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Tēnā koutou katoa

CHRISTCHURCH CITY COUNCIL SUBMISSION ON SH76 BROUGHAM STREET UPGRADE PROJECT

1. The Christchurch City Council (Council) thanks Waka Kotahi – NZ Transport Agency (Waka Kotahi) for the opportunity to submit on the State Highway 76 (SH76) Brougham Street Upgrade Project.

GENERAL COMMENTS

2. Overall the Council recognises and supports the need for increased efficiency and safety for the SH76 Brougham Street corridor specifically as it services our national and regional freight route. The Council notes the need for increased safety and options for public transport and active travel along and across the corridor, as well as the need to take into account the impact of upgrading Brougham Street on the adjoining neighbourhoods, now and into the future.
3. The Council has adopted Kia Turoa tea o / Ōtautahi Christchurch Climate Resilience Strategy 2021, which has the target of reducing greenhouse gas emissions by 50 percent by 2030 for Ōtautahi Christchurch, particularly through reduced transport emissions. This aligns with Central Government targets. In response, Council considers that the greatest impact of this proposal is through the extension of the proposed T2 lanes beyond the current proposal and for guaranteed funding for enforcement of the T2 lanes.
4. The Council is very concerned that the timing of the consultation period was over the Christmas / New Year break. This may have meant that local residents, community groups and local organisations did not have had sufficient opportunity to discuss and appreciate the impacts of the proposal on their local streets and neighbourhoods. The Council wants to work with Waka Kotahi in informing the community, and developing solutions, to reduce and mitigate the impacts of the proposal on the local community.
5. With respect to community and environmental outcomes, the Council requests that the Urban and Environmental Design Framework developed through the SSBC is resurrected, implemented and funded

by Waka Kotahi. This would assist in addressing community and environmental impacts, as well as long term integrated planning, but should be extended to include neighbourhoods to the south of Brougham Street impacted by the proposal.

6. The Council want to ensure the downstream effects of this proposal on the local network and consequential changes to the local network are included in Waka Kotahi's total project cost. The success of the SH76 Brougham Street project is reliant on the Council making changes to its local network. The Council does not want these costs to fall on the ratepayers of Christchurch, as has occurred with the CNC project.

BACKGROUND

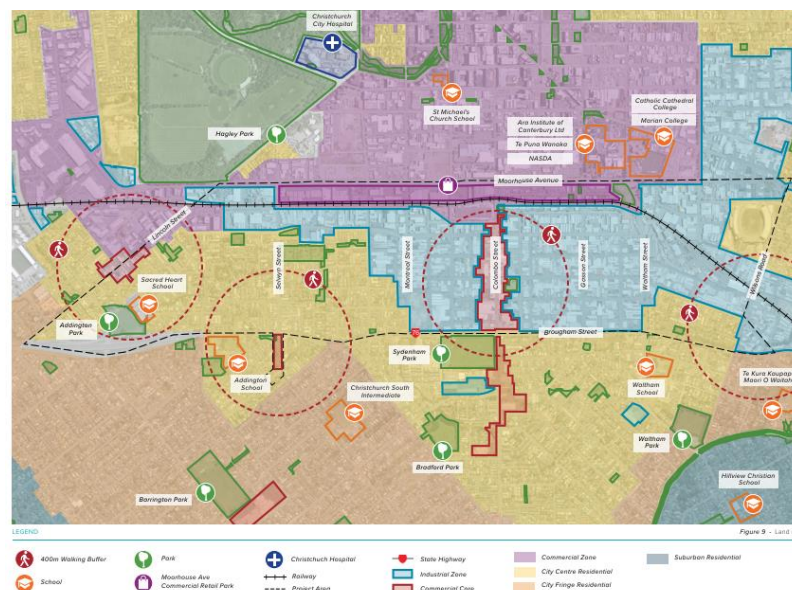
7. The Council notes that the SH76 Brougham Street Upgrade Project was part of the earlier business case work (Brougham – Moorhouse Business Case or SSBC), which is being jointly developed by the Council and Waka Kotahi since 2018. The SSBC was developed to address a range of land use and transport challenges, improve the safety of and access to active travel for the surrounding communities and prioritise freight movements. With the implementation of the NZ Upgrade Programme in 2020, the Council understands that proposed changes to Brougham Street have been accelerated ahead of other components of the SSBC.
8. The Council is keen to re-establish and continue its collaborative working relationship with Waka Kotahi through the SSBC to maximise the opportunities and benefits of the proposal and minimise the social, environmental and financial impacts on the Council's local network.
9. The SH76 Brougham Street Upgrade Project does fulfil some of the outcomes sought from the SSBC, and Council supports these as follows:
 - Improving safety for all users along Brougham Street who compete to travel through and around the same spaces, through slower speeds, and intersection improvements;
 - Better travel choice through providing different and safer ways to travel to get around Brougham Street and the nearby areas using all modes of transport, such as walking, cycling, buses, trucks and vehicles through enhanced infrastructure;
 - Making use of existing road space to move more people more safely;
 - Provision of a more reliable freight route through to Lyttelton Port; and
 - Aiming to reduce the impact of travel on the environment.
10. In addition to the specific transport outcomes of the SSBC, an integrated land use / transport approach sought greater recognition of and alignment with Council's strategic direction and priorities.
11. There have been several significant initiatives since the SSBC began, which should be considered as part of any proposal for this corridor. These include the following:
 - The Council has adopted Kia Turoa tea o / Otautahi Christchurch Climate Resilience Strategy 2021, which has an aspiration of reducing greenhouse gas emissions by 50 percent by 2032, particularly through reduced transport emissions;
 - Central government has committed to, and issued direction for residential intensification through the National Policy Statement on Urban Development (NPS-UD) and changes to the Resource Management Act; and

