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RLTS Submission
Environment Canterbury
PO Box 345
Christchurch

23 September 2011

To members of the RLTS Hearings committee

Re: Draft Canterbury Regional Land Transport Strategy 2012 – 2042 – New Zealand Transport Agency Submission

Thank you for the opportunity to comment on the draft Regional Land Transport Strategy 2011 – 2042 (RLTS). The New Zealand Transport Agency (NZTA) supports the overall direction of the strategy, we offer some suggested minor amendments for your consideration as follows:

Integrated land Use and Transport Planning (Pages 23, 29, 32 and 34)

Page 23 of the draft RLTS addresses transport and land use integration. NZTA supports the recognition of the importance of integrated transport and land use planning within the RLTS. We agree with the acknowledgement on pages 29, 32 and 34 that District Plans are one of the statutory tools for achieving land use and transport integration. However we consider it is more appropriate as noted in Appendix G that it is the Regional Policy Statement (RPS) that is the primary resource Management Act document for setting the planning framework to achieve integrated land use and transport planning. Section 75 of the Resource Management Act requires that District Plans give effect to the Regional Policy Statement (RPS). Therefore, we consider that the RLTS should reference the RPS in on pages 29, 32, and 34.

We also consider there should be greater recognition in these tables of the opportunity to use non statutory planning mechanisms by Councils to forward-plan land use and guide District Plans.

We also consider the reference on each of these pages under the 'Long tem' assessment commentary should be amended to recognise it is not solely about 'implementing plans' – but the continual review and update of the planning documents as required.

Private costs (page 37)

We consider the strategy largely neglects the collaborative requirements of getting alongside developers to ensure optimal planning for and delivery of good transport outcomes is achieved. We consider the RLTS should advocate for local authorities to collaborate with land developers when opportunities arise to deliver these outcomes.

Safety

We acknowledge the RLTS has captured some of the threads of the New Zealand Road Safety Strategy – 2010- 2020 the Safer Journeys document. However we consider that the safe journeys approach of working with a safe system across all activities in the transport sector has not been captured through the document. We suggest consideration be given to specifically recognising the safe system approach to improving our regional road safety performance rather than treating the various opportunities for

improving road safety as being discrete. You could also consider incorporating the Safer Journeys logo into your document – see attached (but note you should confirm use of the logo with the Ministry of Transport).

In particular we note that on page 8 the long term strategic contribution is a focus on the 3 Es – enforcement, engineering and education. The 3 E's are a legacy of the previous sector approach to road safety and are inconsistent with the direction set in Safer Journeys. The current terminology is to address safe roads and roadsides, safe vehicles, safe speeds, safe road users. We also consider the RLTS should specifically address within its short, medium and long term horizons how the region will specifically respond to the priority actions set out in the Governments Safer Journeys Action Plan 2011-2012.

We do not wish to be heard in support of this submission

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Yaxley', written in a cursive style.

Mark Yaxley
Regional Planning and Investment Manager
Canterbury & West Coast



