

7 September 2023

Ministry of Transport  
3 Queens Wharf  
Wellington 6011

03 941 8999

53 Hereford Street  
Christchurch 8013

PO Box 73013  
Christchurch 8154

[ccc.govt.nz](http://ccc.govt.nz)

Email: [GPS@transport.govt.nz](mailto:GPS@transport.govt.nz)

## Christchurch City Council submission on the *draft Government Policy Statement on land transport 2024*

### Introduction

1. Christchurch City Council (the Council) thanks the Ministry of Transport for the opportunity to provide comment on the draft Government Policy Statement on land transport 2024/Te Tauākī Kaupapa Here a te Kāwanatanga mō ngā waka whenua.
2. The Council supports the overall direction of the draft Government Policy Statement and particularly welcomes the focus on maintenance, 'building back better', and resilience. These challenges are all particularly prominent for our city and region. We would welcome a greater focus on Christchurch and the wider Canterbury region, which is not well represented in the investment programme or the wider strategic narrative. Christchurch is the second most populous urban area in the country, and the GPS needs to reflect its national importance.

### Submission

#### *Strategic Priorities*

3. The Council supports the six strategic priorities outlined in the draft GPS; in particular the addition of 'maintaining and operating the system', and the new configuration of 'climate change' into 'increasing resilience' and 'reducing emissions'. The priorities demonstrate strong alignment with the Council's strategic priorities and indicative long term plan priorities, including a focus on renewals, resilience, and emissions reduction. They also support our current programmes of work, such as the Major Cycle Routes, improving our public transport system and the Pages Road Bridge.
4. We note that the priorities work together to promote a transport system that provides for the needs of current and future generations, and we support the prioritisation of interventions that deliver benefits across multiple objectives to achieve this.
5. Maintenance of our current assets is a big concern and focus for the Council, and for the wider region. The Council strongly supports the addition of this strategic priority and the focus on maintenance throughout the document. We note that there is increasing international recognition that maintaining what we have is more worthwhile than building new infrastructure, in the long term.
6. The Council also strongly supports the focus on resilience and reducing emissions; we agree that the strategic priorities work together to reinforce this priority and we echo the call for urgency in addressing these priorities. The Council submits that the current lengthy business case analysis process can present delays to implementing initiatives to build resilience and reduce emissions. We hope that the 'build back better'

principle will help to introduce more flexibility and provide greater scope for councils to be able to expedite projects that achieve these priorities.

7. We support the priority to increase the resilience of our roading network – this is a priority across Christchurch and especially on Banks Peninsula, where heavy rain events have caused slips and flooding leading to road closures, and where sea-level rise will have a large impact over the coming years.
8. The sustainable urban and regional development priority supports the Council’s planning for ‘walkable catchments’. This focuses on providing better travel options for households to access work, education, and necessary services, within a 15-minute travel time and without having to rely on private vehicles. This in turn will contribute to reducing emissions. It is encouraging to see mention of well-functioning urban environments and the specific link with supporting higher-density development along well-connected transport corridors and in town centres.
9. This priority is supported by the investment intervention hierarchy, which suggests considering integrated transport and land use planning ahead of other, more costly, interventions - to maximise the use of the existing network, reduce travel demand, and support greater travel choice. These concerns are at the fore for Christchurch and Greater Christchurch, with the draft Greater Christchurch Spatial Plan scheduled to be considered for adoption by Partner Councils in early 2024. The draft Plan provides a blueprint for how population and business growth will be accommodated in Greater Christchurch into the future, through targeted intensification in centres and along public transport corridors.
10. The Council supports an integrated freight system, the implementation of which is supported by the One Network Framework. We look forward to continuing to put this priority into practice through our regional land transport planning.

#### *Strategic Investment Programme*

11. The Council requests that the Greater Christchurch Public Transport Futures and Mass Rapid Transit projects are elevated within the draft GPS into the Strategic Investment Programme to reflect the regional and national importance of these projects, and how far they are already progressed. We note that the Mass Rapid Transit indicative business case for Greater Christchurch has been completed. It already has an agreed route, a positive cost-benefit analysis, and the agreement of all partners to progress it to the detailed business case stage. There has also been a community engagement process through which positive community support for the project has been demonstrated.
12. The GPS does not accurately reflect the criticality of these projects to achieving a more compact urban form and reducing transport emissions, in Greater Christchurch. Mass Rapid Transit would have equal impact for the sub-region as the City Rail Link and North-West Rapid Transit projects will for Auckland or Let’s Get Wellington Moving for Wellington.
13. We also have a narrowing window of opportunity to deliver Mass Rapid Transit in Greater Christchurch at a cost that is net positive for government. This requires the commitment of all partners to progress it with some urgency.
14. In addition to capital funding for public transport, the Council also needs to work with Environment Canterbury to invest in an uplift in public transport services to match.
15. The Council notes that the majority of projects in the Strategic Investment Programme are focused on state highway expansion, and we would like to see the programme better reflect the full suite of stated priorities. Continued investment in infrastructure that encourages reliance of private vehicle travel over long distances

directly contradicts the goals of ‘improving access, affordability, community connectivity and environmental outcomes’ and ‘more efficient land use and resource use’, by encouraging urban sprawl over productive land.