- The Council and its strategic partners have published Our Space 2018-2048, which outlines how and where Greater Christchurch can grow. Work is also progressing on updated spatial planning for the city and the wider Greater Christchurch area through the development of the Otautahi Christchurch plan and the Greater Christchurch Spatial Plan.

SPECIFIC COMMENTS

Land use context

12. The Council considers that the proposals in the SH76 Brougham Street Upgrade Project do not adequately consider the impacts on land uses in the adjoining suburbs, the opportunities for, and challenges of, increased and future development changes. As noted above, the SSBC did consider the significant land use and transport challenges for the Brougham Street and Moorhouse Avenue area. The Council considers that the exclusion of land use considerations from the proposed SH76 Brougham Street Upgrade Project is to the project’s detriment.
13. By way of background, SH76 Brougham Street bisects some of the oldest residential neighbourhoods and industrial areas of Ōtautahi Christchurch. These neighbourhoods, including Sydenham, Spreydon, Waltham and Addington, are within walking distance of the central city and have established commercial areas, communities and facilities, and affordable and social housing. Further suburbs in close proximity, including Somerfield, are also undergoing change, and will be impacted by intersection changes and consequent changes in traffic movement, which may be detrimental. The design of Brougham Street in conjunction with the increase in traffic volumes of SH76 Brougham Street over the years has created a significant psychological and physical barrier to the continuity of movement, activities and landscape values, across the corridor, as well as to the quality of life along its length.
14. Sydenham, Spreydon, Waltham and Addington currently house approximately 17,000 people with this increasing with residential intensification. Dependent upon the extent of future land use changes, there is also significant development potential in these areas for mixed use and innovative forms of development, of which there are already examples, which would further increase residential and commercial capacity in these neighbourhoods.



15. More specifically, the proposal risks either exacerbating current impacts or resulting in further impacts for example:
- Nuisance effects including noise, vibration and emissions resulting from the transport corridor and increased traffic movement in closer proximity to residential dwellings;
 - Visual and physical impacts of the required gantries and associated infrastructure;
 - Limited provision of amenity and/or mitigation including tree and garden planting; and
 - Impacts on property access and use.
16. Area-wide improvements to amenity and connectivity, and providing greater transport choice, in conjunction with land use changes, could significantly increase residential demand and active transport take up. This would further increase the Central City/Fringe residential catchment, while supporting and connecting to neighbourhoods south of Brougham Street.
17. Transformation of this area, including through residential intensification supports transport and climate change objectives by providing increased commercial capacity and more desirable residential living, reducing the need for longer commutes and creating '15-minute neighbourhoods'. This supports the Council's strategic priorities, particularly the priority of 'meeting the challenge of climate change through every means available', and contributes to other Council strategies, plans and policies. Incorporating land use planning with transport planning also gives effect to central government policy relating to housing (Resource Management (Enabling Housing Supply) Amendment Act 2021) and climate change commitments.
18. Council is making and has made a strong commitment to its community through this work and would like to see the final design of the Brougham Street proposal achieve greater fit with the city's intensification and emissions reduction objectives. We request Waka Kotahi explores options with Council to reduce severance, increase amenity, public transport and active travel opportunities and overall liveability, while mitigating impacts of private vehicle use within this southern end of Christchurch city.

