

# **Draft Canterbury Regional Land Transport Strategy 2012 - 2042**

Officer Summary of Submissions  
and Recommendations

October 2011



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## **1 Introduction**

The “Draft Canterbury Regional Land Transport Strategy 2012 - 2042” (DRLTS) was published for consultation on the 20<sup>th</sup> August 2011. The consultation period closed on 23<sup>rd</sup> September 2011. Twenty nine submissions were received. The submitters are listed in the index by submitter.

Canterbury Regional Council originally selected a hearing sub-committee comprising four members of its Canterbury Regional Transport Committee (RTC). Following the resignation of Clr Williams from Christchurch City Council (CCC), the chair of RTC has written to all members recommending that the hearing panel continue with only three members, given that a new CCC appointment to the RTC has not been made. No objections to this proposal have been received and the independent auditor has supported this course of action as being the most appropriate in the circumstances.

The role of this sub-committee is to consider all the submissions received by submitters (including those supported by a verbal presentation at public hearings) and make recommendations to the RTC on the submissions and how the DRLTS should be amended as a result. This report has been produced by officers of Environment Canterbury to assist the hearing sub-committee in their consideration of the submissions received.

### **Structure of report**

The recommended amendments have been summarised and are presented at the beginning of the report.

The main section of this report contains a summary of the submissions received. Submission points have been ordered so they correspond with the relevant section of the draft documents. Submission points relating to the same issue on the same page of the draft documents are clustered and addressed together. General submissions have been grouped as if they occurred on the first page.

Submission points on the Appendices are referenced to a page and paragraph or column rather than to a particular line.

**Note:** The page numbers and the descriptions of the location on the page referenced in this report relate to the draft document as published for consultation and **not** the document marked with Officer's recommendations circulated with this report.

### **Consequential changes**

Note that consequential changes will be required following the editing of the draft documents to incorporate any amendments made. Changes required will include formatting of the text, page renumbering and editing the document to remove typographical errors etc.

## **2 Index by Submitter**

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4	Alison Johnstone (Silver Fern Farms Limited)	11, 17, 41, 42, 46, 62, 64, 66, 69
5	Michael Vincent (New Zealand Historic Places Trust)	32, 33, 72
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13	David Meates (Canterbury District Health Board)	10, 12, 15, 16, 23, 26, 27, 30, 34, 35, 37, 38, 39, 42, 49, 55, 68, 70, 71, 80, 86, 89, 90, 91, 95, 98, 101, 104, 106, 109, 111, 112, 113, 114, 115, 116, 117
14	Andrew Annand	
15	Elizabeth Yeaman ( Energy Efficiency & Conservation Authority)	12, 16, 18, 22, 35, 39, 49, 62, 66, 68, 70, 99, 100, 101, 102, 103, 104, 105, 115, 117, 118
16	Professor Sue McKnight (University of Canterbury)	15, 19, 44, 45, 47
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25	David Cooper (Federated Farmers of New Zealand)	14, 24, 27, 53, 65, 74, 92, 93, 94, 96, 97
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27	Moira Clunie (Royal New Zealand Foundation of the Blind)	15, 20, 48, 70, 118
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### **3 Summary of Recommended Changes**

Throughout the document remove the word “Draft” from all references to the Regional Land Transport Strategy 2012 – 2042.

On Page 2, reword ‘Vision’ to read "Canterbury has an accessible, affordable, integrated, safe, resilient and sustainable transport system."

On Page 3, delete graphic and replace with the list of outcomes accompanied by the following introductory text, which replaces existing text. "To deliver on the objectives of the strategy and also to capture matters identified as key issues and challenges, a series of sought outcomes for the region have been developed. The specific relationships between objectives and outcomes are complex, with many delivering against multiple objectives. The outcomes are more fully defined and discussed in Appendix F."

On Page 4, reword the healthy lifestyles target to read “Increase the relative amount of total travel time that Christchurch City residents spend travelling by active means to 100 hours per person per year by 2024 and to 150 hours per person per year by 2042.

On Page 7, add an additional sentence to the end of the penultimate bullet that reads “Promote the use of energy efficient vehicles and the use of renewable fuels.”

On Page 8, reword the explanatory text for ‘land use and transport integration’ to read “In the longer term, integrated land use decisions, delivered through multi-agency consensus on city district plans that minimise the need for travel, begin to have tangible benefits for Cantabrians.”

On Page 8, delete the first sentence of the explanatory text for ‘reduction in fatal and serious injuries for all modes’ and replace it with “Through a regionally focused implementation of the Safe Systems approach to road safety, as articulated in the Safer Journeys 2020 strategy, all transport modes see a reduction in the number of deaths and injuries over time.”

On Page 9, amend the explanatory text for ‘improved mobility for the transport disadvantaged’ to read “Support for walking, cycling and local services, ongoing accessibility improvements to existing public transport services and a shift to more tailored and targeted public transport will help address transport disadvantage.”

On Page 10, reword second sentence in second paragraph to read “Transport is a means to an end and it can also serve to create better “ends” for individuals and the population as a whole.”

On Page 12, amend last sentence of rural areas cycling text to read “Cycling can be supported by providing a low speed environment and parking for cycles in rural centres as well as safety improvements and road use behaviour marketing campaigns on rural routes where there is a potential for frequent cycle use.”

On Page 13 and Page 14, add the following sentence to the end of the text for cycling. “Workplaces and schools will be encouraged to adopt cycle supportive policies that provide for facilities such as changing rooms, showers and lockers.”

On Page 16, add a new sentence to the end of the third paragraph. “However, should different freight modes and/or demands emerge, adaptation of existing networks and distribution centres will be supported to meet emerging demand.”

On Page 23, amend the first paragraph to read as follows. “Urban form and the way land use patterns and the transport system inter-relate plays a fundamental role in influencing the effectiveness and efficiency of transport. Good, compact integration and urban design provides a high level of access and mobility and can reduce energy use. Poor integration results in an inefficient transport system and can be a significant contributor to transport disadvantage. Certain land uses and transport infrastructure can be incompatible and have a negative impact on the operation of the transport system. The Regional Policy Statement, City and District Plans and the Greater Christchurch Development Strategy play a key role in achieving good integration. Through these documents, local authorities can assist in improving the efficiency of local transport networks and layouts so that people and freight can move around more easily and efficiently.”

On Page 23, add a new sentence to the end of the second paragraph. “Well located intermodal freight terminals also have the potential to significantly reduce energy use associated with the freight task, by allowing more optimal rail / road shipping combinations to be realised.”

On Page 24, amend the first sentence to read “Education, delivered through the driver licensing process and skills training courses, play an important role in improving road safety, as part of a holistic Safe Systems approach.”

On Page 29, amend road maintenance & renewals text as follows: “Maintain and renew the road network as a priority throughout region, ensuring that the "safe systems" principles, together with opportunities to improve the road environment for all users are applied at all times.”

On Page 29, amend short-term State Highway investment box, as follows: “Limited improvements to rural parts of the State Highway network, due to short term expenditure focus on Roads of National Significance. Further development and refinement of investment requirements flowing from State Highway Corridor Strategy studies.”

On Page 29, insert additional text to end of last sentence in Medium-term State Highway investment box as follows: As Roads of National Significance are completed, attention turns to bridge replacements and localised improvements on rural parts of state highway network for safety and travel time reliability e.g. passing lanes, as outlined in State Highway Corridor Strategies.”

On Page 29, amend medium/long term public transport text to read “School buses and some commercial services continue with an increase in accessible community transport services where feasible.”

On Page 29, amend short term land use planning text to read: “Regional and district plans are amended over time to support improved integration between land use and transport and choice of transport modes where feasible. Local authorities work collaboratively with developers to deliver on strategy objectives.”

On Page 29, amend medium term land use planning text to read: “Regional and district plans are amended over time to support improved integration between land use and transport and choice of transport modes where feasible. Implementation of amended plans occurs as soon

as is practicable. Local authorities work collaboratively with developers to deliver on strategy objectives.”

On Page 29, amend long term land use planning text to read: “Amended regional and district plans are implemented and further refined as required to deliver strategy objectives. Local authorities work collaboratively with developers to deliver on strategy objectives.”

On Page 34 and elsewhere in intervention tables, rework tele-working references to read “Tele-work services are assessed for appropriateness and promoted to support working from home and to minimise the need for business travel.”

On Page 35, add the following sentence to the end of the last paragraph in the first column. “It is clear that if the strategy’s aims to improve fuel efficiency in both private and commercial vehicles is successful, there will need to be alternative revenue streams available for transport investment to compensate for the loss of Fuel Excise Duty.”

On Page A2, add following definitions to Glossary. "Urban design principles - Design principles that confirm to the best practice outlined in The New Zealand Urban Design Protocol." "Sustainability - in the transport sector, this is taken to mean finding ways to move people and goods in ways that reduce the impact upon the environment, the economy and society."

On Page A22, add an additional paragraph to end on the discussion on ‘managing the transport impacts of anticipated population change’ as follows: "Another change that is envisaged is the growth in the numbers of young Maori and Pacific Island children in the region."

On Page A25, replace the existing ‘description’ text with the following: “New Zealand’s transport system relies primarily on oil which results in significant transport related greenhouse gas emissions. More efficient and greater use of technologies such as electric vehicles and alternative transport fuels have a valuable role to play in reducing transport related greenhouse gas emissions.”

On Page A25, amend the ‘rationale’ for the GHG section to read as follows: “This outcome is carried forward from the current RLTS 2008 -2018. The proposed focus is to continue to use CO<sub>2</sub> as a proxy for other greenhouse gases as it can be readily estimated from petrol and diesel sales. As a signatory to the Kyoto Protocol, New Zealand has an international obligation to reduce its CO<sub>2</sub> emissions and domestic transport has an important role to play to achieve this goal. New Zealand is actively working to secure an internationally binding agreement to supersede the Kyoto Protocol post 2012. The New Zealand Emissions Trading Scheme is aimed at internalising a carbon cost to the price of transport fuels, but this, on its own is unlikely to have a significant impact upon the CO<sub>2</sub> that is produced by domestic transport. The experience of Canterbury in this regard over the past decade has not been positive. CO<sub>2</sub> produced by domestic transport has grown consistently on the back of economic and population growth. If the region’s population continues to grow as is predicted, then there needs to be a decoupling of the strong linkages between CO<sub>2</sub> emissions from transport sources and economic growth. Increased transport sector efficiency and increased use of renewable energy provide an opportunity to reduce transport related greenhouse gas emissions. The direct use of sustainably-produced biofuels for example has a role to play and have available in some parts of New Zealand since 2007. In addition, electric vehicles have an important role to play in the future given the high and increasing percentage of New Zealand’s electricity generated from renewable sources. Around 70% of New Zealand’s electricity is generated from renewable resources and the Government’s target is that 90% of electricity will be generated from renewable energy by 2025.”

On Page A26, amend second paragraph to read: “The region’s transport system is heavily reliant on imported petroleum products. By diversifying the region’s transport energy sources and reducing the region’s reliance on overseas supply of fossil fuels, through increasing the availability and use of renewable energy, Canterbury will be more resilient to changes in the availability and cost of energy over the period of the strategy. By using sustainably produced biofuels and electric vehicles to run our transport fleets we can - improve security of supply and lessen our reliance on imported oil. Electric vehicles have an important role to play given the high percentage of New Zealand’s electricity generated from renewable resources.”

On Page A26, amend fourth paragraph to read: “One of the themes to emerge from the consultation process on the key issues for the RLTS was the community expectation that new technology and alternatives to oil would reduce exposure to the effects of future increases in petroleum prices. Therefore, there is a need to also provide for a level of energy resilience so that the region can continue to prosper.”

On Page A28, amend penultimate paragraph to read: “This outcome relates to a number of aspects of transport choice by users and suppliers of the transport system, as well as supporting greater integration of land use. Efficiency gains can be made by encouraging better driver behaviour, encouraging trips to be taken by more energy efficient modes and technologies and encouraging shorter trips through location choices and service provision as well as influencing the composition of the region’s vehicle fleet.”

On Page A29, amend second paragraph to read: “If the region’s transport system is to become more energy efficient and resilient to external factors that impact upon transport affordability and resilience, there is a need to drive more efficiently, make better use of low energy modes and vehicle technologies, ensure development is undertaken and technology used in such a way that the need to travel is reduced and the overall energy efficiency of the region’s vehicle fleet is improved. By encouraging a more energy efficient fleet and more energy efficient trip choices, economic development is assisted by reducing the financial burden on households and businesses to expend on transport and fuel costs which increases the capital available for more productive purposes.”

On Page A32, reword off-road cycle network text to read “Intensified investment in multi-function, off-road rapid cycle network and local cycle links, particularly in areas where incompatible modal interactions create safety issues.”

On Page A34, replace current text on total mobility in the medium term with the following: “Mobility services provided, using innovative approaches as necessary, to reduce social exclusion and transport disadvantage.”

On Page A37, reword medium and long term social marketing text to read “Social marketing programmes are initiated to acknowledge the health benefits of active transport and promote behaviour change by normalising use of active modes, public transport, rideshare, etc.”

On Page A42, reword medium and long term social marketing text to read “Social marketing programmes are initiated to acknowledge the health benefits of active transport and promote behaviour change by normalising use of active modes, public transport, rideshare, etc.”

On Page A53, insert new line in indicator table under ‘diesel sales / regional GDP’ to read: “Increased energy efficiency per trip / Number of alternative fuel supply sites in the region (e.g. retail sites offering low biofuel blends or wholesale sites with high biofuel blends), Number of vehicles which can use high biofuel blends, Number of electric vehicles / Regional

Council using data supplied by EECA / Public Transport MJ/pax. km - National baseline 2009: Car = 2.01, bus = 0.86, rail = 0.85. Freight Transport MJ/tonne km - National baseline 2009: Road freight = 3.6, Rail freight = 0.56. Monitoring indicator only, no targets envisaged. Data for indicators dependent upon successful development and ongoing supply from EECA.

On Page A59, replace current text on NZEECS with the following: “The New Zealand Energy Efficiency and Conservation Strategy 2011-2016 (NZEECS) sets the Government's strategic direction for energy efficiency and renewable energy across all sectors. For the transport sector, the NZEECS sets the objectives for a more energy efficient transport system, with greater diversity of fuels and alternative vehicle technologies.”

## 4 Summary of submissions, evaluations and recommendations

### General Non-Specific Submission Points

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Aoraki Development Business & Tourism	22.01	0	0	Submitter supports the overall direction of the strategy.		Support is noted.
CDHB	13.1	0	0	Overall direction of the strategy is endorsed.		Support is noted.
CDHB	13.2	0	0	The submitter notes the lack of a cultural perspective, particularly relating to the Treaty of Waitangi	Amend strategy to include recognition of the partnership principle of the Treaty of Waitangi and the statutory obligation on Territorial Authorities to actively involve Maori in decision making, implementation and monitoring of natural resource issues.	The Draft RLTS has been prepared to meet the requirements of the Land Transport Management Act 2003 (LTMA), which does not stipulate that the statement requested by the submitter is a component part of a compliant strategy. The RLTS development process has been managed by the RTC, which should have a cultural representative upon it to represent Maori in the decision making process as the submitter indicates. The committee has operated with this position vacant, despite efforts to rectify this situation, through a large part of the development process. To conform with consultation requirements of the LTMA, a copy of the draft strategy was sent to all runanga in the region. No comments were received.
CIAL	9.6	0	0	CIAL generally supportive of the RLTS as drafted, they would like to ensure that the interface between land transport and the airport is prioritised in terms of future development.		Support is noted. The importance of the interface between the airport and the strategic land transport network is explicitly noted and the airport is identified as a freight hub within the strategy.
Kaikoura District Council	10.1	0	0	Support the overall direction of the document.		Support is noted.
Living Streets Canterbury	18.01	0	0	Overall, the submitter strongly supports the direction of the		Support is noted.

