

31 March 2017

GPS Policy Team
Ministry of Transport
PO Box 3175
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Dear Sir/Madam

**DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2018/2019 –
CHRISTCHURCH CITY COUNCIL COMMENT**

1.0 Introduction

Christchurch City Council welcomes the opportunity to comment on the draft Government Policy Statement on Land Transport Funding (the GPS). We have considered the document and make the following observations.

Key Points

In this comment Council raises the following key points on the draft GPS:

- The key priorities should include the social and environmental costs of investment, alongside economic growth.
- Travel demand forecasts are over-reliant on future Vehicle Kilometres Travelled (VKT) predictions and travel by car, which means investment is more focused on capacity building.
- Economic growth and productivity – there should be clear outcomes (or targets) for mode shift, with more focus placed on influencing and managing demand rather than increasing capacity.
- To help manage travel demand, the upper limits on the funding ranges for State Highway improvements should be reduced, and the ranges for walking, cycling and public transport improvements should be increased.
- Road safety – safety improvements can also be achieved by managing demand and providing transport choice.
- There should be an increase in the funding allocations for local road maintenance.
- There should be more ambitious targets for road safety in urban areas.

2.0 Specific Comments

Land Transport Context

Council supports the strategic direction priorities of economic growth and productivity, road safety, and value for money. However, economic opportunities can only be measured as one component of the country's triple bottom line. Motor vehicle travel in particular imposes considerable social and environmental costs, which need to be considered in the value for money equation. Infrastructure investments can last a generation which is why forecasting future scenarios is critical to the investment planning process. It is also important that land transport investments are reviewed thoroughly, and decisions are communicated clearly and transparently. Sometimes the decisions are complex, and involve thoughtful consideration of wider social and environmental factors, which is why Council recommends that they are considered alongside economic growth, as key priorities for the GPS.

The draft GPS uses VKT as the primary measure for travel demand. For several years VKT predictions have overestimated travel demand and its contribution to the Gross Domestic Product. A recent Ministry whitepaper¹ concludes that diverse, plausible futures must be explored to help support robust decision making. There are signs in a number of countries, including New Zealand, that economic prosperity is not as dependent on people travelling by car as it once was. The Ministry's own quantification models for 2042 estimate anything from a 35% increase to a 53% decrease in total VKT. Council recommends that the GPS more clearly acknowledge the variability in travel demand predicted over the next 10 years, and that the GPS funding is adjusted to reflect aspirational mode shift targets in all urban areas, not just Auckland.

The draft GPS has a significant disparity between State Highway and public transport investment. Spending on State Highways is proposed to be five times greater than that on public transport. The Council would like to see more balanced investment in order to substantially increase the number of people using public transport in urban centres. Currently, the level of service afforded to motorists is far beyond that given to public transport users and, without investment, urban residents will remain without viable transport alternatives. Public transport's purpose shouldn't be seen as primarily serving only those without access to a private vehicle. In urban areas, public transport is a vital necessity for developing urban form that creates thriving economic and social centres. This can happen only if public transport is an attractive alternative for everyone, not just for those who can't access a private vehicle.

3.0 Strategic Direction

Economic Growth and Productivity

As the key priority for GPS 2018, Council supports the Government's objective in addressing current and future demand for access to economic and social opportunity. However, there seems to be repeated conflation throughout the draft GPS between urban and rural outcomes without acknowledging that these will sometimes be in conflict with one another. Quantifying economic growth can be difficult, and it's important not to conflate increased demand for certain types of travel with a positive increase in GDP. Locally, Christchurch is mirroring the national trend of increased VKT, however GDP has slowed. Although population has only recently recovered to pre-quake levels, employment has risen 11%, meaning increasing numbers of workers commuting into the city are a result of growing traffic volumes on key State Highway routes². This contributes to an increase in vehicle kilometres travelled, but has not necessarily made the region more productive.