Tree Planting

19. The Council strongly supports the intent to plant trees along the shared path to denote the different corridors, increase safety, and provide shade. Trees are an important inclusion, and should be treated as essential infrastructure. Council would welcome the opportunity to work with Waka Kotahi in relation to the location and type of trees that are included along the corridor.

Integration with Council's local networks

20. Part of the success of the SH76 Brougham Street project is reliant on the Council making changes to its local network. Assurance is required by the Council that the SH76 Brougham Street Upgrade Project is integrated with planned repairs and renewals to adjacent streets, to ensure synergies are maximised. The Council requests Waka Kotahi take a collaborative approach with the Council in phasing the SH76 Brougham Street Upgrade Project.
21. The Council's experience of the Christchurch Northern Corridor / Downstream Effects Project was that ratepayers were burdened financially (amongst other adverse impacts) as a result of the CNC implementation, due to the need to bring local network projects forward to address these impacts. Under the current funding framework, the Council believes that many local projects would not be eligible on their

own merits for funding assistance, and wishes to ensure that it minimises the impact on its ratepayers from consequential impacts of this Waka Kotahi project. This may be a case of reviewing how the Investment Decision Making Framework (IDMF) is used currently and where changes may be needed to ensure that impacts to the local network can still be eligible for assistance.

22. The Council requests the provision of additional funding from Waka Kotahi to assess and respond to the breadth of the impacts of the SH76 Brougham Street proposal, which may include bringing forward planned work in adjacent streets, which is not currently funded. Given that any work required on surrounding streets has been required because of the SH76 Brougham Street Upgrade project, the Council requests Waka Kotahi consider an increased FAR for this work so as to not unreasonably burden the ratepayers of Christchurch.

Pedestrian Overbridge

23. The Council supports providing safe crossing points for pedestrians and cyclists, and want to be involved with the design for the proposed overbridge to ensure it is accessible to all users, including the young, the elderly and mobility impaired. The Council also need to understand the implications of the design on the receiving environment of the associated residential streets, including any Crime Prevention through Environmental Design (CPTED) issues, and ensure that they are effectively addressed in the design outcome.

Speed Review

24. Council supports the review of speeds along SH76 Brougham Street to ensure a safe operating environment for all users, and supports the reduction in speed, which is consistent with Council's policies to reduce speeds, improve safety for all users and work towards the outcomes identified in Road to Zero.
25. The Council is keen to ensure that provision has been made for speed enforcement to assist in achieving the safety outcomes desired, and suggest that Waka Kotahi includes ongoing speed limit enforcement, in particular during non-peak conditions, as part of its planning and funding to achieve this outcome.

Shared Path

26. The Council supports the shared path proposed on the southern side of SH76 Brougham Street, but is concerned that it may not be wide enough for pedestrians and cyclists to safely travel alongside one another or in opposing directions. The Council acknowledges that Waka Kotahi is seeking to upgrade Brougham Street within the existing available road space, but where possible, would encourage a wider shared path, which also takes into account other impediments such as lighting and signage infrastructure, utility boxes, and so forth. It should also be noted that there are safety considerations associated with property access and cycle movement in close proximity.
27. There does not appear to be sufficient provision for commuter cyclists in the proposal. This type of cyclist is unlikely to use the shared path, which is generally aimed at recreational and/or less confident cyclists. The Council would like assurance that there be provision made for on-road cycle lanes that will meet the minimum standards of 1.8m width to ensure the safety of both cyclists and vehicles.