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				Draft RLTS.		
Michael de Hamel	1.1	0	0	Seeks consideration to be given to a longer term time frame. Considers it is not enough just to plan as far ahead as 2042.		The strategy time horizon is stipulated by the Land Transport Management Act 2003
New Zealand Transport Agency	23.01	0	0	Submitter supports the overall direction of the strategy.		Support is noted.
Silver Fern Farms Ltd	4.1	0	0	Generally supports strategy because planning and investment in the road, rail, air and sea links is essential to maintaining an efficient and effective transport network.		Support is noted.
South Canterbury Chamber of Commerce	20.01	0	0	Submitter supports the overall direction of the strategy.		Support is noted.

**Recommendations**

That submissions are noted and those points related to the strategy time horizons and cultural perspective are rejected for reasons noted.

**Amendments**

None.

1-1 Regional Issues & Challenges – General

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.3	1	1	Support all as listed, but note that demographics is not just about an aging population but also about increased numbers of Maori and Pacific Island children and young people and also about those who will find owning and operating a private vehicle beyond their financial means.		One of the key themes in the strategy's strategic direction is about providing more choice. This greater envisaged choice is for all groups of society in the region, including the groups noted in this submission.
EECA	15.01	1	1	Submitter supports the issues and challenges as listed, but wishes to add explicit reference to the need to develop an energy efficient transport system as a further issue / challenge.	Amend Page 1 by inserting the following - "An energy efficient transport system". Amend Appendix D by inserting the following - "An energy efficient transport system. Increasingly the energy efficiency of transport systems is a major challenge and offers significant opportunities to maximise the use of renewable transport fuels and efficient vehicles to improve productivity of the overall economy. Improved efficiency results in a number of benefits including reduced greenhouse gas emissions an increased security of fuel supply. Key Challenge - Increasing the use of efficient and renewable transport options to improve the energy efficiency of Canterbury's transport	The regional issues and challenges were adopted by the RTC very early in the strategy development process, following a series of key stakeholder meetings, market research, background research and public consultation. Whilst an energy efficient transport system was not highlighted explicitly, energy efficiency is captured in several of the issues and challenges listed - such as oil supply and fuel price volatility and uncertainty about international technology trends. Given that the strategy has been developed from an agreed list of issues and challenges, it would be inappropriate to amend this list at this stage in the process. Furthermore, energy efficiency is an objective or outcome rather than an issue - consideration is given to the topic in this context in later points from the submitter.

					system."	
Kiwirail	12.1	1	1	Submitter supports the regional issues and challenges as listed, particularly supporting freight, tourism and the economy, improving road safety for all users and network security		Support is noted.

**Recommendations**

That submissions are noted and the point related to explicit reference to energy efficiency is rejected for reasons noted.

**Amendments**

None.

**1-11 Issues & Challenges – Dispersed Communities**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.01	1	11	Submitter generally supports the list of regional issues and challenges and is particularly supportive of the intent to meet the transport needs of dispersed communities.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**1-13 Issues & Challenges – Population Change**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Michael de Hamel	1.2	1	13	Supports need to manage transport impacts of population change, referring to population growth in particular.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

## 2-1 Vision

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Royal NZ Foundation of the Blind	27.01	2	1	Submitter notes that, whilst accessibility is identified as a key challenge and one the objectives, it does not form part of the Vision.	Amend Vision to include "accessible".	Accessibility in this sense encompasses many of the aspirations of the strategy. It is not about the ability to access destinations, but rather to 'access' the transport system in integrated, safe, resilient and sustainable manner. For these reasons, the inclusion of 'accessible' in the Vision is supported.
University of Canterbury	16.01	2	1	Submitter strongly supports the vision of the Draft Strategy.		Support is noted.

### Recommendations

That the “Vision” is amended to reflect the first submission point.

### Amendments

Reword Vision to read "Canterbury has an **accessible**, affordable, integrated, safe, resilient and sustainable transport system."

## 2-3 Objectives

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.4	2	3	CDHB endorses all the objectives as listed.		Support is noted.

EECA	15.02	2	3	Submitter wishes to include an additional objective - to ensure an energy efficient transport system. Submitters view is that this is required for the RLTS to take into account the NZECS.	Insert new objective - To ensure an energy efficient transport system.	The key tenets of energy efficiency are already captured in the first objective listed - to ensure a resilient, environmentally sustainable and integrated transport system. This first objective takes into account the NZECS and add to a specific objective on energy efficiency would duplicate much of what is already covered in the first objective.
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### Recommendations

That the first submission point is noted and the second one, regarding an energy efficiency objective, is rejected.

### Amendments

None.

### 3-1 Regional Transport Outcomes – General

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.5	3	1	CDHB endorses all the outcomes as listed.		Support is noted.
CDHB	13.6	3	1	Submitter states that there is a more direct public health relationship with several of the sought outcomes than is shown in the graphic	Amend graphic to show a primary relationship between the public health objective and: reduction in fatal & serious accidents, improved personal safety, connectedness is enhanced, increased travel choice, improved mobility for the transport disadvantaged. Also indicate a secondary relationship between the public health objective and: resilience outcomes and improved	Depending upon one's stance, most outcomes could have a relationship with one or all of the strategy objectives. Missing linkages, linkages with incorrectly specified strength and overstated linkage importance have been a theme running through several submissions. It is noted that the development of this table has also presented officers and the RLTS Working Group with considerable debate and challenge. Given these issues, it is suggested that this table detract from the overall flow of the document and acts as a

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					journey time reliability.	diversion from the key messages conveyed within the strategy. As such, it should be removed, with this section focusing solely on the outcomes and an introductory paragraph that provides more detail in the main document on how they were selected.
Kiwirail	12.2	3	1	Supports outcomes as listed.		Support is noted.
Living Streets Canterbury	18.04	3	1	Disagrees with many of the linkages between outcomes and objectives as defined.	Insert primary relationship between safety outcomes and sustainability objective. Insert primary relationship between proportion of population travelling by active means and safety objective, and a secondary relationship with economic development and accessibility. Insert secondary relationship between energy efficiency outcome and accessibility. Insert primary relationship between connectedness outcome and safety / public health objectives. Insert primary relationship between travel choice outcome and safety / public health / accessibility objectives. Insert primary relationship between improved mobility for transport disadvantaged outcome and resilience / safety / public health objectives.	Depending upon one's stance, most outcomes could have a relationship with one or all of the strategy objectives. Missing linkages, linkages with incorrectly specified strength and overstated linkage importance have been a theme running through several submissions. It is noted that the development of this table has also presented officers and the RLTS Working Group with considerable debate and challenge. Given these issues, it is suggested that this table detract from the overall flow of the document and acts as a diversion from the key messages conveyed within the strategy. As such, it should be removed, with this section focusing solely on the outcomes and an introductory paragraph that provides more detail in the main document on how they were selected.
Silver Fern Farms Ltd	4.2	3	1	Seeks the addition of an outcome worded "stock truck effluent disposal network protected and maintained" noting that forecast growth in the primary production sector	Insert new outcome as follows: "Stock truck effluent disposal network protected and maintained".	It is acknowledged that the existing network of disposal sites within the region may not meet the longer term needs of the region in terms of evolving primary production practices. It is less clear, however, why this should be a sought outcome for the region in a long-term strategy document.

				includes an increase in stock movements, particularly of dairy and beef herds. Considers that given the regional significance of the primary production sector the importance of the regions stock truck effluent network should be recognised in the RLTS and its maintenance and improvement provided for.		Existing sites are 'maintained' and the 'sought outcome' is more about securing additional sites in new locations that might emerge in the future. This is potentially an issue that is better dealt with by direct conversations between stakeholders as matters arise, rather than something that requires a policy direction from the RLTS.
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### Recommendations

Supportive submissions are noted.

Addition of an additional outcome in relation to stock truck effluent disposal is rejected for reasons outlined.

The submission points that either dispute highlighted relationships between outcomes and objectives or propose amendments / additions suggest that the graphic depicting the relationships is unhelpful in aiding understanding and clarity. As such, it is recommended that it is removed from the RLTS and replaced with a simple list of the sought outcomes, with some explanatory text to accompany them.

### Amendments

Delete graphic and replace with the list of outcomes accompanied by the following introductory text, which replaces existing text on P3. **"To deliver on the objectives of the strategy and also to capture matters identified as key issues and challenges, a series of sought outcomes for the region have been developed. The specific relationships between objectives and outcomes are complex, with many delivering against multiple objectives. The outcomes are more fully defined and discussed in Appendix F."**

### 3-2 Transport Outcomes – Emissions

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.03	3	2	Submitter supports the outcomes listed, but seeks amendments to the document to ensure that the full range of	Insert secondary relationship between CO2 outcome and economic development in graphic on P3.	Depending upon one's stance, most outcomes could have a relationship with one or all of the strategy objectives. Missing linkages, linkages with incorrectly specified strength and overstated

				energy efficiency and renewable energy outcomes are identified to take into account NZEECS.		linkage importance have been a theme running through several submissions. It is noted that the development of this table has also presented officers and the RLTS Working Group with considerable debate and challenge. Given these issues, it is suggested that this table detract from the overall flow of the document and acts as a diversion from the key messages conveyed within the strategy. As such, it should be removed, with this section focusing solely on the outcomes and an introductory paragraph that provides more detail in the main document on how they were selected.
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### Recommendations

That the graphic is removed from the strategy, for reasons noted above.

### Amendments

Delete graphic and replace with the list of outcomes accompanied by the following introductory text, which replaces existing text on P3. **"To deliver on the objectives of the strategy and also to capture matters identified as key issues and challenges, a series of sought outcomes for the region have been developed. The specific relationships between objectives and outcomes are complex, with many delivering against multiple objectives. The outcomes are more fully defined and discussed in Appendix F."**

### 3-7 Transport Outcomes – Personal safety

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
University of Canterbury	16.02	3	7	Submitter wishes to engage with the committee to review and improve safety initiatives for both the transport vehicle and the passenger pick up / drop off points surrounding the campus.		Offer of engagement is noted.

**Recommendations**

Submission is noted.

**Amendments**

None.

**3-8 Transport Outcomes – Increased time spent travelling by active modes**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Royal NZ Foundation of the Blind	27.02	3	8	The submitter suggests that accessible pedestrian environments are a key component in increasing travel by active means, so there should be at least a secondary relationship between both active travel outcomes and the accessibility objective.	Insert secondary relationship between both active travel outcomes and the accessibility objective.	Depending upon one's stance, most outcomes could have a relationship with one or all of the strategy objectives. Missing linkages, linkages with incorrectly specified strength and overstated linkage importance have been a theme running through several submissions. It is noted that the development of this table has also presented officers and the RLTS Working Group with considerable debate and challenge. Given these issues, it is suggested that this table detract from the overall flow of the document and acts as a diversion from the key messages conveyed within the strategy. As such, it should be removed, with this section focusing solely on the outcomes and an introductory paragraph that provides more detail in the main document on how they were selected.

**Recommendations**

That the graphic is removed from the strategy, for reasons noted above.

**Amendments**

Delete graphic and replace with the list of outcomes accompanied by the following introductory text, which replaces existing text on P3. **"To deliver on the objectives of the strategy and also to capture matters identified as key issues and challenges, a series of sought**

outcomes for the region have been developed. The specific relationships between objectives and outcomes are complex, with many delivering against multiple objectives. The outcomes are more fully defined and discussed in Appendix F."

**3-11 Transport Outcomes – Journey time reliability**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
David Blackwell	26.02	3	11	Submitter comments that improving journey time reliability on the strategic network seems to be in direct conflict with outcome to reduce fatal and serious injuries.		The focus on journey time reliability is a specific shift in emphasis from focusing on travel time savings. Any upgrades to the network would be designed and developed in such a manner that did not worsen road safety outcomes.

**Recommendations**

That the submission is rejected for the reasons noted.

**Amendments**

None.

### 3-12 Transport Outcomes – Energy efficiency

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.07	3	12	EECA welcomes and supports this outcome, but sees linkages with other strategy objectives that are not currently highlighted.	Retain outcome, but amend graphic on Page 3 of strategy to show primary relationship between this outcome and "resilience" objective and a secondary relationship with the "accessibility" objective.	Depending upon one's stance, most outcomes could have a relationship with one or all of the strategy objectives. Missing linkages, linkages with incorrectly specified strength and overstated linkage importance have been a theme running through several submissions. It is noted that the development of this table has also presented officers and the RLTS Working Group with considerable debate and challenge. Given these issues, it is suggested that this table detract from the overall flow of the document and acts as a diversion from the key messages conveyed within the strategy. As such, it should be removed, with this section focusing solely on the outcomes and an introductory paragraph that provides more detail in the main document on how they were selected.

#### Recommendations

That the graphic is removed from the strategy, for reasons noted above.

#### Amendments

Delete graphic and replace with the list of outcomes accompanied by the following introductory text, which replaces existing text on P3. **"To deliver on the objectives of the strategy and also to capture matters identified as key issues and challenges, a series of sought outcomes for the region have been developed. The specific relationships between objectives and outcomes are complex, with many delivering against multiple objectives. The outcomes are more fully defined and discussed in Appendix F."**

### 3-16 Transport Outcomes – Increased travel choice

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
David Blackwell	26.01	3	16	Submitter fully supports the sought outcome of increasing travel choice to urban and suburban centres.		Support is noted.

#### Recommendations

That the submission is noted.

#### Amendments

None.

### 4-6 Targets – The Environment

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.7	4	6	Supports direction of targets but considers that the staging too slow.	Shorten timeframe for increased active transport hours or increase the 2024 target to 120 hours.	The targets have been constructed with reference to the rate of transition of investment decisions that the strategy is signalling. Given current funding priorities from central government and the need to lobby government for a change of priorities for funding in Canterbury, more aggressive targets in this area is unlikely to be matched by the required investment to deliver it. As such, the targets proposed are deemed realistic, given the challenges that the region faces to change direction over time.

Federated Farmers	25.08	4	6	Submitter believes that this is a central government task, so there is no need for the RLTS to have a target in this area.	Delete target.	The submitter is correct to note that many of the 'tools' that will deliver on this issue are nationally developed - e.g. engine emission standards. There is, however, much that the region can do to support vehicles and behavioural changes that reduce the carbon footprint of the region's travel demands. Having a regional target allows such interventions to be effectively support by the regional strategy.
Sharon MacKenzie	11.1	4	6	Increasing congestion and reducing speed limits will increase petrol consumption and thus CO2 emissions.		If this occurred across the entire network, the point that the submitter makes would be correct. The strategy does not set out to increase congestion, but rather manage the network in a manner that allows it to function more efficiently. On some local roads, this will involve a reduction in the speed environment to deliver on several outcomes, but the intention of this is not to increase congestion.

### Recommendations

That the submissions are rejected for the reasons noted.

### Amendments

None.

### 4-7 Targets – Road Safety

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.3	4	7	Reducing the numbers of cars on the road is the wrong way to reduce road deaths.		This is not what the strategy tries to articulate. P8 outlines that road safety outcomes will be delivered by enforcement and engineering efforts across all modes, coupled with better provision of walking and cycling infrastructure to specifically improve safety outcomes in these areas.

Sharon MacKenzie	11.4	4	7	Increasing numbers of pedestrians and cyclists on the roads, together with the predicted increases in freight traffic will not deliver sought road safety outcomes.		The submitter is correct that active modes do not mix well with heavy vehicle traffic. An amendment to the Greater Christchurch intervention table to make this link is proposed to clarify.
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### Recommendations

That the first submission point is rejected for the reason noted.

In relation to the second point, the submitter highlights an important issue that has not been explicitly recognised and address in the strategy. An amendment to the intervention tables to reflect it is recommended.

