

2 April 2024

Ministry of Transport
3 Queens Wharf
Wellington 6011

03 941 8999

53 Hereford Street
Christchurch 8013

PO Box 73013
Christchurch 8154

ccc.govt.nz

Email: 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 (GPS).
2. Striking the right balance in considering both the needs of today's residents alongside those of future generations is a key priority for the Council. From a transport perspective this includes: looking after our assets and developing a more resilient network; prioritising wellbeing, accessibility and connection for our residents and visitors to our city; and reducing transport emissions alongside investing in adaptation.
3. Our residents also have strongly held views about what's important to them. A recent survey to inform the development of our 2024-34 Long Term Plan (LTP) shows clearly that climate change, improving footpath and road condition; and having good transport options are in the top five things that matter most to our residents.
4. The Council welcomes a number of the directions in the draft Government Policy Statement that align well with our own strategic priorities. We agree that the transport system plays a critical role in economic growth and productivity in our city. In line with this, we invite the Government to invest in Christchurch and the Canterbury region through the National Land Transport Programme (NLTP) at a level commensurate with our national economic contribution.
5. We are also strongly supportive of the increased strategic focus on maintenance and resilience; the focus on value for money and exploration of a broader set of funding and financing tools; and the strengthened focus on road safety compliance and enforcement. The directions in the GPS to align longer-term investment planning cycles and the proposed review of NZTA business case processes are also warmly received.
6. There are elements in the GPS that the Council is concerned about however. In particular, the lack of recognition for strategic Christchurch and Greater Christchurch transport projects in the GPS and the missed opportunities that this represents to achieve both economic and resilience outcomes from the investment programme. Specifically in our submission, the Council requests that the **Greater Christchurch Public Transport Futures and Mass Rapid Transit** project and **Pages Road Bridge Renewal** project are included in the Canterbury investment programme.
7. We are also concerned about the strong state highway focus in the GPS which we believe comes at the expense of consideration of the economic and broader contribution of the local road network and getting the best outcomes for the mix of road users that move around on it every day. In particular, public transport and walking and cycling networks are a core tool for congestion management in our cities. They are also important

transport options for inclusive access for all ages and abilities and for the climate change response strategy for our city.

8. To address this concern, we request that the Government re-considers:
 - a. the balance of investment in the Walking and Cycling and Public Transport Infrastructure and Services Activity Classes; and
 - b. the level of prescription and reduced investment outcome flexibility from ring-fencing in the proposed Activity Class descriptions.
9. The Council is also disappointed to not see any reference to the Te Tiriti partnership in the GPS. As members of the Greater Christchurch Partnership, Ngāi Tahu Papatipu Rūnanga have identified their priorities and expectations as part of our recently adopted Greater Christchurch Spatial Plan. This includes the development of kāinga nohoanga on Māori land supported by infrastructure and improved accessibility. Transport is a critical component of this aspiration.

Submission

System Reform

10. The Council supports the intent of the system reform package, in particular:
 - a. the focus on amending the Land Transport Management Act to require future GPS to adopt a 10 year investment plan; and
 - b. developing more sustainable funding and financing models for investing in land transport infrastructure.
11. Bringing the GPS investment plans in line with Council Long Term Plan (LTP) cycles is particularly welcomed by the Council. This will allow greater certainty of planning for both Council and our private sector contractors.
12. The Council looks forward to working closely with the Government as it develops its long-term infrastructure plan and providing comment on the planned reforms to the National Land Transport Fund's revenue system. We are particularly supportive of the proposal to transition all vehicles to the Road User Charges (RUC) system as this has the potential to result in more equitable outcomes across vehicle classes.
13. The Council welcomes the review of road tolling and congestion management legislation. While we do not currently experience the same congestion management issues as some main centres, as our population and that of our surrounding districts grows, having more flexible congestion management tools available will be of great value.
14. We note reference to the development of a second Emissions Reduction Plan and the retention of the net-zero by 2050 target for the economy. At 38% of total emissions, land transport is the largest contributor to the Christchurch District's emissions profile. We welcome the focus on doubling renewable energy and recognition of the role that improved public transport will play to reduce emissions. Transitioning the vehicle fleet and providing genuine transport choice is a critical component of our transition to a zero-carbon transport system. While we welcome the focus on delivering 10,000 public EV chargers by 2030, the Council notes that additional policy incentives may also be required to transition the fleet at the pace required to meet the 2050 target.
15. We are concerned about the removal of climate change as a strategic priority. Modelling undertaken by the Council to support our own transport emissions reduction planning suggests that much more will be required to meet 2050 target. For example, connected active transport networks; focusing growth around centres and along public transport corridors and the development of a more compact urban form. We support the

reinstatement of climate change as a strategic priority.

