



N.Z. ROAD TRANSPORT ASSOCIATION REGION 4

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16 April 2009

Draft LTCCP
Christchurch City Council
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Submission Draft Long Term Council Community Plan 2009-2019

1. INTRODUCTION

- 1.1 NZ Road Transport Association Region 4 is a constituent member of Road Transport Forum NZ, representing goods transport operators in the hire and reward sector. The Association represents approximately 500 members, operating approximately 2000 trucks and commercial vehicles in the South Island north of the Waitaki River and including Nelson/Marlborough and the West Coast.
- 1.2 Members service all sectors of the economy and operate fleets ranging from single vehicle owner operators to fleet operators with in excess of 100 trucks in multiple locations. Members service the region with intra and inter-regional operations and services. Many members offer multi-faceted operations including road transport services, contracting, warehousing, import and export services, customs clearing, freight forwarding, container handling and storage with the largest number of members operating in the greater Christchurch area.
- 1.3 The Christchurch branch of the Association represents over 400 commercial goods transport operators and more than 260 members are located in and around Christchurch operating approximately 1100 trucks in the hire and reward sector. They deliver goods to all parts of the city and range from couriers to large vehicles delivering bulk loads and bulk commodities. In addition they transport goods for inter-regional and international destinations.

2. BACKGROUND

- 2.1 The purpose of this submission is to request the City Council to adopt and implement strategies and projects that will improve the efficiency of moving goods and freight in and around Christchurch to meet the growing demand for freight in the Canterbury region.

- 2.2 The National Freight Strategy¹ predicts that Canterbury will have one of the highest growth rates for freight in New Zealand. The Study predicts that freight traffic attracted to the Canterbury region will double from 20 million tonnes currently to 40 million tonnes by 2031.
- 2.3 Christchurch is the major distribution centre for freight in the South Island and is also a major producer and importer of goods. Lyttelton Port of Christchurch is a major import and export centre for the region and its location to the east of the city requires freight to move from the north/south corridors through the city to the port.
- 2.4 The freight generated is predominantly short haul and is most economically carried by road. While the Canterbury Regional Land Transport Strategy (RLTS) encourages increased share by other modes such mode share change will have little effect on freight generation but has the potential to increase freight movements to and from the port or rail hub.
- 2.5 Therefore there will be a continued and substantially growing demand for freight movement within the city and across the city.
- 2.6 Christchurch already has high congestion levels on major arterials and the council's own projections are for an increasing reduction in the Levels of Service (LOS) and for an increasing number of roads to suffer reductions in LOS. That will not be improved by changing modal share.
- 2.7 It is therefore essential that the city plan for the efficient movement of freight now to meet the future demand.

3. SCOPE OF SUBMISSION

- 3.1 This submission advocates for measures that will make freight transport more efficient and proposes
- Advancing capital projects to reduce congestion and bottlenecks on freight routes
 - Permitting goods vehicles to share bus lanes with buses
 - Adopting policies for the innovative construction of cycle ways that avoids the dangerous mixing of vulnerable modes on arterial roads and strategic freight routes
 - Improving pavements where noise nuisance is a significant issue to residents and
 - Adopting policies that avoid placing restrictions on the operation of freight vehicles in and around the city.

¹ National Freight Study, Report for Ministry of Transport by Richard Paling & Associates 2008

4. PROJECT ADVANCEMENT

4.1 Northern Access

- 4.1.1 Marshlands Rd is designated as a Strategic Freight Route in the RLTS and is an important route for freight moving from and between producers in districts to the north, particularly Waimakariri District, and the port.
- 4.1.2 The LOS on Marshlands Rd is deteriorating rapidly and particularly as a result of the bottleneck caused by the Marshlands Rd/Prestons Rd roundabout. This is adding cost to the freight being carried but is also resulting in alternative routes being taken through residential areas to avoid the congestion. We are concerned that residents will complain and call for restrictions on freight vehicles further adding to the problems.
- 4.1.3 We note that the LTCCP provides for improvements to the intersection to be completed in 2011/12 but submit that this should be advanced with urgency.
- 4.1.4 The importance of good and efficient access to the north of the city has been highlighted in numerous studies culminating in the proposals for the Northern Arterial Access. We are concerned that despite the rapid deterioration in the LOS on both Marshlands Rd and SH 1 (Main North Rd) and the predictions for very substantial freight growth on these routes that construction of the Northern Arterial Extension is not forecast to begin until 2017/18 ie it will be at least 10 years before additional road capacity is provided to overcome these already heavily congested routes.
- 4.1.5 We submit that these projects be advanced with urgency to meet the current and predicted freight demands on this route.