### Amendments

Amend Greater Christchurch off-road cycle network intervention to read: “Intensified investment in off-road rapid cycle network and local cycle links, particularly in areas where incompatible modal interaction creates safety issues.”

### 4-9 Targets – Healthy lifestyles

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.10	4	9	Increasing the amount of active travel will detract from other activities that people enjoy.		The inference that the submitter has taken from the wording was not what was intended. The target is to increase the proportion of total travel time that is undertaken by active means, not to increase the amount of travel for the sake of it. As such, an amendment to the wording is proposed to clarify what is meant.
Sharon MacKenzie	11.8	4	9	It is people, not cars, who are the cause of the country's obesity problems.		Whilst the submitter is correct that obesity is largely driven by personal choices, by making active modes of travel more attractive for shorter trips, the strategy will allow more people to be able to choose to travel by these means if they wish to.

### Recommendations

In relation to the first point, it is recommended that the wording of the target is amended to clarify what is intended. That the second submission point is noted.

### Amendments

Reword the target as follows: Increase the **relative** amount of **total travel** time that Christchurch City residents spend travelling by active means to 100 hours per person per year by 2024 and to 150 hours per person per year by 2042.

### 4-10 Targets – Predictable travel times

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.8	4	10	Support predictable travel time targets, but wish to see explicit mention of public transport.	Amend targets 5 to 7 inclusive to read "...by motor vehicles, including public transport".	All these targets are focused on the strategic road network of the region, as defined in the document. The reliability sought is for general traffic lanes. Where bus priority is provided, we would expect public transport to be more reliable in the peak periods than general traffic. As such, it is not appropriate to make this explicit link to public transport. Furthermore, much of the public transport operation within both Greater Christchurch does not operate on the strategic road network, so would be unaffected by such a change.
Sharon MacKenzie	11.11	4	10	How are predictable travel times compatible with shift to active modes, slower speeds and other traffic management practices?		The target is specifically focused at improving travel time predictability on the strategic road network of the region. On these roads, the strategy aims to reduce journey time variability. On the wider network, this is not the focus of the strategy.
Sharon MacKenzie	11.12	4	10	If travel times are increased, as this strategy signals, this will reduce the attractiveness of the region to residents.		The strategy aims to address congestion issues on the strategic road network, through its focus on improving journey time reliability. Congestion on other parts of the network is currently limited and localised and is not forecast to worsen markedly

						into the future. As such, travel times for most trips are unlikely to increase over the life of the strategy.
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**Recommendations**

That the first point is rejected for reasons noted.  
That the other two points are noted.

**Amendments**

None.

**4-13 Targets – Efficient trip making (petrol)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.9	4	13	Support targets around efficient trip making, but seek alignment between the RLTS and the Greater Christchurch Travel Demand Management Strategy.		The RLTS contains its own Demand Management Strategy, outlined in Appendix H. The Greater Christchurch Travel Demand Management Strategy is a non-statutory document that was developed by the Urban Development Strategy partners to implement the strategic direction set by the RLTS. As such, if the UDS partners wished to formally adopt these RLTS targets within a lower level document, that is a decision for them to take and not something that can be signalled in the RLTS.
Federated Farmers	25.09	4	13	Submitter argues that market drivers (via higher fuel costs) will reduce fuel consumption in a more effective and efficient manner than any regulatory or planning tool.	Delete target.	Whilst this is true, using fuel prices alone is a very blunt tool that will impact those least able to pay for an alternative the most and the volatility issues outlined in the strategy serve to make informed response to market signals difficult. Market drives will indeed force behaviour change, but the policies outlined in this strategy aim to provide alternatives so that Cantabrians are able to make attractive

						alternative choices if fuel prices rise significantly.
Sharon MacKenzie	11.23	4	13	Submitter notes that if the strategy is successful in reducing petrol consumption over its life, there is no explanation of how the loss of tax revenue will be addressed if funding for transport is to remain at similar levels.		This point is accepted as not being explicitly addressed in the strategy. An amendment to wording is recommended to clarify.

### Recommendations

That the first two points are rejected for the reasons noted.

That the third point is accepted and addressed by way of a clarification in the Funding section of the strategy.

### Amendments

Add the following sentence to the end of Page 35, Line 20. **It is clear that if the strategy's aims to improve fuel efficiency in both private and commercial vehicles are successful, there will need to be alternative revenue streams available for transport investment to compensate for the loss of Fuel Excise Duty.**

### 4-14 Targets – Efficient trip making (diesel)

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.13	4	14	Disagrees with the strategy attempting to improve trip making efficiency by discouraging the use and ownership of private motor vehicles, especially those with larger engines.		Whilst much of the strategy is about providing more travel choices for Cantabrians, the submitter is correct that there is explicit focus on influencing vehicle purchasing decisions through the taxation system - particularly through encouraging the purchase of smaller engined vehicles. This is common practice overseas, to ensure that fuel efficient vehicles are encouraged. The submitter disagrees with this policy stance.

**Recommendations**

That the submission point is noted.

**Amendments**

None.

**4-15 Targets – Efficient trip making (SOV's)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.20	4	15	Opposes unfair targeting of older Cantabrians by forcing them not to drive and use other modes.		This is not the intention of the strategy. The intent of the strategy in this area is to encourage car sharing and the use of other modes, rather than to force people from their cars.
Sharon MacKenzie	11.21	4	15	States that the strategy is unworkable if it is advocating that service providers / trade persons are forced to car pool.		The intent of the strategy is not to force behaviour change, but rather provide a wider range of viable alternatives. It is clear that for many businesses, single occupant, car borne travel will still remain a core part of their business. By encouraging other trips to be made more efficiently, road space available for these high value trips will be increased.

**Recommendations**

That the submissions points are noted.

**Amendments**

None.

### 5-1 Strategic Direction – general points

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Kiwirail	12.3	5	1	Submitter supports the strategic direction as articulated.		Support is noted.
Sustainable Otautahi	21.01	5	1	Submitter supports the overall direction of the strategy.		Support is noted.

#### Recommendations

That the submissions points are noted.

#### Amendments

None.

### 5-4 Strategic Direction – land use patterns

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.10	5	4	Endorse the statement that the transport system must be supported by land use patterns that make transport accessible and affordable, but note that it is imperative that the RTC works with CERA around decisions that are taken upon new land areas to be developed.	Insert commentary that notes the need to work with CERA in decisions on land use driven from earthquake recovery needs.	Whilst a valid comment, this is role for the UDS partners (rather than the RTC) and this will be achieved through their involvement in the development and implementation of various Recovery Plans. The RTC and the sub-group tasked with developing the RLTS have deliberated at length how the RLTS should interface with emerging recovery plans. It is the view of the RTC that the Strategic Direction articulated in this strategy will be taken into consideration as CERA and its key stakeholders develop those Recovery Plans.

**Recommendations**

That the submission point is rejected in part. The endorsement is noted, but the amendment sought is not supported.

**Amendments**

None.

**5-21 Strategic Direction – Box (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
SPOKES	17.05	5	21	Submitter suggests that strategy needs to be redrafted to prioritise transport options differently.	Redraft to prioritise and deliver transport options that are: sustainable and viable in the face of increased and volatile energy costs, support genuine transport mode choices, are resilient in the face of natural disasters, allow local transport spending to better benefit the local economy, reduce pollution, improve public health by encouraging regular exercise.	The mix of transport projects that are funded in New Zealand is driven by the Government Policy Statement on Transport and then further prioritised by New Zealand Transport Agency funding rules and project appraisal guidelines. The hierarchy proposed by the submitter is not how projects are prioritised. The strategy acknowledges that to deliver on its stated objectives, there is a need to lobby central government to change its funding mix in the medium term. We will still be faced with the same project appraisal framework even if this advocacy is successful.
SPOKES	17.06	5	21	Submitter suggests that the strategy needs to develop alternative project appraisal processes for the region in order to better reflect the real costs and benefits associated with projects.	Amend the strategy to develop and implement the following: comprehensive cost benefit, value for money analysis including health, safety, transport choice, sustainability, pollution, local economic impact, be applied to all transport projects and their well developed active transport	A travel demand management strategy is provided within the strategy - Appendix H. Education, promotion and enforcement programmes are all described in the intervention tables in Appendix G. With regard to the proposed project appraisal process, the Regional Transport Committee does not receive, appraise or fund transport projects. This is the role of the New Zealand Transport Agency.

					alternatives, education, promotion and enforcement programmes in support of active transport, travel demand management.	
West Coast Regional Council	3.1	5	21	Supports the strategic direction of "finishing what we started" specifically in relation to the timely upgrade of State Highway 73 - Mingha Bluff to Rough Creek.		Support is noted.

### Recommendations

That the first two submission points are rejected for reasons noted and the third is noted.

### Amendments

None.

### 5-22 Strategic Direction – Box (infrastructure)

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
New Zealand Historic Places Trust	5.1	5	22	Seeks that provision is made in maintenance programmes for the provision of regular maintenance and structural improvement of network infrastructure assets that are identified as possessing a high number of historic features.	That provision is made in the strategy to incorporate an inventory of historic features associated with the network.	This is not a strategy issue, but rather an addition to the asset management plans of each Territorial Local Authority (TLA) in the region. The New Zealand Transport Agency (NZTA), through its co-funding of local authority asset management activities, is the organisation best placed to deliver this sought outcome. The sought change could be delivered by NZTA from a national perspective to provide necessary input to TLA asset management plans.

New Zealand Historic Places Trust	5.2	5	22	Seeks that provision is made in maintenance programmes for the provision of regular maintenance and structural improvement of network infrastructure assets that are identified as possessing a high number of historic features.	That the strategy advocates that a GIS system is developed to provide up to date mapping of historical features.	This is not a strategy issue, but rather an addition to the asset management plans of each Territorial Local Authority (TLA) in the region. The New Zealand Transport Agency (NZTA), through its co-funding of local authority asset management activities, is the organisation best placed to deliver this sought outcome. The sought change could be delivered by NZTA from a national perspective to provide necessary input to TLA asset management plans.
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**Recommendations**

That both submission points are rejected for reasons outlined.

**Amendments**

None.

**6-1 Strategic Direction - explained (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Kaikoura District Council	10.2	6	1	Suggest that the document needs to look beyond the statutory 30-year time horizon for guidance on long term issues. Notes that this is done in Appendix D and the approach taken in the document is supported.		Whilst the time horizon of the RLTS is governed by statutory requirement, the issues and challenges articulated in the strategy can be considered to be long-term in nature - whatever the definition of the long-term might be.

**Recommendations**

That the submission point is noted.

**Amendments**

None.

**6-6 Strategic Direction - explained (short-term)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.11	6	6	The short term direction overlooks the unprecedented opportunity that earthquake recovery offers to make a huge difference to future travel patterns.	Amend the short term strategic direction to emphasise the opportunity that earthquake recovery offers to advance all the objectives and targets in the Strategy.	The RLTS cannot be inconsistent with short-term funding priorities, as signalled by the Government Policy Statement on Land Transport Funding. The RTC and the sub-group tasked with developing the RLTS have deliberated at length how the RLTS should interface with emerging recovery plans. At the time of strategy preparation, the content of earthquake Recovery Plans for both the Central and wider city of Christchurch are unknown and not endorsed by government. As such, the RLTS cannot assume what the content and quantum of transport investments stemming from this might be. This is commented on P33 of the strategy.
Living Streets Canterbury	18.02	6	6	Considers that the short-term focus on BAU is misguided given the opportunities and unusual conditions in which the region finds itself post-earthquake.	Amend the short-term strategic direction to focus on the opportunities that earthquake recovery plans may offer for earlier implementation of the medium term aims.	The RLTS cannot be inconsistent with short-term funding priorities, as signalled by the Government Policy Statement on Land Transport Funding. The RTC and the sub-group tasked with developing the RLTS have deliberated at length how the RLTS should interface with emerging recovery plans. At the time of strategy preparation, the content of earthquake Recovery Plans for both the Central and wider city of Christchurch are unknown and not endorsed by government. As such, the RLTS cannot assume what the content and quantum of

						transport investments stemming from this might be. This is commented on P33 of the strategy.
EECA	15.14	6	6	Submitter notes that the earthquake response provides short term opportunities to advance several of the medium term goals of the strategy.	Add the following to the end of the short-term strategic direction text: <b>Short term opportunities to promote multi-mode and efficient, sustainable transportation will also be identified and progressed over the short term with a particular focus on the earthquake recovery effort.</b>	The RLTS cannot be inconsistent with short-term funding priorities, as signalled by the Government Policy Statement on Land Transport Funding. The RTC and the sub-group tasked with developing the RLTS have deliberated at length how the RLTS should interface with emerging recovery plans. At the time of strategy preparation, the content of earthquake Recovery Plans for both the Central and wider city of Christchurch are unknown and not endorsed by government. As such, the RLTS cannot assume what the content and quantum of transport investments stemming from this might be. This is commented on P33 of the strategy.

### Recommendations

That the three submission points are rejected for the reason noted.

### Amendments

None.

### 7-1 Strategic Direction - explained (medium-term) general

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.14	7	1	Submitter supports the general direction of the medium term strategy and strongly endorses the need for integration between transport and land use planning.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**7-8 Strategic Direction - explained (medium-term) maintaining infrastructure**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Waitaki District Council	6.1	7	8	Seeks that within the first priority area for the strategy, there is a further prioritisation of maintenance resources towards maintaining assets that provide for interregional traffic flows.	That the "first priority" of maintaining existing infrastructure is further defined to explicitly identify, and prioritise, the maintenance of assets that service inter-regional movements.	The strategy notes (P16) that two thirds of current freight movement in the region is wholly within the region, particularly between the hinterland on the Canterbury Plains and processing plants or ports. Given this pattern is forecast to continue into the future, there does not appear to be a compelling case for prioritising inter-regional links over intra-regional ones.

**Recommendations**

That the submission is rejected for the reason noted.

**Amendments**

None.

**7-10 Strategic Direction - explained (medium-term) reallocating road space**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.12	7	10	Submitter suggests that there is a need to focus on off-road cycleways to boost cycling effectively, rather than just re-allocate roadspace.	Insert the word "separated" wherever there is a reference in the document to urban cycleways	The intervention tables for Greater Christchurch (P32) do signal that investment in an off-road rapid cycle network will be intensified. Having said this, off-road / separated solutions are not a panacea. There are lower traffic volume situations in Christchurch and elsewhere around the region where on-road solutions represent a positive and cost effective way through which to improve the attractiveness of cycling as a mode of transport.

**Recommendations**

That the submission is rejected in part for the reason noted.

**Amendments**

None.

**7-16 Strategic Direction - explained (medium-term) reduced need to travel**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.13	7	16	Submitter cautions the inference that there is a direct and causal link between increased use of communication technology and a reduced need to travel. Submitter cites evidence that the result may not necessarily be reduced travel demand and strategy suggests.	Ensure that strategy notes the need to investigate initiatives fully to ensure no unintended consequences.	The submission point is noted and research into the appropriateness of these types of interventions should be a precursor to widespread rollout. Appropriate wording to recognise this is recommended.
Sharon MacKenzie	11.9	7	16	Encouraging people to work/shop from home will make them more sedentary.		Whilst the outcome that the submitter suggests may be true for some, the intent of the intervention is to provide more choice for all.

**Recommendations**

The first point is recommended for inclusion in the intervention tables by way of a redraft as suggested below.  
That the second point is noted.

**Amendments**

Amend intervention tables (P34 and elsewhere) to read as follows: "Tele-work services are **assessed for appropriateness and** promoted to support working from home and **to** minimise **the** need for business travel."