Vehicle travel is a necessary input in most economic activities such as delivering raw materials to producers, goods to markets, employees to work, and students to schools. However, it is critically important not to correlate increased volumes on the transport network with an anticipated rise in economic productivity, or vice versa. We do not consider that the 'predict and provide' model of transport planning is fit for purpose in the face of changing work and export earnings in the 21st century.

The overwhelming majority of vehicles on the road today are private, light vehicles, (i.e. cars). Increasing road capacity gives rise to increased demand (particularly for private vehicle travel); this in turn puts pressure on the existing network, fuelling justification for more capacity. In urban areas, the best way to avoid cyclical capacity building and induced demand is to actively influence and manage it. Although this is stated in the draft GPS, it needs to be more clearly emphasised as the preferred way to respond, rather than continually building more capacity into the network.

¹ <http://www.transport.govt.nz/assets/Uploads/Our-Work/Documents/fd-summary-report.pdf>

² CDC Quarterly Economic Update December 2016 (<http://http://www.cdc.org.nz/wp-content/uploads/2017/02/2016-Q4-Economic-Update.pdf>)

As a strategic priority, the draft GPS mentions increasing the capacity of the network and high-quality transport connections indicating a considered approach to all modes. However, the draft GPS isn't specific about the types of outcomes sought to increase or decrease volumes by each mode. Travel surveys show an overwhelming imbalance in the way people choose to move within our urban centres. A modal shift away from single occupant vehicle use is likely to achieve a growing and productive economy; however there is no mention of how mode shift will contribute to the key priorities for GPS 2018. Achieving a better mode-split can reduce capacity constraints on the network, and should be a priority for GPS 2018.

Increasing the capacity of the network is a heading under Economic Productivity. However, it is misleading and ambiguous. Council recommends that there should be a greater focus to increase the efficiency and effectiveness of the existing network by increasing the level of service for public transport and active modes.

Building redundancy into a system is a way to achieve resilience and avoid disruption when key links are affected by stresses and shocks. For the freight network in particular, this might require wider consideration of the intermodal role of rail and coastal shipping. For urban networks this is about providing a range of alternatives through integrated and dense land-use planning. One of the best ways to achieve transport resilience is strategically considered land-use planning to ensure transport links aren't unnecessarily dispersed. The more dispersed and spread-out origins and destinations become, the more precarious and vulnerable the land transport system becomes to stresses and shocks. To create a resilient system and to address future demand, Council would like the GPS 2018 to place a much great priority on a land transport system that provides people with a range of appropriate transport choices and alternatives.

The current mode splits in urban areas reflect the proportionate investment in the NLTF. Walking, cycling and public transport will continue to remain only a small proportion of urban trips if the majority of NLTF funding is directed into roads and highways. Council encourages the government to set funding ranges for these modes that reflect an aspiration for greater balance between these modes.

Road Safety

One of the objectives of the draft GPS is "a land transport system that increasingly mitigates the effects of land transport on the environment"³. The explanation that supports this objective makes reference to the Paris Agreement on Climate Change and the Energy Efficiency and Conservation Strategy. However, it is difficult to see how the current draft will achieve this objective in its current form given the emissions from road transport have continued to increase in recent years. In order to achieve meaningful reductions in CO₂ emissions, a greater share of funding will need to be allocated to walking, cycling and public transport. The GPS should make stronger reference to Government emissions reductions targets and be clear how investment will work to achieve them.

While behaviour is an important component of keeping roads and road users safe, an increase in road trauma is also associated with an increase in VKT. Managing demand on our roads also addresses the deaths and serious injuries on the transport network. However, increases in cycling and public transport tend to achieve a 'safety in numbers effect'. 2016 saw a significant increase in people cycling to work and education in both Christchurch and Auckland.⁴ Last year also saw the lowest number of cycling fatalities in 25 years. Therefore encouraging mode shift and reducing the number of vehicles on the road is an increasingly important component of improving safety.