#### *Funding increases*

16. Overall the Council supports increased funding, and the investment package outlined. It is not only welcome but absolutely necessary to maintain the condition of the network.
17. However, the Council is cautious in its approach to the apparent funding increases, due to the inflationary pressures of the last few years. Accounting for an average cost increase of around 30 percent, the actual increases are not great and while the sums of money themselves may have increased, this does not necessarily mean that purchasing power has also risen. The Council is needing to spend exponentially more on its infrastructure in order to simply maintain its assets to the same level, and any funding increase must be viewed in this context.
18. We also note that despite the overall increase in funding, there may not be much that is additional. For example, \$18.4 billion of the projected \$20.8 billion of NLTF funding over the next three years, has already been allocated to ‘essential expenditure’. This ‘essential expenditure’ includes maintenance needs, operating expenses, and existing commitments such as public transport subsidies, projects under construction, and debt repayment. This leaves only \$2.4 billion (a yearly average of \$800 million) to cover all new nationwide expenses. Moreover, this projected funding assumes that Waka Kotahi will secure a Crown loan of \$3.1 billion, which is not guaranteed.
19. It also appears that most of the direct Crown funding referenced in the document is already committed, with around \$200 million remaining as contestable by local councils. Similarly, the national resilience fund is \$120 million contestable – a small proportion of the total amount.
20. In addition to these funding constraints, the capacity of the sector to deliver on government expectations will remain an issue, as will the funding levers available to local government.
21. The Council notes that there is no mention of the expiration of the Road User Charge exemption on zero emissions vehicles in the context of NLTF revenue. Over half of new vehicle sales in New Zealand in July 2023 were EV or hybrid vehicles and our revenue system needs to change in line with this. If change does not occur, the shift in the composition of the national vehicle fleet will serve to lower revenues as the conversion speeds up. We suggest that the Future of the Transport Revenue System review is progressed with urgency, in order to address this issue. The Council supports the hypothecation of traffic infringement fee revenue to the NLTF to support safety investments.

#### *Funding for Activity Classes*

22. We note that the reallocation of safety funding to the state highway and local road improvements activity classes is likely to provide for greater flexibility for the Council to direct funding to where it is most needed and we welcome this. However, the Council has concerns that this approach may have unintended consequences by reducing the focus on safety improvements. It could risk those projects whose main value proposition/benefit is safety improvements, as these projects will have to compete with the full spectrum of improvement projects. It is unclear how this change would play out in practice, and the Council therefore suggests that the impact of the shift is monitored and reported on, to determine whether any unintended consequences are occurring.
23. The Council would also like clarification on whether the Standard Safety Intervention pathway will still exist for projects, under the new funding model.

24. We strongly support the funding increases for the walking and cycling improvements activity class, noting the general comments outlined in paragraphs 17 and 18 also apply here.
25. As a general principle we also wish to ensure that projects resulting in outcomes across unrelated activity classes are allocated funding appropriately. For example, rail network resilience investment and cycling networks.
26. The Council supports increased funding for KiwiRail and coastal shipping; as far as possible we support efforts to move heavy traffic off the roads. We also support funding that will increase rail safety.

*Ministerial expectations*

27. The Council agrees that the traditional indicators of economic efficiency are not sufficient to improve value for money. We would be interested to see further explanation of the list of measures given for Waka Kotahi to monitor progress against the outcomes sought (Table 1), including what factors will be used. We emphasise that there are substantial health benefit calculations inherent in our transport planning, such as the positive health impact of improving air quality through the reduction of nitrous oxide emissions from petrol and diesel vehicles. We must be careful not to lose sight of these (and the many other co-benefits), or diminish their importance.
28. The Council strongly supports the principle of building back better. This will mean that the Council can be more flexible and tactical in its planning, focusing on what is best for the future of our transport infrastructure and services, rather than being constrained to build back like for like. This could facilitate the approval of hybrid improvement/maintenance projects, or ones with alternative treatments, and the Council welcomes this forward thinking.

**Conclusion**

29. The draft GPS has a strong focus on people and place – these are important themes that underpin all aspects of transport planning and will ensure that the transport system improves wellbeing and liveability for our communities.
30. The Council thanks the Ministry for the opportunity to submit on the draft GPS 2024. We consider the GPS to be a positive step forward for the land transport system in New Zealand. Overall, it represents a balanced and thoughtful approach to the challenges faced, and a greater focus than previously on the longer-term needs of our communities.

For any clarification on points within this submission please contact Jane Cameron, Team Leader Strategic Transport (Jane.Cameron@ccc.govt.nz).

Yours faithfully



Phil Mauger  
**Mayor of Christchurch**