**7-17 Strategic Direction - explained (medium-term) promoting uptake of new technologies**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.15	7	17	Submitter supports the strategic direction as articulated, but wishes to see greater recognition of energy efficiencies in the transport system over the medium term.	Amend Page 7 by recognising the promotion of efficient transport modes and facilitating the use of renewable energy fuels as a key strategic direction for the medium term.	The submission point is noted as a valid way to improve the focus of the strategy on energy efficiency matters.

**Recommendations**

That the submission is rejected in part for the reason noted.

**Amendments**

Insert new intervention measure bullet point after existing text on promoting new technologies in planning documents to read: **“Promotion of efficient transport modes and facilitating the use of renewable energy fuels as a key strategic direction for the medium term.”**

**8-1 Strategic Direction - explained (long-term) general**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.15	8	1	Submitter strongly endorses the long term strategic direction of the strategy.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**8-6 Sought Outcomes – general points**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Aoraki Development Business & Tourism	22.02	8	6	Submitter is supportive of sought outcomes that improve journey time reliability, increase energy efficiency, maintain regional and inter-regional journey time reliability on key freight routes and maintain/protect freight hubs.		Support is noted.
Aoraki Development Business & Tourism	22.03	8	6	In light of recent events, submitter is supportive of outcomes to improve the transport networks resilience to infrastructure damage or emergencies and also to external changes.		Support is noted.
Aoraki Development Business & Tourism	22.04	8	6	Submitter supports outcomes to reduce fatal and serious accidents and to improve health through more time spent travelling by active means.		Support is noted.

Silver Fern Farms Ltd	4.3	8	6	Seeks the addition of a sought outcome worded "stock truck effluent disposal network protected and maintained" and wording along the lines of "Maintenance and enhancement of stock truck effluent disposal network, including the addition of appropriately sited facilities (using fair funding mechanisms) will ensure the timely and appropriate disposal of stock truck effluent." for how the strategic direction contributes.	Addition of a sought outcome worded "stock truck effluent disposal network protected and maintained" and wording along the lines of "Maintenance and enhancement of stock truck effluent disposal network, including the addition of appropriately sited facilities (using fair funding mechanisms) will ensure the timely and appropriate disposal of stock truck effluent." for how the strategic direction contributes.	Canterbury has a limited network of disposal sites currently and problems when they arise tend to be localised in nature. Furthermore, there already exists an effective mechanism between the regional council, road controlling authorities and other players for resolving issues as they arise. From the available evidence, there is not enough of a serious region-wide issue to warrant its inclusion in the strategy as a sought outcome.
South Canterbury Chamber of Commerce	20.02	8	6	Submitter is particularly supportive of sought outcomes that reduce greenhouse gas emissions, improve resilience to emergency events, improve journey time reliability and maintain regional and inter-regional journey time reliability on key freight routes.		Support is noted.

**Recommendations**

That support is noted in the first three and the last point.

That the submission point around a new outcome on stock truck effluent is rejected for the reason outlined.

**Amendments**

None.

### 8-8 Sought Outcomes – resilience

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Silver Fern Farms Ltd	4.4	8	8	Support retention of the intent of this sought outcome for improving the resilience of the transport network.		Support is noted.

#### Recommendations

That support is noted

#### Amendments

None.

### 8-10 Sought Outcomes – land use transport integration

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.16	8	10	The need for multi-party collaboration to deliver this long term direction should be explicitly mentioned.	Insert direct reference to working with other agencies and to the Central City Plan.	The point made is valid, although the text in the strategy to which it is directed is a reference to the whole of the region and not just Christchurch City. More explicit reference to multi-agency interaction and the need to strengthen planning document might, however, make the required action that is needed clearer.

#### Recommendations

That the submission point is accepted and a redraft of the explanatory text is made accordingly.

### Amendments

Reword the explanatory text to read: "In the longer term, integrated land use decisions, **delivered through multi-agency consensus on city and district plans**, that minimise the need for travel begin to have tangible benefits for Cantabrians".

### 8-11 Sought Outcomes – safety

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
New Zealand Transport Agency	23.04	8	11	Submitter contends that the strategy does not reflect the government's safer journeys approach to road safety. In particular, the three E's as described here are a legacy of the previous sector's approach to road safety.	In the description of the sought outcome and also in the detailed intervention tables, articulate how the region will interpret the priority actions set out in the Safer Journey's Action Plan 2011.	It is a valid point that the strategy does not make explicit reference to the Safer Journeys Strategy, or the Safe Systems approach to road safety. Several drafting issues are proposed to address this. It is not proposed, however, to amend the detailed intervention tables to reflect Safer Journeys priorities. Canterbury does not have many readily identified major accident blackspots that require extensive engineering solutions. The intervention tables already focus on 'safety' in a generic context - the detailed Safe Systems approach will, in a Canterbury context, focus on a diverse range of engineering and non-engineering solutions to make safety improvements.

### Recommendations

That the submission point is accepted and a couple of drafting changes are made to better reflect the Safer Journeys strategy.

### Amendments

Delete first sentence of the 'reduction in fatal & serious accidents' explanation and replace with the following text: **"Through a regionally focused implementation of the Safe Systems approach to road safety, as articulated in the Safer Journeys 2020 strategy, all transport modes see a reduction in the number of deaths and serious injuries over time."** Amend the first sentence on P24 to read: "...in improving road safety, as part of a holistic Safe Systems approach."

**9-1 Sought Outcomes – increase in time spent travelling actively**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Akaroa/Wairewa Community Board	24.01	9	1	The Board supports this outcome, but has serious concerns about encouraging cycle and pedestrian traffic on rural roads.	Make explicit reference in 12.34 that walking/cycling in rural areas is to be discouraged unless specific provision has been made for the activity through infrastructure provision.	The concerns expressed by the submitter are valid. The intervention tables for rural areas in Appendix G (P43) explicitly mention the need for shoulder and bridge widening as part of renewals projects. Cycle tourism is, however, an important component part of the region's tourism offering. As such, to actively discourage cyclists from particular roads in the region would undermine tourism efforts in this area. The concerns raised by the submitter relate to appropriate behaviour by all road users given the road infrastructure that they face.
University of Canterbury	16.03	9	1	Submitter strongly advocates for safe cycle and pedestrian routes to and from the University to encourage increased use of these modes.	Would like to see a firmer statement for this sought outcome which gives greater priority to cyclists and pedestrians.	The outcomes on active travel focus deliberately on the provision of better infrastructure and positive measures to encourage use of these modes. Part of this, as spelled out in Appendix G, is through prioritisation of road space towards active modes, as it provision of additional crossings at key points. As there are many facets to improving the attractiveness of active modes, it would not be appropriate to focus on one particular destination referenced in the outcome description.

**Recommendations**

That the first submission point is rejected in part, but the intervention table is amended to reflect the need to educate all road users on sharing the road appropriately.

That the second point is rejected for the reasons outlined.

**Amendments**

Amend 12.34 to reflect road sharing responsibilities as follows: "...as well as safety improvements **and road user behaviour marketing campaigns** on rural routes..."

**9-4 Sought Outcomes – improved journey time reliability**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
University of Canterbury	16.04	9	4	Supports this outcome and notes that with significant growth to north and south of the city, timing for these improvements will become increasingly important.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**9-5 Sought Outcomes – energy efficiency**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.24	9	5	Submitter suggests that moving towards electric vehicles would make the region more reliant on a single source of energy - electricity - for its transport needs.		The text in Appendix D around oil supply security describes how our transport system is highly reliant upon oil, so making it less reliance on oil by increasing the proportion of vehicles that use alternative energy sources is serving to make the vehicle fleet more resilient over time.

**Recommendations**

That the submission point is rejected for the reason outlined.

**Amendments**

None.

**9-7 Sought Outcomes – freight hubs**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CIAL	9.1	9	7	Supports.		Support is noted.
Silver Fern Farms Ltd	4.5	9	7	Support retention of the intent of this sought outcome for protecting and maintaining freight hubs and the inclusion of the words "Planning that avoids incompatible land uses around freight hubs and networks that are linked directly into hubs will ensure that freight operations can continue to function effectively".		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**9-8 Sought Outcomes – connectedness**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
University of Canterbury	16.05	9	8	Ready access to public transport routes is a key factor in whether a student uses public or private transport. Submitter seeks to engage with committee on routing and timing options to ensure best utilisation of public transport.		Environment Canterbury, not the Regional Transport Committee, is the body with whom the University needs to engage on public transport service planning matters. The submission point has been forwarded accordingly.

**Recommendations**

Note submission and forward to Environment Canterbury PT Operations team.

**Amendments**

None.

**9-9 Sought Outcomes – travel choice**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
University of Canterbury	16.06	9	9	Submitter notes that the document is silent on commuter rail, particularly using the existing rail lines that run through the Greater Christchurch area.	The University encourages the committee to review opportunities to develop rail links from outlying communities into the city.	The RLTS is purposefully silent on the specific mode of public transport that is most appropriate for different parts of Greater Christchurch and beyond. Creating effective and sustainable public transport demand within the city is wholly reliant upon focused effort on key demand corridors and, in these corridors, making public transport as attractive as is possible to maximise demand. There are several studies that have been

						undertaken in the past on the most appropriate mode of public transport for a city such as Christchurch and further studies into the potential viability are currently underway.
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**Recommendations**

That the submission is noted.

**Amendments**

None.

**9-10 Sought Outcomes – transport disadvantaged**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Royal NZ Foundation of the Blind	27.04	9	10	Submitter notes that the strategy is promoting improved accessibility through tailored and targeted public transport, but suggests that this should not solely mean separate disability-specific services.		This is a valid point insofar as the strategy does not mention specific enhancements to existing public transport services to improve mobility for the transport disadvantaged. An amendment is proposed to rectify this.

**Recommendations**

Whilst no specific amendment was sought by the submitter, a drafting change to the explanation on P9 is recommended.

**Amendments**

Amend description on P9 to read: "...local services, **ongoing accessibility improvements to existing public transport services** and a shift..."

**10-1 Role of modes - general**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.16	10	1	The RLTS should identify the role of energy efficient transport modes and future opportunities for the use of renewable transport fuels.	Amend Pages 10 and 12 as follows: "...throughout the region. <b>The transport system will evolve to accommodate increased use of efficient vehicles such as electric vehicles and increased use of renewable fuels. In addition, electric vehicle have an important role to play in the future given the high percentage of New Zealand's electricity generated from renewable sources.</b> ", Public transport - "...help reduce transport disadvantage <b>and improve energy efficiency through the use of efficient vehicles and renewable energy fuels.</b> "	The 'role of modes' section of the strategy describes the function that each mode performs. The use of renewable fuels will not change this function. The role of energy efficient transport modes is captured in the later section on the 'role of technology' which explicitly considers what is envisaged, who will lead its development and what the strategy will do to advocate for central government to increase uptake.

**Recommendations**

That the submission be rejected for the reason described..

**Amendments**

None.

**10-6 Role of modes – role of transport**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.17	10	6	Submitter notes that transport is not only a means to an end, but is also a means to better ends because of the impact that it has on the environment where people	Reword sentence to read "Transport is not only a means to an end, but can also serve to create better ends for individuals and the population as a whole."	Point is accepted, but proposed wording loses the original intent of the text in the attempt to capture the additional context. Transport IS a means to an end, regardless of whether there could be 'better ends'. Re-drafting to clarify

				live, work and play. This has a major impact on individual and public health.		these two points is proposed.
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### Recommendations

That the submission be accepted in part, although the proposed wording loses some of the original intent of the text. An alternative is proposed.

### Amendments

Reword the sentence as follows: "Transport is a means to an end **and it can also serve to create better "ends" for individuals and the population as a whole.**"

### 11-13 Indicative role of people modes over time

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Kaikoura District Council	10.3	11	13	The importance of walking & cycling should be retained and enhanced within the CRLTS.		How the importance should be enhanced is not specified by the submitter.
L & R Mclimont	29.01	11	13	Submitter sees the strategy as an attack on the right to own and operate a motor vehicle and points out that many trips in and around the region can only be made by motor car.		This is not the intent of the strategy and the role that the motor vehicle will continue to play, particularly in rural parts of the region, is explicitly captured in the Role of Modes section.
SPOKES	17.01	11	13	Submitter questions whether the private motor vehicle will continue to be the dominant mode of transport over the life of the strategy.		From the material reviewed during the preparation of the RLTS, there is little to suggest that the private motor vehicle will no longer be around in 30 years time. The strategy acknowledges that fuel to power it is likely to be more expensive and it will not be as dominant as it is today. That said, for a

						large rural region, it is still likely to be more dominant than any other mode.
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**Recommendations**

That the first and third points are noted and that the second is rejected for the reasons outlined.

**Amendments**

None.

**12-2 People modes – region wide (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
SPOKES	17.02	12	2	Submitter suggests that the region-wide role for private motor vehicles articulated in the strategy is incompatible with the goals of resiliency and adaptability.		The strategy attempts to articulate that resilience and adaptability is about having effective transport choices. For some this will entail adjustments to how they travel, potentially using different modes for different trips.

**Recommendations**

That the submission be rejected for these reasons noted.

**Amendments**

None.

**12-16 People modes – region wide (public transport)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Age Concern Canterbury	2.1	12	16	Supports role of public transport as described noting that this will improve mobility for the transport disadvantaged and support as increased number of older people who will rely on public transport.		Support is noted.
Kaikoura District Council	10.4	12	16	Notes that many smaller Canterbury towns have existing rail infrastructure and the role of passenger rail should be addressed explicitly as part of the discussion on "people modes".	Explicit mention and discussion of passenger rail should be made.	The region-wide commentary on P12 around public transport notes that scheduled and commercial public transport services will play an increasingly important role in meeting the region's transport needs. Whether this is rail or coach based public transport would depend upon the commercial viability of the mode for a specific market.

**Recommendations**

That the first submission point is noted and that the second is rejected for the reason outlined.

**Amendments**

None.

**12-23 People modes – region wide (air travel)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CIAL	9.2	12	23	Supports.		Support is noted.
Sharon MacKenzie	11.2	12	23	Strategy promotes more air travel if they wish to travel long distances, will undermine CO2 objectives		The role of air travel outlined in the document does not support more air travel, but recognises that the role of air travel will remain significant over the life of the strategy for international travel, but also for inter-regional travel.

**Recommendations**

That both points are noted.

**Amendments**

None.

**12-24 People modes – rural areas (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.10	12	24	Submitter supports the specific recognition that many alternative to the private car are not viable in a rural context.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**13-12 People modes – small urban areas (walking)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Disability Advisory Group	7.1	13	12	Supports walking routes for those with mobility problems.	Explicit mention of the increase in the aged population and those with disabilities	The amendment sought is non-specific. The text on P13 and P14 makes explicit reference to "well integrated" and "high quality" walking environments. Discussion on P9 also notes that the intent of the strategy in the area of the transport disadvantaged (which includes mobility impaired) is to increase focus on the walking and cycling environments.

**Recommendations**

That the submission point is noted.

**Amendments**

None.

**13-20 People modes – small urban areas (cycling)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.18	13	20	Submitter notes that cycling needs more than secure lock-up facilities to boost uptake. The most important addition is the need for workplaces and schools to have supportive policies that take into account the need for change facilities, showers and lockers.	Add text that notes the need for cycle supportive policies from workplaces and schools. Same comment applies to be small urban centres and Greater Christchurch.	The point is valid and the text could be strengthened by noting the supportive policies that the submitter lists.
Disability Advisory Group	7.3	13	20	Support.	Explicit mention of the increase in multi-purpose use of cycleways.	Christchurch City Council is supportive of multi-use functionality of off-road cycle paths, subject to suitable width of the facility to safely this. The key point here is focusing on off-road paths, with on-road cycleways unsuitable for this type of function - both from a width and safety perspective.

**Recommendations**

Both submission points are accepted and additional explanatory text is proposed to address the points made.