T2 lanes

28. The Council understands that Waka Kotahi has considered several options for a managed lane through the SSBC. The Council request that Waka Kotahi reconsider the length of the T2 lanes within the Brougham Street proposal including the feasibility study of a managed lane extending out to the Christchurch Southern Motorway (CSM). Council would like to see this funded within Waka Kotahi's work programme as a long term project to bring about a change in travel behaviour. A reduction in the number of single occupant vehicles (SOV) travelling to and from the Selwyn District would help to bring about a decrease in greenhouse gas emissions – a key strategic objective – as well as understanding the impacts on the existing network through better analysis of destinations for Brougham Street users other than the Port.
29. Council conditionally supports the T2 lanes to prioritise high occupancy vehicles (HOV) and buses during the AM and PM peak period if these are extended out to the CSM. Whilst the current proposal will improve journey times for all road users, it will only provide minimum journey time incentives to support the intended mode shift.
30. Council notes that the T2 lane would revert to parking spaces, in some locations, when not in operation, which is supported.
31. Council believes that ongoing enforcement of the T2 lanes is important to ensure that these are successfully implemented and provide the outcomes sought, including a change in travel behaviour from SOVs to HOVs. The Council is keen to understand what enforcement is proposed as part of this project's implementation and ongoing operation.
32. Council is concerned that there is no direct improvement for freight under the proposal, especially at peak times. Council does not want to see freight vehicles using the local road network and rat running adjacent to Brougham Street, to avoid delays and queues, where they could be using Brougham Street – a key freight link to the Port.
33. An additional long term project to consider the requirements for effective and efficient movement of freight is also necessary to ensure the opportunities for the rail network are maximised. Council also encourages Waka Kotahi to advocate for bulk freight to be transported by rail, rather than heavy vehicles on the road as a longer term project, which is consistent with RTC goals.
34. Council would like to see Waka Kotahi have projects on programme to further develop options for managed lanes along CSM to support long term climate change goals of mode shift and reducing single occupancy journeys.

Intersection upgrades

35. The Council is supportive of the introduction of traffic signals at Montreal Street, and the ability for more green time for north / south traffic movements to be provided.
36. However, Council is concerned that there is no right turn movement available onto Selwyn Street, which will lead to rat running occurring on adjacent streets locally, and increased conflict between vehicles and cyclists on the adjacent routes which include the existing Major Cycle Routes. Council is concerned for the safety of all users on the local roads, which include vulnerable users such as school children accessing their local schools.

Crossings

37. The Council supports the proposal to add new pedestrian crossings. We would advocate for further full single stage crossings and for further crossing points to meet pedestrian demand and desire lines. For example, there is high pedestrian demand at Selwyn Street and Colombo Street, but there is no proposed pedestrian crossings as part of the current proposal at these locations. Conversely there is a signalised pedestrian crossing proposed at Wilsons Road, but Council would like to understand the justification and demand for the crossing at this location.
38. The Council would also like to see a Waka Kotahi project initiated to assess the safety of the entire corridor, including pedestrian safety in crossing Brougham Street, such as in the area of Garlands Road and Opawa Road, where it intersects with Brougham Street.

Intersection closures, cul-de-sacs, raised safety platforms

39. The Council is unsure of the impacts on the adjoining local streets and neighbourhoods and would welcome the opportunity to work with Waka Kotahi to understand these impacts before confirming its support for the proposed changes on different traffic flows, infrastructure requirements and working with these communities to adjust to the proposed changes.
40. Council proposes that Waka Kotahi allocates funding within its budgets to help understand the impacts of the Brougham Street proposal on the local network, including confirmation of projects already identified in the SSBC and what has been programmed into Waka Kotahi's forward work programme.

COMMUNITY BOARD FEEDBACK

41. In addition to the Council's input, the Linwood-Central-Heathcote Community Board, and the Spreydon-Cashmere Community Board have expressed their own views and provided input into the proposal. Their feedback is attached to this Council submission.

CONCLUSION

42. Council considers that the greatest impact of this proposal on working towards climate change objectives is through the extension of the proposed T2 lanes beyond the current proposal and for guaranteed funding for enforcement of the T2 lanes.
43. The Council want to ensure the downstream effects of this proposal on the local network and consequential changes to the local network are included in Waka Kotahi's total project cost. The success of the SH76 Brougham Street project is reliant on the Council making changes to its local network. The Council does not want these costs to fall on the ratepayers of Christchurch, as has occurred with the CNC project.
44. The Council requests Waka Kotahi to include projects within its programme to address safety along the entire SH76 Brougham Street corridor, and in particular pedestrian safety; enforcement of the T2 lane; extension of a managed lane along the CSM to Selwyn; and encouraging bulk freight to move from heavy vehicles on the road onto rail.