16. These interventions also play double duty in meeting the GPS's productivity and congestion management outcomes. We look forward to discussing this further with the Government as it develops its refreshed Emissions Reduction Plan.

Strategic Priorities - Economic Growth and Productivity

17. The Council strongly agrees that the land transport system is a critical enabler of economic growth and productivity.
18. Christchurch City now accounts for 8.6% of national GDP. As the second largest city in the country, we have experienced high population and economic growth since the Canterbury Earthquakes. Christchurch is the gateway city to Antarctica and the South Island, as well as being a destination City in its own right. The value of international visitor spending reached a new monthly record of \$46.1 million during December 2023. Reflective of this Christchurch's economy is comparatively buoyant. We experienced 2.4% growth in the year to September 2023 on the previous year, compared to the national economy expanding 1.7% over the same period.
19. Approximately 80% of the Canterbury regional population and 40% of the South Island population, live in Greater Christchurch (encompassing the Christchurch city, Waimakariri and Selwyn Districts). The resident population of Greater Christchurch is set to increase from 489,000 to over 641,000 by 2048.
20. Along with our Greater Christchurch partners we have recently developed and adopted a Greater Christchurch Spatial Plan. The plan sets out a desired urban form and provides a shared blueprint for future growth across the sub-region. From a transport perspective, focusing growth along public transport corridors and transforming our public transport system is a central component of our shared plan.
21. We also note the recent direction from the Minister Responsible for RMA Reform to continue implementation of the NPS-UD through the enablement of intensification around centres and MRT corridors. Ensuring that the transport system is developed in parallel will be critical to managing the potential for future gridlock.
22. The Council supports submission points made at the regional level concerning the historical share of NLTP expenditure compared to regional economic contribution. Namely, for the 2021-24 period, Canterbury received just 5-8% of the forecasted National Land Transport Programme (NLTP) expenditure. This is despite our region representing approximately 12% of New Zealand's population, contributing 12% of national GDP and having over 16% of the national roading network. We also know that our capacity for growth is relatively high, hence our ability to contribute to national growth needs to be considered as well.
23. In this context, we would expect to see future NLTP expenditure more commensurate to the economic contribution of both our city and wider region.
24. The Council is pleased to see the inclusion of a Canterbury Package as a starting point. We understand this includes the projects previously under development through the NZUP fund. This includes the Halswell Road project, Rolleston Access enhancements and the Brougham Street freight corridor enhancements. Brougham Street is one of the core state highway routes through our city and it plays a central role in carrying on-road freight to the Port of Lyttleton. This is a critical freight route for our region, and we strongly support it and the other projects stated as ongoing priorities.

25. The Council has some additional issues we wish to raise regarding this strategic priority that are expanded on in following sections, including:
- the absence of public transport priorities outside of Auckland and Wellington
 - the broader economic, social and cultural roles that walking and cycling play on city networks
 - the narrowing of geographic focus for stated rail priorities and potential for dis-investment in rail.