**Amendments**

Add the following sentence to the end of the cycling commentary on Page 13 and 14: "**Workplaces and schools will be encouraged to adopt cycle supportive policies that provide for facilities such as changing rooms, showers and lockers.**"

Amend references to off-road network on page A32 to read: "...investment in **multi function** off-road rapid cycle network..."

**13-24 People modes – small urban areas (public transport)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Age Concern Canterbury	2.2	13	24	Supports role of public transport as described noting that this will improve mobility for the transport disadvantaged and support as increased number of older people who will rely on public transport.		Support is noted.
Sharon MacKenzie	11.18	13	24	Opposes any ratepayer subsidy for intercity public transport services.		The draft strategy envisages that these services will continue to be provided on a commercial basis over the life of the strategy i.e. Funded from fares and not subsidised from rates.

**Recommendations**

That both submission points are noted.

**Amendments**

None.

**14-2 People modes – Greater Christchurch (private motor vehicles)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.6	14	2	Using the car less frequently will reduce skill levels and familiarity over time. This will cause accidents.		For this to occur, the drop off in car use would have to be very significant indeed, for a large proportion of Cantabrians. It is likely to be the case that the fall in traffic associated with this outcome would more than offset any increase

						in accident rates from unfamiliarity.
Sharon MacKenzie	11.7	14	2	Causing congestion and removing parking will increase driver frustration related accidents.		The intention of the strategy is not to increase congestion and the evolution of parking policies envisaged are not aimed at increasing search time, but likely to only eventuate once attractive, viable transport alternatives are in place. In Canterbury, most urban area accidents are caused at intersections.

**Recommendations**

That both submission points are noted.

**Amendments**

None.

**14-13 People modes – Greater Christchurch (walking)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Disability Advisory Group	7.2	14	13	Supports walking routes for those with mobility problems.	Explicit mention of the increase in the aged population and those with disabilities	The amendment sought is non-specific. The text on P13 and P14 makes explicit reference to "well integrated" and "high quality" walking environments. Discussion on P9 also notes that the intent of the strategy in the area of the transport disadvantaged (which includes mobility impaired) is to increase focus on the walking and cycling environments.

**Recommendations**

That the submission points are noted.

**Amendments**

None.

**14-13 People modes – Greater Christchurch (cycling)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Disability Advisory Group	7.4	14	26	Support.	Explicit mention of the increase in multi-purpose use of cycleways.	Christchurch City Council is supportive of multi-use functionality of off-road cycle paths, subject to suitable width of the facility to safely this. The key point here is focusing on off-road paths, with on-road cycleways unsuitable for this type of function - both from a width and safety perspective.

**Recommendations**

That the submission point is accepted and the following drafting amendment is incorporated into the strategy.

**Amendments**

Amend references to off-road network on page A32 to read: "...investment in **multi function** off-road rapid cycle network..."

**14-33 People modes – Greater Christchurch (public transport)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Age Concern Canterbury	2.3	14	33	Supports role of public transport as described noting that this will improve mobility for the transport disadvantaged and support as increased number of older people who will rely on public transport.		Support is noted.
Michael de Hamel	1.3	14	33	Support		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**14-35 People modes – Greater Christchurch (trains)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Disability Advisory Group	7.9	14	35	If passenger trains are considered as part of the future, they should be fully accessible wherever possible.		If passenger rail vehicles were being considered for the region, then accessibility issues for the mobility impaired would be part of this process.

**Recommendations**

That submission point is noted.

**Amendments**

None.

**15-5 Integration between people modes (public transport)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Disability Advisory Group	7.8	15	5	Supports public transport interchange text, but queries no mention of smart cards.	Add explicit reference to smart cards in text on integrated ticketing.	It is assumed that smart cards would be part of an integrated ticketing system, as is the case with the current Metrocard.

**Recommendations**

That submission point is noted.

**Amendments**

None.

**15-10 Integration between people modes (public transport and private motor vehicles)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Disability Advisory Group	7.6	15	10	Supports park & ride facilities, but notes that free parking will be required to increase usage.		Submitters point in respect of free parking at Park & Ride sites is noted. Many successful Park & Ride sites integrate the parking charge into the public transport ticket price to effectively offer "free parking" but

						through a system that allows cost recovery of running costs to be achieved effectively. The exact policy to be pursued, will, however, depend on outcome sought and policy / other complimentary measures for the corridor, e.g. If one wishes to encourage High Occupancy car use & maximise footfall at destinations, then better to charge for parking and make the bus free (more attractive to SOV drivers, more people at destination, better usable/car parking land allocation ratio).
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**Recommendations**

That submission point is noted.

**Amendments**

None.

**15-21 Integration between people modes (private motor vehicles and air travel)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CIAL	9.3	15	21	Supports this and all people-mode to air travel links as described.		Support is noted.
Disability Advisory Group	7.7	15	21	Supports parking facilities at airports, but notes that more "accessible" parking is required.	Add reference to "more accessible parking".	It is assumed that the submitter is referring to specific parking spaces for the mobility impaired that are located close to the terminal. This is already the case at Christchurch International Airport and if there is undue pressure being placed upon the availability of these spaces going forward, this is an issue for the airport company.

**Recommendations**

That both submission points are noted and the second is part rejected for reasons noted.

**Amendments**

None.

### 16-1 Freight modes (general)

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.17	16	1	Submitter seeks recognition of the benefits of consolidating and integrating freight hubs.	Amend pages 16 - 19 to recognise the opportunities to consolidate and centralise freight transportation to reduce energy use per tonne of freight moved per kilometre.	The Role of Modes section describes how each mode operates and interacts with other modes and this includes a discussion of intermodal operations that the strategy will support as commercial decisions are made to expand facilities. This submission point is more about the benefits of effective transport and land use integration. This is where the comment should be addressed.

#### Recommendations

That the submission point is accepted in part, with a amendment made elsewhere in the strategy to reflect the point being made.

#### Amendments

Add a new sentence to the end of Page 23 as follows: **Well located intermodal freight terminals also have the potential to significantly reduce energy use associated with the freight task, by allowing more optimal rail / road shipping combinations to be realised.**

### 16-2 Freight modes (contribution to economy)

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Silver Fern Farms Ltd	4.6	16	2	Supports the statement that: “the primary production sector contributes significantly to the national and Canterbury economy” and the recognition of the “vital” role that freight transport plays in servicing the primary production sector.		Support is noted.

#### Recommendations

That the submission is noted.

**Amendments**

None.

**16-21 Freight modes (future demand)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Kiwirail	12.4	16	21	Submitter supports strategy wording for short and medium term, but contends that in the longer term relative modal volumes may alter significantly in response to changing production patterns, distribution networks and shipping port calls.	Add following to end of paragraph. <b>However, should different freight modes and/or demands emerge, adaptation of existing networks and distribution centres will be supported to meet emerging demand.</b>	Submitters point is supported. To reflect a more responsive stance, amended wording is, however, suggested.
Winstone Aggregates	19.01	16	21	The submitter disagrees with the statement that significant changes in the patterns of freight movements will not occur over the life of the strategy, noting that the demand for building aggregates associated with earthquake rebuild will require significantly altered sources of supply and also extended operating hours at these sites.	Remove the final paragraph of the section and insert the following replacement: "Following the effects of the Christchurch earthquakes, it is considered that there will be a significant in freight traffic in and around Greater Christchurch as the rebuild takes place. To compensate for the increased supply of materials now required to be brought into the city and hardfill and cleanfill to be brought out of the city, an increase of hours for trucking movements shall be required. This is necessary to assist in the rapid rebuild of the city without being unduly constrained by operational hours.	The RTC and the sub-group tasked with developing the RLTS have deliberated at length how the RLTS should interface with emerging recovery plans. The point made by the submitter is valid, but to focus on the earthquake response and one particular traffic flow is a level of detail too low for a strategy document such as this. With regard to the further point regarding hours of operation, the submitters point is generic and not related to specific flows to/from freight hubs as identified in the strategy. To reflect a more responsive stance, amended wording is, however, suggested.

**Recommendations**

Both submission points are accepted in part and additional text to clarify the responsiveness of the strategy to altered demand patterns that emerge is supported.

**Amendments**

Add following to end of paragraph. **However, should different freight modes and/or demands emerge, adaptation of existing networks and distribution centres will be supported to meet emerging demand.**

**17-1 Freight modes – region wide (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Silver Fern Farms Ltd	4.7	17	1	Supports and seeks retention of the recognition of the regional significance of all four of the main transport modes; road, rail, air and sea.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**18-2 Freight modes – rural areas (trucks and vans)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.11	18	2	Submitter supports the strategy's understanding of the role of road and rail freight in rural areas.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**18-41 Freight modes – Greater Christchurch (ports and airports)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CIAL	9.4	18	41	Supports role for CIAL as described.		Support is noted.
CIAL	9.5	18	43	Would like to see a defined, accessible & efficient link between CIAL and Port of Lyttelton described in this section.	Would like to see a defined, accessible & efficient link between CIAL and Port of Lyttelton for high value product and fuel deliveries described in this section.	The submitter is referring to a strategic transport link between the airport and Port of Lyttelton, whereas this section is referring to specific function of both the airport and the port respectively. The network map on P21 shows the alternative link (for dangerous goods and oversize vehicles) between the two that avoid the Lyttelton Road Tunnel.

**Recommendations**

That support is noted for the first point.  
That the second point is rejected for the reasons outlined.

**Amendments**

None.

**19-1 Integration between freight modes**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Silver Fern Farms Ltd	4.8	19	1	Notes the significance of streamlined connections from one transport mode to the other.		The submission point is general and supportive.

**Recommendations**

That support is noted

**Amendments**

None.

**20-1 Role of strategic network**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.18	20	1	Submitter seeks amendment to recognise that there are significant opportunities for better integration of road freight with other more energy efficient modes. Sees improving the efficiency and reliability of	Amend Page 20 to recognise the priority to improve efficiency and reliability and to achieve better integration.	This section describes what strategic networks 'do' and does not get into how different networks integrate with one another. The submission point is, however, valid but better reflected in additional commentary in the Integration and land use section.

				key freight corridors and the passenger networks as a key priority.		
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**Recommendations**

The submission point is accepted but it is better focused on P23 within the integration and land use section.

**Amendments**

Add a new sentence to the end of Page 23 as follows: **Well located intermodal freight terminals also have the potential to significantly reduce energy use associated with the freight task, by allowing more optimal rail / road shipping combinations to be realised."**

**20-14 Strategic Network – Canterbury region map**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Akaroa/Wairewa Community Board	24.02	20	14	The Board supports the retention of SH75 to Akaroa as a route that has strategic regional significance.		Support is noted.
Kaikoura District Council	10.5	20	14	The inclusion of the Inland Kaikoura Road on the Strategic Network map is supported for the route resilience, and oversize route options that it provides.		Support is noted.
West Coast Regional Council	3.2	20	14	Supports the identification of State Highway 73 as part of the strategic network.		Support is noted.

**Recommendations**

That support is noted

**Amendments**

None.

### 21-1 Strategic Network – Christchurch area map

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Dave Welch	8.1	21	1	Suggests that developing a western strategic rail corridor for freight that also opens up opportunities for passenger rail services.	Addition of a future western rail route to the Christchurch Area strategic network.	The submitters point is one that has not emerged from previous rail related studies that have been undertaken within the Greater Christchurch area and represents a significant departure from where future public transport thinking has been heading. As part of the strategy preparation process, the Kiwirail 10-year Turnaround Plan has been explicitly considered as the best statement of rail sector priorities.

#### Recommendations

That support is noted

#### Amendments

None.

### 23-1 Integration with land use

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.19	23	1	The submitter strongly endorses the need for transport planning and implementation to be closely integrated with land use.		Support is noted.
EECA	15.19	23	1	Supports recognition of the critical role of integrated land use and transportation system, but wishes to see reference made to earthquake recovery plans. Also wishes to see recognition of the importance of	Amend Page 23 as follows: " <b>Urban form and the way land use...</b> ", "...Good, <b>compact</b> integration and urban design provides a high level of access and mobility <b>and can reduce</b>	The RTC and the sub-group tasked with developing the RLTS have deliberated at length how the RLTS should interface with emerging recovery plans. The RLTS cannot prejudge the content or indeed, direct the content, of earthquake recovery plans

				compact urban form in reducing transport energy use.	<b>energy use.</b> , "...District Plans, the Christchurch Central City Plan and the Greater...", "...good integration. <b>Through these documents, local authorities can assist in improving the efficiency of local transport networks and layouts so that people and freight can move about more easily and efficiently.</b> "	prepared under the Canterbury Earthquake Recovery Act 2011. The role of the RLTS is to set the long term strategic direction for transport in the region. Recovery plans are short term documents that aid recovery. Other drafting points accepted.
Silver Fern Farms Ltd	4.9	23	2	Supports the statement that "Poor integration results in an inefficient transport system" and the statement that "Certain land uses and transport infrastructure can be incompatible and have a negative impact on the operation of the transport system" noting that reverse sensitivity is universally accepted as a significant resource management concern that must be effectively managed. Seeks retention of a recognition that incompatible land use can have an adverse effect on the transport system.		Support is noted.

### Recommendations

That support is noted in the first and third submission points.

The second point is accepted in part, as indicated. Several drafting amendments are proposed.

### Amendments

Insert text as follows: "**Urban form and the way land use...**", "...Good, **compact** integration and urban design provides a high level of access and mobility **and can reduce energy use.**", "...good integration. **Through these documents, local authorities can assist in improving the efficiency of local transport networks and layouts so that people and freight can move about more easily and efficiently.**"

### 24-13 Role of enforcement

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.20	24	13	Submitter notes that all the enforcements items listed are disincentives to driving and questions whether the strategy needs to find some balance by provision of positive incentives to use active modes.	Acknowledge need for positive incentives for some modes in the strategy as well as disincentive measures.	This point is a misinterpretation of the intent of the comments surrounding enforcement. The strategy, as developed, has been very careful to focus on "choice" as opposed to "compulsion". The enforcement measures listed in this section are not intended to be a disincentive to driving, but are an essential tool in the task of safe and effective network infrastructure management.

#### Recommendations

That the point is rejected for the reasons outlined.

#### Amendments

None.

### 25-1 Role of technology

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.20	25	1	Submitter supports the text as written.		Support is noted.
Royal NZ Foundation of the Blind	27.06	25	1	The submitter notes that technology has a role to play in making the public transport system more accessible, particularly for those with sight loss.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**26-1 Role of supporting action outside transport sector**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.21	26	1	Submitter strongly endorses this section of the strategy and notes that primary care Integrated Health Centres are but one example of co-located services that need effective integration with the transport network.		Support is noted.
Michael de Hamel	1.4	26	4	Support		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

### 27-1 Implementation (general)

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
New Zealand Historic Places Trust	5.3	27	1	Strategy could signal clearly that there is a need for agencies planning and/or constructing transport infrastructure to consult with NZHPT on heritage matters early in the project planning process.	The strategy references an early consultation requirement with NZHPT in heritage matters.	The strategy does not comment at all on project implementation details, but has focused deliberately on the policy signals that drive the mix of projects that are progressed to formal development. The early consultation that the submitter seeks would need to be implemented through a change in NZTA project design and appraisal procedures.

#### Recommendations

That the submission point is rejected for the reasons noted.

#### Amendments

None.

### 28-1 Staging

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sustainable Otautahi	21.03	28	1	Submitter would prefer to see a more aggressive transition scenario adopted, particularly around amending district plans to reflect the strategic direction.	Amend Land Use Planning implementation tables to see amended district plans being implemented in the medium-term, not long-term.	The point made is a fair one. As drafted, the implementation tables imply that it will take the entire medium term (Y4-12) to amend plans and only after the end of Y12 does implementation occur.