45. Thank you for the opportunity to provide this submission. For any clarification on points within this submission, please contact Kirsty Mahoney, Team Leader, Asset Planning Transport (kirsty.mahoney@ccc.govt.nz or 03 941 5330).

Ngā mihi



Lianne Dalziel
MAYOR

Attachments:

A - Linwood-Central-Heathcote Community Board – Feedback

B - Spreydon-Cashmere Community Board – Feedback

Attachment A - Linwood-Central-Heathcote Community Board – Feedback

WAIKURA LINWOOD-CENTRAL-HEATHCOTE COMMUNITY BOARD

The Waikura Linwood-Central-Heathcote Community Board wish to make the following comment on Waka Kotahi NZ Transport Agency – State Highway 76 Brougham Street Upgrade to be considered for the Christchurch City Council’s submission.

The Board have noted concern with Waka Kotahi NZ Transport Agency that there was no drop in session in the affected Board area. Addington is quite a way to travel from Ōpāwa.

The Board supports the removal of the sliplane at Shakespeare/Brougham Street intersection and the installation of a dedicated left hand turn at the signals.

The Board have recently made a submission on the Environment Canterbury’s Public Transport Routes 17 and 28. In that submission the Board requested that route 28 not divert off Brougham Street to travel along Shakespeare Road. By going down Shakespeare Road this will miss a low social economic area and two social housing complexes. The Board suggested that Bus Route 28 continue along Brougham Street and make a right hand turn at Gasson Street then onto Ara, Madras Street shopping complex and onto the central city and that the current bus stops to service the Board proposal remain. To support the submission the Board supports a dedicated right hand turn from Brougham Street into Gasson Street (coming from the port).

The Board question why no left hand turn at the Colombo/Brougham Street when travelling from the port. As outlined in the proposal there is a left hand turn at Burlington however if motorists wish to go to the retail area e.g. MacDonalds, Subway, or Fish Supply on Colombo Street they would need to do a wide loop from Burlington, turn right then if going to Funky Pumpkin etc off Colombo Street with a high traffic volume. Motorists may decide to use the smaller residential streets. (Hastings Street West and Walton Street via Hastings Street) and return to Burlington.

The Board discussed the new signalised lights at Montreal Street; giving east to west traffic a safe right hand turn, however the Board are concerned that motorist caught in the long tail of peak time traffic from the Durham Street overbridge to Brougham Street will “rat-run” down suburban side streets to get onto Montreal Street to turn onto Brougham Street.

The Board questions if T2 will actually work; the transport on Brougham Street is trucks and shift workers that public transport does not work for. e.g. port workers.

The Board supports the intended planting.

Attachment B - Spreydon-Cashmere Community Board – Feedback

WAIHORO SPREYDON-CASHMERE COMMUNITY BOARD

The Waihoru Spreydon-Cashmere Community Board thanks the Council for the opportunity to provide input to its submission on Waka Kotahi's Brougham Street upgrade.

- We have heard from Addington School and local residents on numerous occasions about serious safety concerns with the current pedestrian and cyclist crossing at the Brougham / Simeon/Collins Streets intersection. We strongly support the proposed overbridge for pedestrians and cyclists, provided that it meets the best possible standard for accessibility and ease of use for older and disabled people and the community has input into the design. This aligns with our Community Board Plan priority to progress the cycle network.
- We support the proposed T2 lanes to move more people in fewer vehicles at peak times, which aligns with our climate change goals.
- We support the proposed shared path on the south side of Brougham Street as this will promote more and safer walking and cycling, which aligns with our climate change goals and Community Board Plan priority.
- While we acknowledge that the proposed no right-hand turn from Brougham Street onto Selwyn Street would increase pedestrian safety, this would divert motorists onto Council-owned roads such as Barrington and Strickland Streets. Similarly, the proposed no right-hand turn from Brougham Street onto Burlington Street would divert motorists onto Colombo Street and Strickland Streets. As some of these roads have been prioritised for other users, such as buses (Colombo Street) and cyclists (Strickland Street), the traffic impact from motorists needs to be managed. We are concerned that Waka Kotahi is pushing traffic onto smaller, Council-owned roads without an understanding of what the safety impacts will be. As the Council does not currently have budget in the Long Term Plan for this, we suggest that Waka Kotahi provides partial funding for these projects.