Public Transport

26. The Council welcomes the focus on public transport projects to ‘reduce congestion and unlock the potential of our main cities’. The Greater Christchurch partners have a well-developed public transport investment plan that is aligned with our sub-regional urban growth plan. If progressed, it will enable this city to effectively manage its ongoing growth in a way that other cities have not.
27. We are concerned therefore, to not see any reference or prioritisation in the document to our strategic public transport initiatives: Greater Christchurch Public Transport Futures and Mass Rapid Transit. The GPS does not accurately reflect the criticality of these projects to achieving a more compact urban form and reducing congestion in Greater Christchurch.
28. We also caution against un-intended consequences from opening up additional greenfield housing development in the Greater Christchurch sub-region without supporting investment in public transport. Recent experience from post-quake greenfield development within Christchurch city illustrates that adequate investment in public transport expansion lags urban greenfield growth.
29. There has historically been very low levels of Government investment into Christchurch’s public transport system compared to Wellington and Auckland. As such, we currently have low levels of comparative public transport patronage. On the upside, demand is increasing with passenger numbers now surpassing pre-Covid levels. Business planning undertaken to date to develop a strong foundation for PT also shows substantial opportunity to reduce travel time and reliability across the network through PT infrastructure treatments alongside a planned service uplift by our partners Environment Canterbury.
30. A Mass Rapid Transit indicative business case (IBC) for Greater Christchurch has also 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. It is clear from the completed IBC that Mass Rapid Transit may well have equal impact for Greater Christchurch as the City Rail Link and North-West Rapid Transit projects will for Auckland at significantly lower cost.
31. We have a narrowing window of opportunity to deliver Mass Rapid Transit in Greater Christchurch at a cost that is net positive for government. There is no more cost-effective time to undertake this work and it requires the commitment of all partners to progress it with some urgency.

Cycling and walking

32. Improving footpath condition and the provision of travel choices are in the top five priorities for Christchurch residents.
33. Christchurch is now the leading cycling city per capita in New Zealand. With our flat topography, Christchurch has unique advantages amongst our major cities for cycling and active transport. Getting around by cycle or scooter can be the fastest and most efficient way of moving around our city. With over 60% of our Major Cycle Network (MCR) completed, we have recorded strong growth in cycling as the cycle network has been rolled

out, with a 40% increase in cycling trips between 2017-2023. The MCR is already having a positive impact on congestion management and is projected to result in around 14,000 fewer vehicle trips on our road network each day when it is completed.

34. In developing the business case for the MCR, the Council also notes the broader economic contribution from investment in cycle infrastructure. Notably, of the \$8 of benefits identified for every \$1 invested for this project, 66% of cost savings were linked primarily to health benefits from reduced morbidity and mortality rates, followed by 28% in decongestion cost reduction benefits.
35. The economic growth and productivity approach in the current draft of the GPS is firmly linked to the movement of people and freight. The Council agrees that this is a critically important component but feels that there is a gap in the current draft. This gap relates to the role that place-making in local roads and streetscapes has in creating economic growth in our cities. This will continue to be of critical importance as our cities become more intensively developed and street spaces increasingly become 'living spaces' for our residents.
36. The Council's recent experience in implementing its post-quake recovery *An Accessible City* transport plan is a great example of this. Through taking a balanced approach to prioritising different types of movement through the central city (for both car travel and public and active transport converging on the centre) and investing in shared paths and streetscaping around our hospitality, retail and river precincts, our central city is now buzzing with life and attracting increasing numbers of residents and visitors.
37. We look forward to co-investing with the Government on the submitted business case for next stage of the central city transport plan focused on improving the streets around the Te Kaha multi-use arena now well under construction and on-track to meet its targets. This state-of-the-art arena will further boost the city's economy by attracting visitors from around New Zealand and the world to sporting and cultural events.
38. All transport users contribute to the NLTF via RUC, fuel excise or general taxation. Alongside public transport; cycling and walking are the most accessible ways of travelling for all of our residents. This includes school children travelling on the network; people with disabilities; older residents who no longer drive and those that don't have access to private vehicles. 7% of households in Christchurch have no car and 13% of adults do not hold a current driver's license. Ensuring inclusive access to economic, social and cultural opportunities on our transport network requires investment in a range of genuine transport options.
39. See related comments below on the proportion of funding allocated for cycling and walking and the ring-fencing of active transport improvement funding and maintenance into one significantly reduced activity class. *[see paras 72-76 below]*

Rail and freight connections

40. The Port of Lyttelton is the largest port in the South Island. In 2023 the port reported that it moved \$6.62 billion in imports and \$8.9 billion in exports. It is a critical import hub, handling 70% of all imports into the South Island. The inter-connected system moving freight by rail from the in-land ports: Midland Port in Rolleston and City Depot in Christchurch is critical to the efficient operating of our local freight system alongside the movement of on-road freight on the state highway network. We note also that moving heavy freight on the rail network is an important congestion management strategy to reduce heavy vehicle movement and its associated maintenance costs on our road network.
41. The geography of the port and its location the other side of the Port Hills, also presents specific accessibility and hazard management challenges. Ensuring freight accessibility via multiple access points and modes is a

critical resilience planning consideration.