Sharon MacKenzie	11.27	28	4	Opposes shift in investment away from road improvements to other transport priorities and states that this will not support the larger, heavier freight vehicles that are described in the strategy, or provide for emergency vehicles.		The strategy is prioritising road maintenance for this very reason, as there is a pressing need for the region to better look after existing assets. What is not proposed is significant increases in road capacity - it is this form of investment that is proposed in the strategy to be redirected.
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**Recommendations**

The first submission point is accepted in part and an amendment to the implementation tables to reflect it is proposed. The second point is rejected for the reasons outlined.

**Amendments**

Amend medium term land use planning text to read: "...where feasible. **Implementation of amended plans occurs as soon as is practicable.**"

**29-1 Implementation (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Living Streets Canterbury	18.06	29	1	Submitter supports the definitions of short-term, medium-term and long-term in the strategy.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**29-7 Implementation – rural areas (road maintenance and renewals)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Akaroa/Wairewa Community Board	24.03	29	7	Submitter would like to see explicit mention of improving the safety of rural roads as part of the overall maintenance and renewals task, noting that the competing requirements of different types of recreational road users are often difficult to reconcile from a safety perspective.	Make explicit reference to safety improvements as part of the overall road maintenance and renewal task on rural roads.	Submission point is accepted and redrafting to reflect this is proposed.

**Recommendations**

The point is accepted and a drafting amendment is proposed.

**Amendments**

Amend road maintenance & renewals text as follows: "...as a priority throughout the region, **ensuring that the "safe systems" principles, together with opportunities to improve the road environment for all users are applied at all times.**"

**29-8 Implementation – rural areas (State Highway investment)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.12	29	8	Submitter notes that council's do have the ability to conduct unsubsidised work in the absence of funding from the NLTF.	Reword intervention table to read: " <del>Limited</del> <b>Restricted</b> due to short term expenditure focus on Roads of National Significance <b>however individual councils have the ability to commit to unfunded expenditure in consultation with the community.</b> "	The submitters point is attached to State Highway investment. It is very rare for local authorities to commit ratepayer funding toward State Highway investment projects, hence why this wording is related to local road investment. The statements made in the short term for both State Highway and local road investment reflect known intentions, given funding support availability from the NLTF.

Kaikoura District Council	10.6	29	8	Focus on RoNS does little to support rural Canterbury. Mention should be made of other State Highway studies such as the SH1 Blenheim to Ashley River - Implementation Plan.	Insert commentary that reflects other studies and their implementation plans that have more relevance to rural Canterbury.	It is accepted that the RoNS do not address many of the issues that other State Highway corridors seek to address and additional wording is proposed to reflect this.
West Coast Regional Council	3.3	29	8	Seeks that the short term focus in the RLTS also includes "improvements on strategic rural parts of the state highway network" to enable the programming of projects such as the Mingha Bluff to Rough Creek improvements near the front end of the next Canterbury Regional Land Transport Programme. The submitter notes that the Canterbury RLTP 2009-2012 identifies the Mingha Bluff to Rough Creek improvements as a nationally or regionally significant project likely to be recommended for inclusion in the next RLTP (2012-2015).		It is accepted that the RoNS do not address many of the issues that other State Highway corridors seek to address and additional wording is proposed to reflect this.

**Recommendations**

The first point is rejected for the reasons outlined.

The second and third points are accepted and additional text is proposed for the short term intervention box, as noted below.

**Amendments**

Insert additional sentence in Short-term State Highway investment box, as follows: **Further development and refinement of investment requirements flowing from State Highway Corridor Strategy studies.** Insert additional text to end of last sentence in Medium-term State Highway investment box as follows: ...passing lanes, **as outlined in State Highway Corridor Strategies.**

Amend short-term State Highway investment Box to also read: "Limited **improvements to rural parts of the State Highway network** due to focus..."

**29-12 Implementation – rural areas (public transport)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Disability Advisory Group	7.5	29	12	Supports total mobility being referenced.	That the strategy references the need for low floor total mobility vehicles for intra-regional trips.	The submission point is accepted. It is necessary for such vehicles to be low floor if their accessibility to the transport disadvantaged is to be realised.

**Recommendations**

The point is accepted and a drafting amendment is proposed.

**Amendments**

Amend medium/long term public transport text to read "...an increase in **accessible** community transport..."

**29-13 Implementation – rural areas (land use planning)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
New Zealand Transport Agency	23.02	29	13	Submitter notes that the strategy does not reference the Canterbury Regional Policy Statement as the guiding document through which to influence land use and transport integration issues - as they have to give effect to the RPS. Also notes that long-term response needs to be more about reviewing and refining planning documents, not just implementing them.	Insert explicit reference to the RPS in all intervention tables. Amend long-term references to "implementing" plans to read "implementing and <b>further refining</b> district plans".	The submission point is accepted and the RPS will be referenced accordingly to signal the document hierarchy.
New Zealand Transport Agency	23.03	29	13	Submitter considers that the strategy should be advocating for local authorities to collaborate with land developers to deliver the outcomes sought by the strategy.	Add commentary to the land-use planning intervention tables to reflect this activity explicitly.	The submission point is accepted. This role for local authorities is an important one, whatever may be contained within statutory planning documents.

**Recommendations**

That both points are accepted and textual amendments made as outlined below.

**Amendments**

Amend all boxes to reference RPS as well as district plans and also amend long-term box to read "Amended district plans are implemented **and further refined as required to deliver strategy objectives.**"

Add the following sentence to all land use planning boxes: "**Local authorities work collaboratively with developers to deliver on strategy objectives.**"

**30-1 Implementation – rural areas (railway investment)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Kiwirail	12.5	30	1	Submitter broadly supports the strategy for railway investment articulate by the strategy on pp 30, 32 and 34, but notes that in longer term additional investments might be required in response to emerging demands.		Support is noted.

**Recommendations**

Support is noted.

**Amendments**

None.

**31-9 Implementation – small urban areas (State Highway investment)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Kaikoura District Council	10.7	31	9	Focus on RoNS does little to benefit small urban areas in Canterbury.		Submission point is non-specific.

**Recommendations**

Submission point is noted.

**Amendments**

None.

**31-11 Implementation – small urban areas (walking and cycling)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Kaikoura District Council	10.8	31	11	Increased emphasis on walking and cycling is supported.		Support is noted.

**Recommendations**

Submission point is noted.

**Amendments**

None.

### 32-3 Implementation – small urban areas (railway investment)

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Kaikoura District Council	10.9	32	3	Rail investment should encourage freight use, but also improve usability for cyclists and commuters.	Add text to table to reflect the potential passenger usage of the rail corridor.	This is not the focus of Kiwirail's future investment thinking, with rail freight driving the vast majority of investment decisions.

#### Recommendations

That submission is rejected for reasons noted.

#### Amendments

None.

### 33-14 Implementation – Greater Christchurch (general)

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Living Streets Canterbury	18.07	33	14	Submitter disagrees that part of the short-term focus should be on completing planned roading capacity enhancements.	Remove this element of the short-term focus for Greater Christchurch.	One of the guiding principles underpinning the stated Strategic Direction for the strategy is 'finishing what we started'. It is for this reason that completion of planned roading projects within Greater Christchurch is included in the short-term focus.

#### Recommendations

That submission is rejected for reasons noted.

#### Amendments

None.

**33-32 Implementation – Greater Christchurch (walking and cycling)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.22	33	32	Submitter supports the stated need for walking, cycling and public transport to have higher levels of funding support over the life of the strategy, but suggests that there is no need to wait for the medium term to increase spending on active modes and associated education and marketing. Submitter suggests that earthquake recovery will facilitate this.	Bring forward increased rate of infrastructure development for walking and cycling (and associated marketing and education) to short term action.	The RLTS cannot be inconsistent with short-term funding priorities, as signalled by the Government Policy Statement on Land Transport Funding. The RTC and the sub-group tasked with developing the RLTS have deliberated at length how the RLTS should interface with emerging recovery plans. At the time of strategy preparation, the content of earthquake Recovery Plans for both the Central and wider city of Christchurch are unknown and not endorsed by government. As such, the RLTS cannot assume what the content and quantum of transport investments stemming from this might be.
Sharon MacKenzie	11.5	33	32	Having a mixture of cyclists and pedestrians does not encourage good road safety outcomes.		The intervention tables in Appendix G do not advocate for shared walking & cycling paths. The appropriateness of shared use facilities would need to be assessed on a case-by-case basis.
Sustainable Otautahi	21.04	33	32	Submitter suggests that cycling strategy for Greater Christchurch needs to be far more aggressive.	Insert short-term action for Greater Christchurch to revisit major roading projects to re-assess relevance in light of earthquake recovery plans.	The RTC and the sub-group tasked with developing the RLTS have deliberated at length how the RLTS should interface with emerging recovery plans. At the time of strategy preparation, the content of earthquake Recovery Plans for both the Central and wider city of Christchurch are unknown and not endorsed by government. As such, the RLTS cannot assume what the content and quantum of transport investments stemming from this might be.

**Recommendations**

That the first two points are noted and the third is rejected for reasons outlined.

**Amendments**

None.

**34-2 Implementation – Greater Christchurch (public transport)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Michael de Hamel	1.10	34	2	Seeks research on possible routes from Christchurch's central city to the University and airport, and to Rangiora and Rolleston, and between those points in the short term. Suggests that in many cases road and railway reserves will be available, but more land may be required, including extra width at some places where light rail will cross major roads so that 'divided grade' intersections can be constructed. Suggests that in some places pedestrian and cycle under or over-passes will be needed where they cross light rail routes. This should be taken into account in planning new cycle and pedestrian routes.		The text already refers to this in terms of "reviewing the service deliver model". Investigations should not prejudge the most appropriate mode in advance of a full understanding of the relative costs, benefits and other considerations attached to each one.
Michael de Hamel	1.11	34	2	Suggests that new road buses ordered and likely to still be in service when light rail becomes operational should be compatible with it in aspects such as ground clearance and step height.		This submission point relates to operational detail that would need to be considered if a LRT scheme for Greater Christchurch eventuated.
Michael de Hamel	1.12	34	2	Seeks the development of bylaws and possibly laws in the short term to give vehicles using light rail routes right of way at road and other crossings.		This submission point relates to planning detail that would need to be considered if a LRT scheme for Greater Christchurch eventuated.
Michael de Hamel	1.6	34	2	Suggests that public transport should be improved by investing in a light rail system based on battery and hybrid power systems with rubber wheels and rails constructed of concrete. In transitional situations, on growing routes, or at off peak times the same concrete route should be designed to be usable by conventional buses. Considers that this would reduce construction cost and the cost of vehicles compared to steel wheeled light rail.		This submission point relates to operational detail that would need to be considered if a LRT scheme for Greater Christchurch eventuated.

Michael de Hamel	1.7	34	2	Suggests that by 2042 the central area of Canterbury will have a population approaching 750,000 and Rolleston and Rangiora may both be towns of 50,000. Considers these will be prime destinations for light rail systems and that they may need to be connected to each other via a western route involving the construction of a new bridge across the Waimakariri. Suggests that without a light rail system these towns will generate unmanageable traffic flows in and out of the City.		The text already refers to this in terms of "reviewing the service deliver model". Investigations should not prejudice the most appropriate mode in advance of a full understanding of the relative costs, benefits and other considerations attached to each one.
Michael de Hamel	1.8	34	2	Seeks the inclusion of research and possibly development of suitable power systems and vehicles for a super-light rail system, using stored electric regenerative and/or hybrid power systems in the short term.		The text already refers to this in terms of "reviewing the service deliver model". Investigations should not prejudice the most appropriate mode in advance of a full understanding of the relative costs, benefits and other considerations attached to each one.
Michael de Hamel	1.9	34	2	Seeks that work be done in the short term towards identification and possible protection of key land required for a light rail system including amendments to railway and road legislation allowing and requiring land to be made available if required and identifying suitable 'park and ride' bases at Rolleston and Rangiora.		The text already refers to this in terms of "reviewing the service deliver model". Investigations should not prejudice the most appropriate mode in advance of a full understanding of the relative costs, benefits and other considerations attached to each one.
Sustainable Otautahi	21.06	34	2	Submitter wishes to see an investigation into viability of heavy rail passenger services listed as a short-term strategy implementation task.	Insert the following into the short-term public transport intervention table for Gtr Christchurch - <b>"Investigate viability for heavy rail passenger services within the Greater Christchurch sub-region"</b> .	The text already refers to this in terms of "reviewing the service deliver model". Investigations should not prejudice the most appropriate mode in advance of a full understanding of the relative costs, benefits and other considerations attached to each one.

**Recommendations**

That all submission points are noted and the final one is rejected in part.

**Amendments**

None.

**34-3 Implementation – Greater Christchurch (land use planning)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Winstone Aggregates	19.02	34	3	The submitter considers that provision needs to be included in the short-term land use planning response to support the increased and diverse freight requirements stemming from the response to the Christchurch earthquakes.	Amend the short-term land use planning intervention text to read: "...between transport modes, <b>flexible and extended operational hours for freight and associated land use activities which assist the rebuild of Christchurch - e.g. quarries, concrete plants, ports and manufacturing.</b> "	The RTC and the sub-group tasked with developing the RLTS have deliberated at length how the RLTS should interface with emerging recovery plans. The amendment sought are matters for the respective earthquake recovery plans and not the RLTS - which is a long-term, strategic planning document.

**Recommendations**

That the submission is rejected for reasons noted.

**Amendments**

None.

**34-7 Implementation – Greater Christchurch (supporting measures)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Brian Sandle	28.01	34	7	Submitter proposes that more explicit mention is made of the potential for "lift sharing" to be developed as a low cost method of increasing transport choice and also to improve utilisation of bus lanes.		The interventions to which the submitter refers are already incorporated within the detailed intervention tables in Appendix G (P34) but are referred to as 'rideshare' rather than 'lift share'. High occupancy motor vehicles (which is essentially what a successful lift share is) are explicitly considered within the Infrastructure Management measures outlined in Appendix G on P32.

**Recommendations**

That the submission is noted.

**Amendments**

None.

**35-1 Funding and Affordability - general**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.28	35	1	Submitter contends that the strategy is unaffordable.		The strategy assumes that Canterbury will continue to attract similar levels of funding as it has done in recent years, but that it will be possible for the region to redistribute this level of funding to different requirements.

**Recommendations**

That the submission is noted.

**Amendments**

None.

**35-7 Funding and Affordability – cycling and walking**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Living Streets Canterbury	18.05	35	7	Submitter notes that cost benefit analyses of spending on pedestrian and cycling infrastructure far outweighs spending on roading infrastructure.		The submitter is correct - typically, walk and cycle projects are low in terms of capital expenditure and convey significant benefits.

**Recommendations**

That the submission is noted.

**Amendments**

None.

**35-21 Funding and Affordability – quantum of funding**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Michael de Hamel	1.5	35	21	Support. Agrees with assumption that amount of spending on transport as a proportion of the		Support is noted.

				economy is not likely to change much.		
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**Recommendations**

That support is noted.

**Amendments**

None.