4.2 Lyttelton Port Access

- 4.2.1 The industry faces a number of issues with access to the port at Lyttelton. These are different for the disparate parts of the port but require improvement.
- 4.2.2 In our view the most serious and urgent need is for an alternative access to the fuel tank farm. Fuel transporters have raised concerns for safety at the intersection of Godley Quay and Simeon Quay and safety audits have been undertaken by Council and Land Transport NZ and the need for substantial and expensive improvements was identified.
- 4.2.3 We do not agree with the intersection treatment proposed in the Council staff's report and instead would recommend

investigation of an alternative route via the disused rail line from Cyrus William Quay. This would allow trucks to follow a one way circuit and eliminate the dangerous right turn at the Godley/Simeon intersection.

4.2.3 However, we are unable to identify any project in the LTCCP that will improve this access and request inclusion of this project in the LTCCP.

4.2.4 Norwich Quay (SH74) is the prime route to the Lyttelton Container Terminal. In our view an alternative to this route would be expensive and difficult to justify for funding as it is unlikely to have a high Benefit:Cost Ratio.

4.3 Northcote Road 4 laning

4.3.1 The LOS on Northcote Rd is deteriorating quickly. As part of the arterial ring route it is a major freight route around the city. However the congestion on Northcote Rd is resulting in freight vehicles using other, less desirable, routes to avoid the congestion.

4.3.2 We note that the LTCCP forecasts design to commence 2015-16.

4.3.3 We recommend advancing this project by at least 3 years.

5. USE OF SPECIAL VEHICLE LANES

5.1 In principle, the Association supports lanes that give priority to buses enabling them to maintain timetables etc. It recognizes the value of high quality and reliable passenger transport services to reducing the use of private cars and reducing congestion.

5.2 The freight task faces similar imperatives to passenger transport services ie

- Delivery at the lowest economic cost
- On-time delivery
- Efficient use of vehicles
- Efficient use of road space.

5.3 We consider that some bus lanes could be used by good service vehicles and this could be achieved by re-designating proposed bus only lanes as Special Vehicle Lanes (SVL).

5.4 Allowing goods service vehicles to use these lanes for through transit purposes only, would assist both passenger and goods operators through congestion reduction, improved traffic flows and reduced costs.

- 5.5 However in doing so we accept that it would be necessary to examine each SVL on a case by case basis. Consideration would need to be given to impediments such as priority signal use and factors such as the number of bus movements. However on lanes that have irregular or less frequent bus movements positive consideration should be given to enabling goods service vehicles where there are positive economic and other benefits.
- 5.6 Consequently we recommend the LTCCP adopt a policy for use of special vehicle lanes that recognises the economic benefits and other benefits including environmental benefits.

6. CYCLE WAYS

- 6.1 The Association generally opposes 'on road' cycle lanes on arterial routes where they are part of the Strategic Freight Network and has made submissions to the Council opposing the designation of some cycle lanes under the Council's bylaws.
- 6.2 However the Association does not oppose the provision of cycle ways for cyclists in general. We note and commend the comment in the LTCCP that 'it is good to see designated cycle lanes taken off roads' (Sandy Brinston). Unfortunately this comment may be the perception but the reality is that cycle lanes continue to be painted on roads with little imagination or innovation.
- 6.3 Arterial routes are unsuited for on road use by slower and more vulnerable road users. The routes are intended for use by freight vehicles which are discouraged from using local roads. Local roads with lower traffic volumes, slower speeds and lighter vehicles are however better suited for use by cyclists.
- 6.4 Strategic freight routes (as defined by the Regional Land Transport Strategy's Freight Action Plan) and arterial networks should, wherever possible, be free of on-road cycle lanes. Alternatively, if cycle ways on these routes are necessary they should be designed to offer full protection to cyclists and avoid conflict between modes. This may include providing off road facilities or physical barriers between conflicting traffic but there is considerable scope for innovation in the design of safer cycle lanes.
- 6.5 We are concerned about the lack of innovation in the design of cycle ways with cycle lanes generally being incorporated into the existing road space by narrowing other traffic lanes or removal of parking, sometimes in areas where goods vehicles must stop for deliveries. We are also concerned that the design standards used by the Council where cycle lanes are adjacent to parking lanes are inadequate and insufficient to enable trucks to park without incursion into the cycle lane.

- 6.6 We recommend that the LTCCP make provision for the investigation of innovative designs to improve the safety of cyclists particularly by providing facilities that physically separate vulnerable cyclists from other modes.