42. As such, we are concerned to see a narrow focus within the document on the role that rail plays in moving goods between Auckland, Hamilton and Tauranga and a lack of recognition of the critical role that it plays in the wider national freight network. The Council also notes the potential for significant dis-investment in rail signalled by the lower funding range of the Rail Network activity class from year 3 onwards in the draft GPS. Given its critical and complementary role in the efficient movement of goods within our freight system we would be concerned to see funding levels drop to this extent.
43. The Council also notes the importance of the Cook Strait ferry to the South Island freight system and economy and would appreciate an update on revised plans for this critical infrastructure asset.

Strategic priorities: Increased maintenance and resilience

44. Maintenance of our current assets is a primary concern and focus for the Council, our residents, and for the wider region. Looking after what we've got is a core component of our infrastructure strategy.
45. The Council therefore 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.
46. The condition of our roading network, including pothole management and road renewals is of high importance to our Council and residents. The Christchurch road network still requires significant rehabilitation and renewal in some areas as a result of the Canterbury Earthquakes. Having additional funding available for our local road maintenance and renewals programmes is therefore very much welcomed by the Council.
47. We also support the reinvigoration of the Road Efficiency Group with its focus on standardising maintenance protocols and the proposed proactive maintenance approach. We note the inclusion of more ambitious targets for state highways maintenance, namely the intention to renew the Network Outcome Contracts with a focus on achieving long-term maintenance outcomes of 2 percent rehabilitation and 9 percent resurfacing per year. This is higher than our current 5 percent target for our local roads. If these targets are replicated for local roads this will require a revision to our proposed LTP programme to achieve.
48. We request a clarification on local road rehabilitation and re-surfacing targets in the event that we need to revise our investment programme.
49. Ensuring the ongoing resilience and adaptation of our transport network in response to hazard and climate change risk is also a shared priority. Like other Council's around New Zealand, CCC is experiencing increasing costs in response to the growing frequency of extreme weather events. This is manifesting in a number of ways, notably, slips affecting Banks Peninsula roads following extreme rain events and the impact on the roading network from our recent Port Hills fires.
50. We estimate that our reactive operational costs to deal with such extreme events are roughly 50% higher than pre-emptive renewals and replacements. The more proactive we are enabled to be, the more cost effective our ability to respond will be as a Council. Our maintenance teams have been investigating and testing new materials and approaches (such, as emulsion technology, reinforced asphalt; and marginal fills) to better manage these challenges. We look forward to implementing a more proactive focus to investing in these types of innovative solutions and the flow on benefits to whole-of-life asset costs.

51. In this context, the Pages Road Bridge project is the Council's top-ranked resilience transport project. This bridge is a critical lifeline route if a catastrophic Tsunami event were to occur on the Hikurangi Trench off the coast of Kaikoura. If a large-scale event were to eventuate New Brighton residents would have a very limited window, approximately one hour, to evacuate safely. This project is designed to significantly improve egress and therefore reduce loss of life risks. It also delivers core infrastructure services back to the New Brighton community in the event recovery phase.
52. Due to its regional significance and risk profile, we request the Government includes the Pages Road Bridge Renewal project as part of the Canterbury Package noted in the Major Transport Projects list.

Strategic Priority: Safety

53. Keeping Christchurch residents safe on our roads and reducing deaths and serious injuries on our transport network is a core priority for the Council. Requests from our communities for speed reduction and traffic calming on local streets and around schools is a consistent theme across our city.
54. The Council welcomes the continued commitment to reducing the road toll. We support the increased focus on compliance and enforcement in the draft GPS. We have a strong partnership and shared road safety programme with the NZ Police and our neighbouring local authorities and a skilled team within Council working with local communities and schools on road safety education. We agree that improving driving skills and addressing risk-taking behaviours are important features of a road safety strategy.
55. While supportive of the direction to deliver improvements to level crossings, we caution against the assumption that Council's have the financial capacity to share costs with NZTA and KiwiRail's RNIP. This has not traditionally been an area where financial contributions have been expected of Councils and we have not budgeted for this in our LTP.
56. We are concerned by a disproportionate focus on state highway safety interventions in the GPS compared to local roads (such as, reference to bypasses and rumble strips). A high proportion of the road toll will continue to be found on local roads (rural and urban).
57. From our own experience, contributing factors in crashes resulting in death and serious injury on Christchurch roads shows a complex, multi-faceted problem. The top five factors identified in 2022 were poor observation, failure to give way or stop, alcohol or drugs, travel speed and poor handling. This illustrates the point that alongside traffic offences, human error more generally plays a pivotal role in the crashes that are occurring on Christchurch local roads.
58. We also note that a different mix of infrastructure treatments, such as, traffic calming infrastructure, are required on local roads to improve safety given the different mix of road users. We would welcome further discussion of the safety issues and treatments best suited to local road environments as the Government further develops its road safety policy direction.