³ Page 19 of the draft GPS

⁴ <https://at.govt.nz/cycling-walking/cycling-walking-monitoring/monthly-cycle-monitoring-report/>

Council encourages the Ministry to draw closer links between safety and value for money. Examining the macro costs of the transport network would likely see the social and public health costs stand out as a negative externality of transport investment. When investing in safety, these costs can also be reduced by managing demand and providing transport choices as well as by improving infrastructure.

While safety for vehicle drivers and passengers has been a focus of the Government's Safer Journeys Strategy, vulnerable road users such as pedestrians and cyclists are continually over represented in fatal statistics. Urban areas are a critically important area to focus efforts in reducing deaths and serious injuries. While they represent less than a quarter of the national network length, they carry 68% of the traffic volume and account for 40% of all deaths and serious injuries⁵. Several cities overseas have adopted a "Vision Zero" approach to urban traffic safety. Council recommends that the government go beyond the draft objectives to adopt a view that it can never be ethically acceptable that people are killed or seriously injured when moving within the road transport system.

Value for Money

As the funding levels for State Highways have significantly increased over the years, the respective Benefit Cost Ratios (BCRs) for each of these projects has been diminishing. This suggests that an increased investment in this activity class would result in poor value for money. Council recommends that the upper limits on the funding ranges for State Highway improvements should be reduced, and the ranges for walking, cycling and public transport improvements should be increased. The BCRs value for walking and cycling projects are typically higher than roading improvement projects, aligning with the value for money approach from the government.

In Christchurch, increasing public transport patronage has been identified as a critical component of the city's recovery and regeneration and its value is much wider than competitive tenders and commerciality ratios. While Council agrees that efforts to achieve value for money in public transport should be encouraged, there is concern that too much emphasis has been placed on achieving fare box recovery targets at the expense of service quality and the needs of residents.

Local road maintenance is of particular concern in Christchurch where we are facing a repair and renewals programme stretching decades into the future to return levels of service to pre-quake levels. Road assets are being stretched to meet budgetary constraints and as a consequence the city is expecting to invest heavily in renewing and replacing assets in the next 10-15 years. While State Highway expenditure has increased significantly over recent years to enable heavier and larger vehicles, these will pose a much greater burden on local authorities' assets requiring more regular maintenance and renewals. It is important that local authorities can address the lifecycles of their road assets now, so they do not face burdensome renewal scheduling in the future.

Accessing land for housing development is a challenge for high-growth urban areas. However, the GPS should encourage development that integrates with existing networks rather than requiring new connections to Greenfield development. In Christchurch, the recovery of the central city is a strategic priority. Modelling for the Central City Recovery Plan indicates a need for a threefold increase in the number of people walking, cycling and taking public transport into the central city. Creating these transport links to support inner-urban development and connect with surrounding areas requires corresponding investment in walking, cycling and public transport. Continuing to build new roads will create strain on the network and not meet the objectives of the recovery plan. Value for money in the context of

⁵ Safer Journeys Action Plan 2016 <http://www.saferjourneys.govt.nz/assets/Safer-journeys-files/Safer-Journey-Action-Plan-2016-2020.pdf>

Christchurch must take account of these wider economic benefits of recovery and regeneration.

Urban intensification also yields positively reinforcing cycles of economic activity and reduced strain on the road transport network. Emphasising an aligned land use and transport policy in the GPS would make this explicitly clear, and set a direction for subsequent RLTPs. Low density growth around urban fringes puts a significantly higher burden on the transport network than denser inner-urban development.

4.0 Concluding Comments

Christchurch City Council would like to thank the Ministry of Transport for the opportunity to provide feedback on the draft Government Policy Statement 2018 and would welcome a meeting to further discuss these points.

If you require clarification of the points raised in this submission, or additional information, please contact richard.osborne@ccc.govt.nz.

Yours faithfully



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