**36-1 Funding and Affordability – indicative distribution of funding**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.23	36	1	Submitter comments that the funding distributions for active modes and public transport, whilst increased, are still limited. Suggests that this profile misses out on many projects that would deliver high benefit : cost ratios.	Recommend that the economic benefits of investing in active transport be more fully investigated.	It has been noted in the strategy that there will need to be a shift in central government funding priorities to deliver this strategy. To a degree, the high benefit cost ratios associated with walking and cycling projects are already captured in NZTA project appraisal processes. What drives transport funding is the GPS - it is this that has to change in order to allocate a greater proportion of funds to walking and cycling projects.
Kaikoura District Council	10.10	36	1	General support for the funding direction signalled, subject to some minor changes.		Support is noted.
Kaikoura District Council	10.11	36	1	Long-term funding support for cycling and walking needs to be increased.	RLTS should signal increased spending on walking and cycling in the long term - relative to medium term.	The long-term is seen in the strategy largely as a continuation of the medium term shift in focus. There is nothing in the implementation areas of the strategy

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						that would warrant a step change in spending in these areas from Y12 onwards.
Kaikoura District Council	10.12	36	1	Increased capital and operating expenditure on rail is required - to facilitate better utilisation of the rail corridor and passenger related initiatives, such as bikes on trains.	RLTS should signal increased spending on rail over time.	The RLTS is taking its rail sector focus from the known aspirations and long-term plans of Kiwirail, which has a budget envelope from central government within which has to grow its business. Longer distance passenger travel by rail is not seen as a core part of Kiwirail's or this strategy.
Living Streets Canterbury	18.03	36	1	Submitter surprised to see such a low share of total future expenditure devoted to walking and cycling, given the contribution that these modes of transport will make to the strategy outcomes over the next 30 years.	Would like to see more future funding directed to walking and cycling.	The strategy is a transition strategy, which requires a change of funding priorities to be agreed upon with central government to deliver on its objectives. Compared to roading investment, the capital cost associated with walking and cycling projects are also relatively modest. Boosting the cycling share of total spending from 1% to around 3% and pedestrian spending from 5% to 6% will allow delivery of significantly improved facilities in these areas. Furthermore, the submitter should be aware that the long term roading capital expenditure is almost wholly focused on renewals. To signal more expenditure on walking and cycling is, on the opinion, of officers unrealistic given the funding environment in which the strategy will operate.
SPOKES	17.03	36	1	Submitter states that the medium and long term indicative funding ranges for cycling will not even achieve limited active transport goals - noting that the active transport elements of the		The Southern Motorway cycle corridor project is a very extensive, off-road project with associated high costs. Much can be done in the wider city for cycling within more modest cost envelopes.

				Christchurch Southern Motorway project are \$15m.		
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**Recommendations**

That the first, third and fourth points are rejected for the reasons outlined and that other points are noted.

**Amendments**

None.

**36-2 Funding and Affordability – distribution (road and rail – capital)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
SPOKES	17.04	36	2	Submitter asks that the final plan contains a statement that mandates that all roading projects include and fund walking and cycling elements as integral and required.	Include statement that mandates that all roading projects include and fund walking and cycling elements as integral and required.	The RLTS does not have the mandate to do what the submitter asks. It sets strategic direction for transport that is then interpreted by delivery agencies as they put together their Regional Land Transport Programmes. Any project within these programmes needs to conform to New Zealand Transport Agency requirements in terms of technical specification and value for money. To deliver what the submitter asks for will require a change in NZTA project specification rules.

**Recommendations**

That the submission point is rejected.

**Amendments**

None.

**37-1 Funding and Affordability – private costs (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.24	37	1	Submitter commends strategy for incorporating this material on private costs, but would like to see a comparison of active modes against motorised modes as well.	Include a statement recognising the cost differential for a user in Greater Christchurch between running a private vehicle and using other modes of transport.	The intent behind the inclusion of the section on Private Costs was to highlight the investment in transport that is required by society as a whole, not just the public sector. The Roles of Modes section alludes to the modal cost comparisons to which the submitter refers - noting that walking and cycling are inexpensive and practical means of undertaking short trip making, particularly within urban areas.

**Recommendations**

That the submission point is rejected for the reasons noted above.

**Amendments**

None.

**37-16 Funding and Affordability – private costs (aim to reduce)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.29	37	16	Submitter opposes strategy's aim to reduce the private costs of transport to Cantabrians, as this is a cost that should be managed by the individual.		The submitters' opinion is noted. The intent behind the inclusion of the section on Private Costs was to highlight the investment in transport that is required by society as a whole, not just the public sector.

**Recommendations**

That the submission point is noted.

**Amendments**

None.

**38-1 Monitoring**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.25	38	1	CDHB strongly supports the collection and analysis of monitoring data as described here and in Appendix J.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**Amendments**

None.

## A2 Glossary

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.26	A2	1	No definitions for "sustainability" or "urban design principles" are given, despite both terms being used in the strategy.	Include definitions for both terms.	The submission point is valid. Definitions for both terms should be included.

### Recommendations

That definitions for the two terms identified are inserted to the glossary.

### Amendments

Insert the following definitions: "**Urban design principles - Design principles that confirm to the best practice outlined in The New Zealand Urban Design Protocol.**" "**Sustainability - In the transport sector, this is taken to mean finding ways to move people and goods in ways that reduce the impact upon the environment, the economy and society.**"

## A12-1 Transition Scenario

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sustainable Otautahi	20.02	A12	1	Submitter supports the adoption of a transition scenario that will see the region move towards greater emphasis on energy resilience.		Support is noted.

### Recommendations

That support is noted.

**Amendments**

None.

**A17-4 Providing transport options (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.02	A17	4	Submitter supports the acknowledgement in the strategy that transport options for those in rural areas are not always readily available.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**A17-8 Providing transport options (key challenge)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.03	A17	8	Submitter opposes the wording of the key challenge on grounds that it is not referenced to identified 'need'.	Amend wording of key challenge to read: " <del>Supplying a range of</del> <b>Prioritising potential</b> transport and non-transport options <b>on the basis of the cost effectiveness of these options and the manner in which they</b> to ensure the accessibility needs of all people and	The key challenges were agreed early in the strategy development process and have driven the subsequent strategy that has emerged. The submitter has noted elsewhere that the strategy correctly focuses on appropriate solutions in rural areas, rather than "one size fits all" or "build it and they will come" solutions. To this end, rewording the key challenge would not influence

					businesses can be met".	the resultant strategy.
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**Recommendations**

That the submission is rejected for the reasons outlined.

**Amendments**

None.

**A18-1 Supporting freight and tourism (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.04	A18	1	Submitter supports acknowledgement that the efficient movement of goods and services is essential to support regions' economic wellbeing.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**A18-7 Funding and affordability (key challenge)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.05	A18	7	Submitter contends that it is unnecessary to constrain future roading investment decisions by wording the key challenge in this manner.	Amend wording of challenge as follows: "Delivering high quality transport options that meet the needs of all Cantabrians in an affordable manner within the funding available."	Delivering transport choice needs to have some grounding in fiscal reality and the "funding available" from whatever source will dictate what is done.

**Recommendations**

That the submission is rejected for the reasons outlined.

**Amendments**

None.

**A19-3 Managing private vehicle growth (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.34	A19	3	Encouraging more people to walk and cycle will work against stated challenge of improving road safety to all users.		Improving the safety environment for pedestrians and cyclists is a key step in encouraging more of them. Greater volumes make other road user more aware of their presence, which, over time, will improve awareness and thus safety for pedestrians and cyclists.

**Recommendations**

That the submission is noted.

**Amendments**

None.

**A19-4 Managing private vehicle growth (key challenge)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.35	A19	4	Submitter queries whether statement that vehicle drivers largely cause cycle casualties refers to all vehicles or just cars.		It is confirmed that the text refers to "all vehicles".

**Recommendations**

That the submission is noted and the clarification requested is provided above.

**Amendments**

None.

**A20-2 Managing health impacts (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.27	A20	2	The statement that says that most people do not recognise the strong link between transport and public health policies suggests that educational campaigns on travel choice attempt to reinforce the message around the linkages.	Include awareness information on the positive health outcomes of active mode choice when undertaking educational campaigns.	This is a valid point that is not explicitly capture in the implementation interventions listed in the Appendix G. Additions to text are supported to reflect this.

**Recommendations**

That the implementation tables are amended to capture this point. Amend Social Marketing commentary in interventions table (several locations) to acknowledge the health benefits of active travel, as well as "normalising" it.

**Amendments**

Reword social marketing text as follows: "Social marketing programmes **are** initiated to **acknowledge the health benefits of active transport and** promote behaviour change by normalising use of active modes, public transport, rideshare, etc."

**A20-7 Managing environmental impacts (key challenge)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.06	A20	7	Submitter believes that this is a central government task, so there is no need for the RLTS to list it as a key challenge.	Delete key challenge.	Whilst central government will provide many of the tools to deliver against this challenge, the regions of New Zealand, through their transport strategies, have a responsibility to act upon their share of the total in an appropriate manner.

**Recommendations**

That the submission is rejected for the reason outlined.

**Amendments**

None.

**A21-3 Network security (key challenge)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Federated Farmers	25.07	A21	3	Submitter notes that the region's roading infrastructure is integral to its social wellbeing.		Submission point is noted.

**Recommendations**

That the submission is noted.

**Amendments**

None.

**A21-6 Oil security and volatility (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.22	A21	6	Challenges the statement that New Zealand is at risk of suffering from oil supply security and fuel price volatility.		Appendix D cites a number of external sources that support the material included in the strategy. Even if New Zealand develops more of its own oil reserves, this oil will be traded on the world market and subject to the price volatility and supply issues outlined in the documents referenced in the Appendix.

**Recommendations**

That the submission is noted.

**Amendments**

None.

**A21-7 Oil security and volatility (key challenge)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.28	A21	7	Submitter disagrees that moving to a transportation system that is less reliant upon oil is something for the longer term.	Reword the last sentence on A21 to read "Moving to a system of transport that is less reliant upon oil needs to begin immediately and continue into the medium and longer term."	The strategy has reviewed several source documents that are quoted in the footnote on Page 21 of the Appendix. Regardless of the perceived urgency of this issue, the transportation system cannot evolve to an oil free alternative in the short term. It is for these reasons that the key challenges are written in the manner that is in the strategy currently.

**Recommendations**

That the submission is rejected for the reasons outlined.

**Amendments**

None.

**A22-2 Managing impacts of population change (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.29	A22	2	Submitter notes that Maori and Pacific Island populations are also forecast to become a greater part of the overall population and this will include a large number of children and young people who will need to be factored into transport planning.	Add a sentence into this section of Appendix D that recognises the personal mobility needs of young people and children.	The submission point is valid and some additional wording to reflect this demographic change is proposed.

### Recommendations

That the submission is accepted and the wording amended as indicated below.

### Amendments

Add an additional paragraph to end on the discussion on "managing the transport impacts of anticipated population change as follows:  
**"Another change that is envisaged is the growth in the numbers of young Maori and Pacific Island children in the region."**

### A25-1 Regional Outcomes – GHG emissions

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.04	A25	1	Submitter wishes to see more explicit reference to the intent of NZECS in the material presented in Appendix F of the strategy.	Amend Appendix F (page 25) as follows (bold and underlined): "Reduced greenhouse gas emission from use of the domestic transport system. Description - <b><u>New Zealand's transport system relies primarily on oil which results in significant transport related greenhouse gas emissions. More efficient and greater use of technologies such as electric vehicles and alternative transport fuels have a valuable role to play in reducing transport related greenhouse gas emissions.</u></b> Any transport system that burns fossil fuels, such as petrol, directly contributes to greenhouse gas emissions. Even forms of motorised transport that are often regarded as being "environmentally friendly" such as electric vehicles, will contribute to greenhouse gas emissions, particularly if the energy used to charge the vehicle is sourced from fossil-fuelled power stations. Rationale - "...this goal. <b><u>New Zealand is actively working to secure an internationally binding agreement to supersede the Kyoto Protocol post 2012.</u></b> The New Zealand Emissions..." <b><u>Increased transport sector efficiency and increased use of renewable energy provide an opportunity to reduce transport related greenhouse gas emissions. The direct use of sustainably-produced biofuels for example have a role to play and have available in some parts of New Zealand since 2007. In addition, electric vehicles have an important role to play in the future given the high and increasing percentage of New Zealand's electricity generated from renewable sources. Around 70% of New Zealand's electricity is generated from renewable resources and the Government's target is that 90% of electricity will be generated from renewable energy by 2025 "</u></b>	The submission point is valid. The Draft RLTS was approved for consultation prior to the release of the NZECS. The wording amendments sought by the submitter are accepted.

**Recommendations**

That the submission is accepted and the wording amended as suggested by the submitter.

**Amendments**

Amend Appendix F as indicated by submitter.

**A25-3 Regional Outcomes – Improved resilience**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.04	A25	3	Submitter supports this outcome but seeks minor amendments to recognise the role of biofuels in ensuring resilience and security of supply.	Amend Appendix F (page 25 and 26) as follows: "...heavily reliant on <b>imported</b> petroleum...", "...fossil fuels <b>through increasing the availability and use of renewable energy.</b> Canterbury...", "...such changes. <b>By using sustainably produced biofuels and electric vehicles to run our transport fleets we can - improve security of supply and lessen our reliance on imported oil. Electric vehicles have an important role to play given the high percentage of New Zealand's electricity generated from renewable resources.</b> One of...", "... to oil would <b>reduce exposure to</b> somehow insulate individuals and businesses from the effects..."	The submission point is valid. The Draft RLTS was approved for consultation prior to the release of the NZEECS. The wording amendments sought by the submitter are accepted.

**Recommendations**

That the submission is accepted and the wording amended as suggested by the submitter.

**Amendments**

Amend Appendix F as indicated by submitter.

**A26-5 Regional Outcomes – Improved land use and transport integration**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.05	A26	5	Submitter supports this outcome.		Support is noted.

**Recommendations**

That the submission is noted.

**Amendments**

None.

**A27-3 Regional Outcomes – Improved personal security (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.30	A27	3	Submitter endorses the broadening of this safety outcome to all users and notes that they support behaviour change campaigns that promote the positive aspects of active modes.	Recommend that behaviour change interventions move away from focus on cars to promote desirability of active transport options.	The statement made by the submitter is correct, but this text is about safety messages and not about travel behaviour change. The latter is an important element of the strategy and is captured in other areas.
Sharon MacKenzie	11.33	A27	3	Submitter opposes the inclusion of the comment that "perception of safety is in many ways more important than actual safety" on grounds that it will discourage the media from reporting incidents.	Remove this text from Appendix D	The submitter expresses a view that is not shared by officers. It is highly unlikely that anything written in the RLTS will influence media to react in the manner that the submitter suggests. It is a well research fact that one of the main barriers to children, for example, using active transport is the perceived safety risk - a perception that is not borne out by the actual level of risk.

**Recommendations**

That the first point is noted and the second is rejected for the reasons outlined.

**Amendments**

None.

**A27-5 Regional Outcomes – active travel outcomes**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.06	A27	5	Submitter supports the outcomes but suggests that they could be combined, given that they are implicitly related.	Combine two outcomes on travelling by active means into one.	The outcomes are separate for a specific reason - there is an important distinction between getting more of the population to do some active travel and getting already active members of the population to do more.

**Recommendations**

That the submission is rejected for the reasons outlined.

**Amendments**

None.

**A28-7 Regional Outcomes – energy efficiency**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.08	A28	7	Submitter seeks some minor drafting changes to better describe how this outcome maps to government priorities.	Amend wording in Appendix F (pages 28 and 29) as follows: "...by encouraging <b>better driver behaviour, encouraging</b> trips to be taken by more energy efficient modes <b>and technologies</b> and encouraging...", "...transport affordability <b>and resilience</b> , there is a need to	Suggested insertions improve legibility.

					drive more efficiently, make better use of low energy modes and vehicle technologies, ensure development..."	
Sharon MacKenzie	11.16	A28	7	Opposes aim of strategy to reduce consumer choice and force local retail purchasing.		This is not the intention of the strategy. The intent of this aspect of the strategy is to encourage the availability of more local destinations, rather than force consumers to use certain outlets.

### Recommendations

That the first submission point is accepted to improve legibility of the text.  
That the second point is noted.

### Amendments

Amend text as per submitters' suggestion.