Strategic priorities: Value for Money

59. The Council is strongly supportive of taking a value for money approach to land transport investment. This aligns closely with the Council's strategic priority to 'manage ratepayers' money wisely'.
60. We are very supportive of:

- a. the proposal to reduce expenditure on temporary traffic management, while maintaining safety of workers and road users (while noting that care will need to be taken to simply not pass on the risk and therefore, costs charged back from roading contractors)
 - b. the focus on outcomes in road maintenance to deliver reliable journeys for New Zealanders
 - c. making better use of existing assets by allowing time-of-use charging or the use of dynamic lanes in main cities to manage demand; and
 - d. the focus on whole-of-life costs to maximise long-run value (while noting the trade-off between upfront costs and whole-of-life outcomes).
61. The Council does see potential in further generation of advertising revenue from bus infrastructure. We are concerned however, that the direction to increase public transport fare box recovery will result in inequitable outcomes for lower income transport users. Increases in public transport fare costs could run counter to the dual outcome sought to increase patronage in public transport.
62. A broader set of revenue gathering tools from enforcement activities could also be considered in the GPS, we note the following additional opportunities:
- a. Low parking infringements are not acting as a sufficient deterrent to people parking and driving in bus priority lanes. Councils are also unable to pass on the real cost of towage charges. A review of the parking and towing financial penalties in the Land Transport (Road User) Rule and Transport (Towage Fees) Notice 2004 would be beneficial to make sure our existing PT infrastructure is able to achieve the travel time and reliability savings they were designed for
 - b. Further automation of road safety enforcement (such as, expansion of the speed camera network) and its revenue gathering and reinvestment potential is a gap that could be explored further; and
 - c. Alongside the proposal to reduce expenditure on temporary traffic management, consideration could be given to increasing fines for speeding in temporary speed zones alongside work zones.

Investment in land transport

63. We welcome the \$5.2 billion funding increase in the revised GPS 2024 and commitment to exploring new funding and financing approaches for the land transport system. As noted earlier in this submission, the increase in funding for maintenance and renewals is significant and overdue.
64. We do however, have some issues we wish to raise in this submission about the proposed investment approach relating to:
- a. Priorities for Canterbury in the Crown Investment Programme
 - b. Recognition of the distinct role and economic contribution of local roads; and
 - c. Funding levels, scope and flexibility across activity classes.

Priorities for Canterbury in Crown Investment Programme

65. The Council notes that the majority of projects in the Crown Investment Programme are focused on state highway expansion, through the re-introduction of the Roads of National Significance Programme.
66. The Council welcomes the proposed investment in the Canterbury Region, through the Canterbury Package (with the continuation of the Brougham Street and Halswell Road NZUP state highway projects as priorities for the city) and the wider regional focus through proposed investment in the Belfast to Pegasus Motorway and proposed Woodend bypass; and Second Ashburton Bridge.
67. We are however, strongly of the view that there is insufficient priority funding dedicated for Christchurch and the Canterbury region proportionate to its national economic contribution and hazard risk profile.

68. Due to their national and regional importance, the Council requests that the following projects are included in the Canterbury Crown Investment Programme:
- a. **Greater Christchurch Public Transport Futures and Mass Rapid Transit:** This critical public transport programme represents an opportunity to get ahead of the curve and invest in transport infrastructure in-line with projected population and urban growth. Its planning is well advanced, and it is well accepted by the local community.
 - b. **Pages Road Bridge Renewal:** This lifeline project will significantly improve the ability of a well populated coastal community in Christchurch to evacuate in the event of a catastrophic Tsunami event. It is a regionally significant resilience project.

