matter that needs to be addressed to align with Government funding announcements.
4. Page 30, - Passenger transport – NZTA acknowledges the forecast investment at \$162m over 10 years including bus priority for Hornby (2010–11); New Brighton (2011–12) and Sumner (2012–13) and Cranford (2017-18). However we suggest that in order to gain full advantage of the Hornby priority measures it is vital that the Deans Road/ Riccarton Road intersection upgrade is implemented concurrently with these measures. At present this project is in the unfunded capital works list. We therefore ask council to commit to implementing this project to coincide with the timing of the Hornby Bus Priority project.
5. Page 36, - Council approach to funding. NZTA acknowledges your principle of maximising the use of external funds such as NZTA funding assistance as a priority source of project funding. NZTA accepts that this is prudent way of maximising the use of council's other revenue streams such as rates income. NZTA will wherever possible support council's requests for funding assistance through the National Land Transport Programme. In recent years we are aware that this has not always been the case and that council has constructed a significant amount of road works without our funding assistance or at times with less than optimal funding assistance. We urge council to ensure that its planned transport investments do achieve value for money and in particular that

maintenance renewal activities are undertaken to achieve the least cost whole of life solutions so that we can agree an optimal funding assistance outcome for council and NZTA.

6. Page 81 - Transport safety - identifiable transport safety initiatives and programmes seem to be under represented in the LTCCP. The NZTS road safety targets in your Activity Management Plan support a reduction of crashes with a target of no more than 200 road deaths by 2040. However we note with concern that the AMP anticipates increases in fatal and serious injuries from 203.3 in 2009/10 to 207.9 in 2011/12. This appears inconsistent with the NZTS and in our view does not demonstrate a commitment to improving transport safety through investment as signalled in your scoring of safety for transport as a community outcome (page 81). We request the council clearly explain its approach to transport safety and provide full explanation of its choice of targets and how these relate to planned investment in transport.
7. Page 83, - walking and cycling. We note that the Council is seeking to maintain walking/ cycling mode share. We note that council will be undertaking an intensification programme as part of its UDS commitments. We would support this and note that this should have benefits for walking and cycling. However we are concerned that council will not be able to maintain these mode shares when there has been a significant reduction in the investment signalled by the council within the RLTS as being necessary to be successful. We ask that council explain how the planned investment will achieve this target and the support the UDS transport planning. We also suggest there should be further targets beyond 2010 to implement the RLTS mode share targets and the UDS intensification strategy.
8. Page 82, - Cycle Safe programme - this is identified but only has a target shown for 2009/10 NZTA has supported this programme in the past and sees it as a useful tool for providing children with cycle safety education and encouraging a shift from children being driven to school to being able to cycle by themselves. Our support in recent years has been in part recognising that council has been acting as a pilot study area for this programme and that in time it would provide case studies and a tool box that NZTA could roll out through other councils. NZTA also anticipated that the coverage of the programme in Christchurch would be broadened and hence would have expected the targets to be for increased coverage over time, not ceasing as currently indicated. Please clarify if the council intends to continue to fund this programme beyond 2009/10 and if so what the targets will be.
9. Page 83, - The targets for walking and cycling are not being improved - only maintained. To achieve some of the community outcomes (Healthy, Recreation and Development) there will need to be improvements in levels of walking and cycling. These targets appear inconsistent with the recently advertised TDM strategy.
10. Page 84, - School Travel Plans - NZTA agrees that these are one implementation tool for a successful Travel Demand Management Strategy and we supports the target of 4 plans per year, presumably this is to a completed stage?. We suggest there would be merit in separately identifying the travel to work programmes which are included within the Travel Demand Management Strategy Implementation plan.

11. Page 85, - Public Transport- the target is to maintain a mode share of 3.4% for the years 2009/10 to 2011/12. Given the planned levels of investment in Public Transport related activities by council and associated service improvements by Environment Canterbury, NZTA would have anticipated a forecast increase in the mode share of public transport. We note too that the target appears inconsistent with the targets set out in the RLTS. We also note the target for the shuttle service is for a substantial; approximately 20% decline. Can council please explain this and how it potentially impacts on the Public Transport strategy.
12. Page 85 - The target for the mode share of private motor vehicles trips is to be maintained at 84.9% of all trips. This is inconsistent with the targets set out in the RLTS and in our view requires explanation.
13. Page 192 - District Plan. NZTA supports statements to the effect that the District Plan supports the implementation of the UDS and that through District Plan revision and management the full benefits of integrated land use and transportation planning can be realised.
14. Page 255, - Christchurch Transport Interchange- the cash flow indicates that the major construction will be over the 2011/12 to 2013/14 years. NZTA is pleased council is also proposing a Central City Bus Priority project to support the new interchange along with the other bus priority projects that have already been started and are planned.
15. Page 259, - Street Renewal Programme - It is proposed to spend \$19m in 2009/10 increasing to \$25m in 2011/12 on this programme. NZTA's comments in bullet 5 above are particularly relevant to this item. We ask that council give this urgent attention in order that we can agree a forward programme of renewals that are eligible for funding assistance on a least cost whole of life approach to network management.
16. Page 193 - Area Plans -NZTA supports the development of the area plans for South West Christchurch and Belfast.

Asset Management Planning

NZTA has reviewed the Transportation Activity Management Plan that forms the background information for the Transportation section of the Draft LTCCP document and considers it provides good supporting information for the LTCCP documentation. We also note that there appears to be strong and consistent alignment between the AMP and the LTCCP.

However we do have some concerns with respect to the levels of service indicated and assumed asset renewal lives which in our view are difficult to substantiate. We will address these more fully in our consideration of your funding requests for maintenance and renewal activities as they arise and when we have an opportunity to fully assess your Activity Management Plan.

Development Contributions Policy

NZTA supports local authorities adopting Development Contributions Policy that seek to allocate the costs of infrastructure development required as a result of new development to those developers. The policy looks comprehensive. In our view the assumption of reduced growth within the next three years provides a reasonable basis for establishing the policy.

Integrated Planning

NZTA supports the discussion on page 88, Volume 1 which outlines the important relationship between the Regional Land Transport Programme and the LTCCP. This is a fundamental principle for aligning funding for transport improvements.

Major Capital Projects and Financial Summary

The Streets and Transport capital programme is clearly influenced by the timing of the two major projects, the Public Transport Interchange and the Northern Arterial Extension (and associated roading projects). The timing of these projects within the LTCCP shows that the council has aimed to smooth the cashflow.

We wish to be heard in regard to our submission

Again, we would like to thank you for the opportunity to comment on the Draft Long-term Council Community plan. If you have any queries relating to our comments, please do not hesitate to contact Steve Higgs, ph 3721813 or email Steve.higgs@nzta.govt.nz.

Yours sincerely



Mark Yaxley
Regional Director
New Zealand Transport Agency