### A29-5 Regional Outcomes – freight hubs

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.09	A29	5	Submitter supports the outcome, but suggests that as well as "protecting and maintaining" freight hubs, the strategy should be seeking to promote consolidation and centralisation of facilities to increase the use of rail for freight.	Amend the outcome described on P9 of the strategy as follows: "Freight hubs are protected and maintained <b>and integrated within strategic transport networks.</b> " Amend Appendix F (page 29) as follows: "Freight hubs are protected and maintained <b>and integrated within strategic transport networks.</b> ", "...freight hubs. <b>This outcome also seeks to support and encourage a network of integrated multi-modal freight hubs in the region with a focus on existing freight areas. Industry will also be encouraged to</b>	The section within the strategy on the importance of land use and transport integration captures many of the efficiency issues to which the submitter eludes. To make this change moves the strategy beyond protection and support for existing, commercially developed freight hubs and into the territory of "picking winners" and then promoting their use. This is an area that has not been well supported around the RTC table in the past, nor through the Freight Working Group that has served the RTC in the past. Many of the current freight hubs are intermodal and are supported by RLTS policy. There appears to be

					consolidate and centralise freight transportation to reduce the energy use per tonne of freight moved per kilometre.", "...their operations. Freight hubs integrated with the rail network can provide important freight networks and can facilitate greater use of rail."	no need in the Canterbury context to go beyond this policy stance and begin to promote certain sites.
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**Recommendations**

That the submission is rejected for the reasons outlined.

**Amendments**

None.

**A29-7 Regional Outcomes – connectedness**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.31	A29	7	Submitter notes that connectness also enhances social cohesion, which helps build resilient communities.		The submitters point is noted.
EECA	15.10	A29	7	Submitter supports the outcome, but suggests that it should be extended to encompass cycle connectivity as well.	Amend Appendix F (page 29 - 30) as follows: "This outcome seeks to promote policies that will improve the 'walkability' and 'cycleability' of urban centres and local neighbourhoods within Canterbury. To improve 'walkability' and 'cycleability' new subdivisions need to have short distance walking and cycling access...", "their journey. <b>There are also significant opportunities to improve connectedness for cycling.</b> Community...".	Walking as a mode of transport is quite different from cycling, with the former tending to be for relatively short trips, where the walkability of the urban and suburban environment is critical to keeping the overall trip time short and thus making it an attractive transport choice. The same is not true for cycling. To introduce "cycleability" here would detract from the key message that is being conveyed around walking.

**Recommendations**

That the first submission point is noted.

That the second point is rejected for the reasons outlined.

**Amendments**

None.

**A30-2 Regional Outcomes – travel choice**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.11	A30	2	Submitter supports the outcome.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**A30-4 Regional Outcomes – transport disadvantaged**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.30	A30	4	Submitter opposes the creating of a new form of beneficiary - the transport disadvantaged.	Remove references to "transport disadvantaged"	The Act under which this strategy is prepared requires it to consider the needs of the transport disadvantaged. The definition of this group is taken directly from central government legislation and has not been created by this strategy.

**Recommendations**

That the submission is rejected for the reasons noted.

**Amendments**

None.

**A31-1 Interventions – Greater Christchurch short-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.32	A31	1	Submitter strongly endorses early investment in quality cycling facilities and cycle parking to encourage local trip making within the Central City.		Support is noted.
SPOKES	17.07	A31	1	Submitter proposes a list of studies that they wish to see incorporated within the strategy.	Insert the following investigations into the strategy: the pent up demand for active transport, the cost effective contribution which active transport offers for congestion relief, likely projections for future energy costs, the health impacts of car based transport, the detriment to the local economy of spending billions on car based transport requiring massive overseas imports, the detriment and cost to the environment, timely investigation and reporting on the economic and social costs of poor land use prior to approvals being granted.	Where 'investigations' have been noted in the strategy, they are at a strategic level that is compatible with the focus on a 30-year strategy. The studies proposed by the submitter are very detailed and not deemed appropriate for inclusion in the intervention tables of the document.
SPOKES	17.08	A31	1	Submitter proposes that the strategy includes the several further activities in its intervention tables to promote active transport projects.	Insert additional items into the intervention tables under short, medium and long term headings - advocate that all transportation projects include walking and cycling elements as integral and required, continued support for the Active and Passenger Transport Working Group, continued support for the Canterbury Active Transport Forum.	The first part of this submission point is related to the project specification, design and appraisal processes - these are the responsibility of NZTA, not the RLTS. The points in relation to the Active and Passenger Transport Working Group and Canterbury Active Transport

						Forum are related to Environment Canterbury's Annual Plan process, as it is this organisation that resources these groups, not the RTC or the RLTS.
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**Recommendations**

That the first submission point is noted and the second and third are rejected for the reasons outlined.

**Amendments**

None.

**A31-2 Interventions – Greater Christchurch medium-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.25	A31	2	Opposes removal of long-stay parking as to do so will hurt earthquake recovery in Christchurch, but making it a less attractive destination for out of town visitors.		This is a valid concern and Christchurch City Council's parking strategy will need to carefully address this issue, through adequate provision of quality alternatives, prior to any widespread changes being introduced.
Sharon MacKenzie	11.26	A31	2	Submitter suggests that removal of long-stay parking will work against a number of strategy objectives, including safety, fuel efficiency and supporting the economy.		The submitter suggests a causal relationship that is not borne out by available evidence. What the submitter states might be true in the absence of quality transport alternatives to the private motor vehicle, but the provision of these alternatives, prior to removal / relocation of long-term parking is a critical success factor the strategy.

**Recommendations**

That the submission points are noted.

**Amendments**

None.

**A32-2 Interventions – Greater Christchurch medium-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Kiwirail	12.6	A32	1	Submitter notes support for Clifford Bay ferry terminal.		Support is noted.
Sharon MacKenzie	11.31	A32	2	Submitter is concerned that the emergency services do not feature in the user hierarchy defined in Appendix G.		The proposed classification hierarchy is for general road space use / allocation. There is an assumption in any road classification system that emergency service vehicles have priority regardless of this hierarchy.

**Recommendations**

That the submission points are noted.

**Amendments**

None.

**A33-2 Interventions – Greater Christchurch medium-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sustainable Otautahi	21.05	A33	2	Submitter would like to see more explicit mention of pedestrian safety throughout the strategy and specific mention of pedestrian priority at key	Insert the word "Priority" at the beginning of the pedestrian crossing facilities commentary on Page A33.	The RTC took a decision during the strategy development process, that all sought outcomes have equal weight within the strategy - in effect, there is no priority order for any outcome,

				locations within the Greater Christchurch implementation tables.		including the safety related ones.
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**Recommendations**

That the submission is rejected for the reasons outlined.

**Amendments**

None.

**A34-1 Interventions – Greater Christchurch short-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.33	A34	1	Submitter strongly supports ongoing review of public transport services to support evolving travel patterns in short term.		Support is noted.
CDHB	13.34	A34	1	Submitter argues that innovative total mobility services should be a medium term rather than long term intervention, as the need will emerge long before the start of the long term in Y13.	Bring forward commentary around innovative mobility services to the medium term.	Submission point is accepted. There is no need to 'wait' for the introduction of such innovative services.
Sharon MacKenzie	11.37	A34	1	Submitter opposes spending money on "investigations" when their inclusion in the strategy means that they are a foregone conclusion.	Delete investigations from intervention tables.	Investigations into new and innovative forms of transport are required to ensure that they are appropriate and affordable in the Canterbury context. There is no commitment to implement the activities until they have been investigated in an appropriate manner.

**Recommendations**

That support is noted for the first point.

That the second point is accepted and the textual replacement outline below inserted into the intervention table.  
 That the third point is rejected for the reasons outlined above.

**Amendments**

Replace medium term "Total Mobility services provided as present" with "**Mobility services provided, using innovative approaches as necessary, to reduce social exclusion and transport disadvantage**"

**A35-1 Interventions – Greater Christchurch short-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.32	A35	1	Submitter is concerned that by promoting walking, the strategy will be exposing Cantabrians to increased risk of criminal activity.		Crime associated with pedestrians is often a result of the lack of other pedestrians around to deter criminal acts. If the strategy encourages more people to walk, then this will increase the numbers of people on the streets and thus reduce the opportunity for crime to take place.
Sharon MacKenzie	11.36	A35	1	Submitter sees these implementation tools as an attack on private car ownership.		The intention of the strategy is to reduce parking provision over time as the need for households to own multiple vehicles is removed - as more transport choice becomes available for Cantabrians. The strategy fully acknowledges that private vehicle travel will remain the dominant form of transport for many Cantabrians over the life of the strategy.

**Recommendations**

That both points are noted.

**Amendments**

None.

**A35-2 Interventions – Greater Christchurch medium-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.35	A35	2	Submitter strongly supports the pricing measures outlined.		Support is noted.
Sharon MacKenzie	11.14	A35	2	Opposes interventions that promote investment in smaller vehicles and other forms of transport and thus discourage ownership and use of large vehicles.		The strategy acknowledges that there is a role for large engined vehicles for some trips for some Cantabrians, but wishes to see the overall vehicle fleet evolve to a more diverse and fuel efficient mix over time. The submitter disagrees with this strategy in this respect.
Sharon MacKenzie	11.15	A35	2	Cantabrians do not need the taxation structure to guide their vehicle purchasing decisions as they know that small vehicles are more economical to run.		Taxation structures in other countries are widely used to influence the range and prices of vehicles that manufacturers and dealers offer to the market. The submitter disagrees with this role for government.
Sharon MacKenzie	11.17	A35	2	Opposes initiatives to remove ownership of vehicles and encourage vehicle co-operatives.		The intervention tables promote tools that will allow individuals to pursue joint ownership if they wish. The strategy does not advocate for the removal of the right to own and operate a motor vehicle.

**Recommendations**

That all points are noted.

**Amendments**

None.

**A36-2 Interventions – Greater Christchurch medium-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.36	A36	2	Submitter endorses all the measures proposed, and their staging.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**A36-2 Interventions – Greater Christchurch medium-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.36	A36	2	Submitter endorses all the measures proposed, and their staging.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**A37-1 Interventions – Greater Christchurch short-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.37	A37	1	Submitter would like to see immediate support for workplace and school travel plans.	Recommend short term and increased support for school and workplace travel plans.	The short-term interventions listed reflect the reality of the GPS on Land Transport Funding that is in force at time of preparation of this strategy. This GPS is heavily focused on Roads of National Significance and thus support for travel planning as desired by the submitter is limited, hence the wording chosen in the strategy.

**Recommendations**

That submission is rejected for reason stated.

**Amendments**

None.

**A37-2 Interventions – Greater Christchurch medium-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.38	A37	2	Submitter wishes to see smokefree bus shelters.	Add smokefree bus shelters as an implementation intervention in the short term.	The vast majority of bus shelters in the region are not fully enclosed. We question how such an intervention would be enforced.

**Recommendations**

That submission is noted.

**Amendments**

None.

**A39-2 Interventions – small urban areas medium-term**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Sharon MacKenzie	11.19	A39	2	Opposes consideration of bus services in Ashburton if they will involve any ratepayer subsidy.		The strategy states that scheduled services will be "considered" for Ashburton depending upon the extent of urban growth. Any proposal for scheduled services would be done in full consultation with affected ratepayers, as is the case for existing scheduled services in Christchurch and Timaru. The submitter disagrees with this process.

**Recommendations**

That submission is noted.

**Amendments**

None.

**A46-1 Demand management strategy (general)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.39	A46	1	Submitter supports approach outlined.		Support is noted.

**Recommendations**

That submission is noted.

**Amendments**

None.

**A46-3 Demand management strategy (detail)**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.13	A46	3	Submitter suggests that the demand management strategy need strengthening.	Amend Appendix H by including reference to specific actions that can be undertaken, e.g. promoting and supporting the roll out of travel behaviour change plans to businesses, schools and communities, which provide information and facilitate travel mode choices including public transport, carpooling, walking, cycling and teleworking.	The Appendix as currently drafted states that the strategy supports the development of travel plans. It is not clear why all the detail outlined in this submission point is required.

**Recommendations**

That the submission is rejected for the reasons outlined.

**Amendments**

None.

**A49-4 Targets and monitoring - resilience**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.40	A49	4	Strongly support the proposed indicator and method of data collection.	Ensure that indicators is added to monitoring programme as proposed.	Support is noted.

**Recommendations**

That the submission is noted.

**Amendments**

None.

**A50-5 Targets and monitoring – safety**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.41	A50	5	Strongly support the gathering of monitoring data around safety aspects that is broken down by mode.		Support is noted.

**Recommendations**

That support is noted.

**Amendments**

None.

**A52-2 Targets and monitoring – active travel**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.43	A52	2	Endorse the differentiation in monitoring between already active people becoming more active and more people achieving the minimum.		Endorsement is noted.

**Recommendations**

That the endorsement and support is noted.

**Amendments**

None.

**A52-3 Targets and monitoring – 30 mins a day active**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
CDHB	13.42	A52	3	Note that 30 mins a day is a minimum and should not be the ultimate aim.		Submission point is noted.

**Recommendations**

That the point is noted.

**Amendments**

None.

**A53-3 Targets and monitoring – energy efficiency**

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.12	A53	3	Submitter comments that proposed monitoring indicators and targets may not be explicitly linked to improvements in energy efficiency. Submitter proposes some additional indicators and notes that EECA is willing to work with Council to establish and monitor them.	Amend Appendix J (page 49) by inserting the following in regard to improved resilience of the transport system to external changes: <b>Number of alternative fuel supply sites in the region (e.g. retail sites offering low biofuel blends or wholesale sites with high biofuel blends). Number of vehicles which can use high biofuel blends. Number of electric vehicles.</b> Amend Appendix J (page 53) by inserting the following additional targets for increasing energy efficiency per trip: <b>Public Transport MJ/pax. km - National baseline 2009: Car = 2.01, bus = 0.86, rail = 0.85. Freight Transport MJ/tonne km - National baseline 2009: Road freight = 3.6, Rail freight = 0.56. No targets envisaged.</b>	The construction of effective monitoring indicators for energy efficiency has been driven largely by data availability and it is acknowledged that the indicators proposed may not be driven entirely by energy efficiency measures. The additions proposed by the submitter are viewed very positively, as is the offer of the submitter working with Council to develop and monitor them on an ongoing basis.

### Recommendations

Insert new indicators as suggested by submitter, noting that their incorporation into an ongoing monitoring programme is subject to the ability to source and fund the collection and analysis of appropriate data.

### Amendments

Amend Appendix I as per submitters' proposal.

### A55-2 Targets and monitoring – transport disadvantaged

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
Royal NZ Foundation of the Blind	27.05	A55	2	The RNZFB wishes to work with the regional council to develop the proposed performance measures in conjunction with the disability sector.		The offer from the submitter is appreciated and will be acted upon as the new monitoring programme is developed.

### Recommendations

That the point and offer of support noted.

### Amendments

None.

### A59-10 Legislative context - NZEECS

Submitter	Point ID	Page	Line	Submission Point	Amendment Sought	Evaluation
EECA	15.21	A59	10	Submitter supports reference to the NZEECS and seeks amendments to update this section to accord with the recently adopted 2011 NZEECS.	Replace current text on NZEECS with the following: <b>The New Zealand Energy Efficiency and Conservation Strategy 2011-2016 (NZEECS) sets the Government's strategic direction for energy efficiency and</b>	The submission point is valid. The Draft RLTS was approved for consultation prior to the release of the NZEECS. The wording amendments sought by the submitter are accepted.

					renewable energy across all sectors. For the transport sector, the NZEECS sets the objectives for a more energy efficient transport system, with greater diversity of fuels and alternative vehicle technologies.	
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**Recommendations**

As noted, the Draft RLTS was signed off for consultation prior to release of the NZEECS, so text should be updated to accommodate new wording now that it is available.

**Amendments**

Replace current text with that supplied by submitter.