Recognising the distinct role and infrastructure requirements of local roads

69. Local roads clearly have different mix of uses and users as compared to the state highway network. A core priority of the draft GPS is rightly focused on improving state highway outcomes. However, local roads require different infrastructure treatments than state highways to achieve the outcomes sought in the GPS.
70. We are concerned that the increased level of prescription in the Local Road activity classes will constrain metro Road Controlling Authorities from proposing treatments that could achieve the economic growth and productivity, safety and resilience outcomes sought in the GPS. For example, multi-modal improvements do act as effective congestion reduction interventions as evidenced by Christchurch's Major Cycle Network implementation and speed reduction and traffic calming infrastructure are effective and requested treatments to improve safety outcomes on local roads.

Activity Classes – funding levels, scope and flexibility

71. Managing congestion and enabling safe and efficient movement in our cities requires a balance of investment across all of our networks and ways of travelling. The Council believes that the draft GPS is missing an opportunity to achieve the outcomes sought by significantly reducing the funding available for Walking and Cycling and Public Transport Infrastructure and Services. We note with particular concern the drop-off in funding in year 2 and 3 of the for Walking and Cycling Activity Class.
72. The Council requests that the balance of investment in the Walking and Cycling and Public Transport Infrastructure and Services activity classes is increased in line with their critical urban transportation roles.
73. We also note the expectation that any activities funded through the Walking and Cycling Activity Class undertake 'robust consultation with community members and business owners'. While this is to be expected for improvement projects, we ask for clarification as to whether this expectation is also extended to, for example, BAU footpath or shared path maintenance which are also within the proposed Activity class scope.
74. We note also that there is now ring-fencing of funding for local road maintenance and renewals across the pothole prevention, local road operations and walking and cycling Activity Classes. This approach potentially curtails the ability to move funding between activities and raises potential difficulties with adjusting costs across activity classes for related investment. It also fails to account for renewal or rehabilitation projects that span the full road reserve.
75. The Council requests that further process clarification is provided and/or further integration is considered for maintenance and renewal activities across classes to enable efficient and effective contract management and

mitigate the risk of increased costs.

76. We note also that all structures renewals (including end of life bridge and structures renewals) and safety infrastructure are now classified as Local Road Improvements. The scope of activities within this class is very broad and the inclusion of significant renewal projects within its parameters raises investment dilution concerns and the risk for adverse safety and accessibility outcomes for Council in investment in local road improvements nationally.
77. The Council is appreciative of the increased investment in the Local Road Maintenance and Local Road Operations Activity Classes. However, the description of the scope of these activity classes appears to be narrower than the range of activities that RCA's undertake to maintain the full local road reserve. For example, structural retaining walls on hill roads. We request further clarification of the scope of activities funded in local road maintenance activity class scope.

Ministerial expectations

78. In addition to the other points made in this submission, the Council is strongly supportive of the proposal to review the Business Case development process in the Ministerial direction to NZTA. This process has become onerous, inefficient and overly expensive. The Council is encouraged to see a review proposed to create a more efficient and streamlined process as a priority. As part of the review of business cases, we note the importance of positive benefit cost ratios (BCR) for all large transport projects. We are of the view that a BCR of over 1 and demonstrated return on investment should be encouraged as part of this work. We look forward to engaging with NZTA further on this as the detail of the review process is developed.
79. The Council is strongly supportive of the direction for the Ministry and NZTA to integrate long-term strategy and planning across the transport system into city and regional deals between central and local government. As noted, the Greater Christchurch Partnership has already prepared an urban growth strategy that sets a strategic pathway for the region to form a basis for these discussions. We look forward to future discussions with Government Ministers and officials as this programme is developed.

Conclusion

80. The Council appreciates the opportunity to comment of the 2024 Draft GPS. We look forward to further discussion with Government and its agencies on achieving great transport outcomes for Christchurch and the Canterbury region.

For any clarification on points within this submission please contact Lynette Ellis, Head of Transport and Waste Management (Lynette.Ellis@ccc.govt.nz).

Yours faithfully



Phil Mauger
Mayor of Christchurch