7. NEIGHBOURHOOD PAVEMENT IMPROVEMENTS

- 7.1 The association has received complaints from Council about trucks using roads in the HeiHei/Hornby areas. It has addressed the issues with the community board at its invitation. The board recommended to the Association that it make recommendations through the LTCCP for improvements to the roads in the area.
- 7.2 Both Gilberthorpe Rd (Collector) and Buchanans Rd (Arterial) are wide roads well designed for the type of traffic they carry. However they require considerable maintenance and improvement of the road surface. The road surface of Buchanans Rd, particularly east of Gilberthorpes Rd is rough and has some potholes. This roughness causes trucks to bounce which will cause noise from empty trucks in particular. Gilberthorpes Rd is also fairly rough as a result of the addition of underground services over time and many laterals running across the road.
- 7.3 Mitigation of noise from heavy vehicles may be possible through improving the surface of the roads on these streets and applying quieter road surfacing materials
- 7.4 Gilberthorpes Rd and Buchanans Rd are collector and minor arterial roads respectively and because of their importance to the network for these purposes we could not support any suggestion of a restriction and, in fact, a restriction would likely to be contrary to the Regional Land Transport Strategy's Freight Action Plan.
- 7.5 Buchanans Rd serves as a direct route from the commercial and industrial sites to the east of Carmen Rd to link with SH 73. The numerous restrictions in this area exacerbate congestion issues on other roads. Some use Gilberthorpes Rd to bypass Carmen Rd because of the congestion on Carmen Rd and at the Main South Rd intersection despite improvements to that intersection a couple of years ago. The alternative of using Pound Rd as a bypass is not satisfactory because of the difficulties of the intersections of Barbers Rd with Main South Rd and Pound Rd with SH73.
- 7.6 We note that Transit New Zealand's 08/09 LTP has the Pound Rd/SH73 intersection programmed for construction in 08/09. However the likelihood of any improvement at the Main South Rd end appears to be a long way off and probably not until after the construction of the Southern Motorway next decade.

- 7.7 We note that there are no projects contained in the LTCCP to improve either Gilberthorpes or Buchanans roads, nor are intersection improvements to make Pound Rd an effective bypass included.
- 7.8 We recommend the LTCCP be amended to include improvements to the surfaces of Gilberthorpes and Buchanans Rds.
- 7.9 We further recommend the LTCCP be amended to include intersection improvements at Pound Rd, Waterloo Rd and Barbers Rds in conjunction with NZ Transport Agency and that the improvements be given urgency.

8. CONCLUSION

- 8.1 This submission has concentrated on issues on roads in Christchurch that affect the efficient operation of the network for freight deliveries.
- 8.2 The deficiencies add cost to transport movement in the city with a negative effect on the economic development of the city.
- 8.3 The proposals advanced in this submission, such as re-designating bus lanes as SVLs to permit their use by goods service vehicles, and the adoption of a policy of removing cycle lanes from the strategic freight network, will improve the safety and efficiency of the network.
- 8.4 We would urge greater innovation in the design of cycleways to enhance their benefits to, and use by, cyclists but to also improve the safety of the roads for all road users.
- 8.5 The efficiency of the network is also detrimentally affected by area plans and city bylaws that restrict access by freight vehicles. We urge the council to avoid restrictions but to make improvements to the roads that will mitigate nuisance from noise to residents.

9. SUMMARY OF RECOMMENDATIONS

- 9.1 We request the Council to adopt and implement strategies and projects that will improve the efficiency of moving goods and freight in and around Christchurch to meet the growing demand for freight in the Canterbury region.
- 9.2 We recommend that the LTCCP be amended by advancing the project for improvements to the Marshlands Rd/Prestons Rd intersection to be completed in 2011/12 with urgency.
- 9.3 We recommend that the Northern Arterial projects be advanced with urgency to meet the current and predicted freight demands from the north of the city.

- 9.4 We recommend the LTCCP be amended to include a project to improve safety at the intersection of Godley and Simeon Quays, Lyttelton and that the construction of a one way road on the disused rail line be investigated.
- 9.5 We recommend advancing the 4 laning of Northcote Rd by at least 3 years.
- 9.6 We recommend the LTCCP adopt policies for use of special vehicle lanes by goods service vehicles that recognise the economic and other benefits including environmental benefits.
- 9.7 We recommend that the LTCCP make provision for the investigation of innovative designs to improve the safety of cyclists particularly by providing facilities that physically separate vulnerable cyclists from other modes.
- 9.8 We recommend the LTCCP be amended to include improvements to Gilberthorpes and Buchanans Rds.
- 9.9 We further recommend the LTCCP be amended to include intersection improvements at Pound Rd, Waterloo Rd and Barbers Rds in conjunction with NZ Transport Agency and that the improvements be given urgency.

10. HEARINGS

The association requests the opportunity to present oral submissions to the Council Hearings Panel.

Please contact the undersigned.



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