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Tēnā koutou

Canterbury Regional Council submission on the draft Government Policy Statement on land transport 2024

The Canterbury Regional Council thanks the Ministry of Transport for the opportunity to provide feedback on the draft Government Policy Statement on land transport 2024 (GPS). This letter and the attached response to your questions make up the Council's submission.

Our region is New Zealand's largest by land area and second largest by population. We house 12% of the country's population, more than half of the South Island's population, contribute 12% of the national GDP, and have more than 16% of the national roading network. We are home to the second largest and one of the fastest growing urban areas in New Zealand – Greater Christchurch. Canterbury supports a strong and diverse regional economy that is critical to national economic growth, productivity, and prosperity.

We remain concerned that the crucial role Canterbury's transport networks play in unlocking New Zealand's economic potential and ensuring quality of life, is not sufficiently reflected in this draft GPS. While there are elements of this draft GPS we support, there are risks of the region receiving an unequitable share of national funding, which has been the case in previous National Land Transport Programmes.

We ask that the importance of investing in Canterbury, and more broadly the South Island, is more clearly recognised in this GPS to inform future funding decisions. We support the joint submission provided by the Canterbury Mayoral Forum and Canterbury Regional Transport Committee that provides further views on the key transport issues for Canterbury in the context of this draft GPS.

We are deeply concerned by the lack of mention of public transport for Canterbury in this draft GPS. This is a striking omission, particularly given Greater Christchurch is a major urban centre in New Zealand that has and continues to experience significant growth. The absence of any commitment to delivering improved public transport in Greater Christchurch does not reflect the importance of this urban area to Canterbury, the South Island and New Zealand, and the role of public transport to enabling ongoing growth and productivity.

We ask that the Greater Christchurch Public Transport Futures programme – the agreed programme of public transport improvements in Greater Christchurch – is identified in the GPS as a major public transport project alongside those identified in Auckland and Wellington. The delivery of this programme is critical to the future of Greater Christchurch as recently endorsed in the Greater Christchurch Spatial Plan and requires the commitment from all partners for its effective delivery.

We recognise that there are constraints to national land transport funding that mean there is simply not enough money to support all our transport needs and aspirations in New Zealand. That's why we encourage Government to prioritise smart investment in Canterbury that unlocks productivity in New Zealand's second-largest city. We also urge the Government to progress its work on the Future for Transport Revenue System review with haste to ensure we have a more sustainable way forward when it comes to the 2027 GPS. We are keen to partner with the Government on this review and the opportunity for more funding levers for local government in the future.

We thank all those involved in preparing this draft GPS document and for the opportunity to provide feedback. If you have any questions about the points raised in our submission, please contact Jesse Burgess, Senior Strategy Manager at the Canterbury Regional Council on 027 381 5102 or, jesse.burgess@ecan.govt.nz.

Yours sincerely



Peter Scott
Chair, Canterbury Regional Council

Canterbury Regional Council feedback on the draft Government Policy Statement on land transport 2024

1. Do you agree with the strategic priorities and direction that are outlined in the draft GPS 2024?

We support the strategic priorities as outlined in the draft GPS; however, encourage further thought be given to the role of transport to reducing emissions and improving accessibility for our communities and the contribution these can have on achieving the sought outcomes of this GPS. The priorities of this draft GPS have little focus on these key transport-related outcomes, which is a significant omission and should be given more attention in the final GPS.

Strategic investment in public transport activities will enable further transport choices, reduce congestion, contribute to our nation's standard of living, and bring benefits for economic growth and productivity. We urge that greater emphasis be given to the role public transport can play in achieving the GPS's strategic priorities.

We support the emphasis on *Increased maintenance and resilience* throughout this draft GPS. Maintenance is the top investment priority for Canterbury, reflected in both the 2021-31 Canterbury Regional Land Transport Plan (RLTP) and the draft 2024-34 Canterbury RLTP. A well-maintained roading network benefits all transport-related outcomes.

Increasing the resilience of our transport network is critical to Canterbury and the South Island. Our region has a number of strategic routes that are highly vulnerable to disruption from natural hazards – greater recognition of our resilience challenges is something for which we have long advocated.¹

The Canterbury Mayoral Forum's *Plan for Canterbury* highlights the significant cost of improving the resilience of our flood protection schemes; to protect not only our local assets, but also national state highway and rail assets, as articulated in *Before the Deluge* prepared for Te Uru Kahika². The importance of continuing to invest in flood protection schemes was highlighted by the flooding of the Rangitata River in 2019, which cut access across both SH1 and SH79, and the rail corridor, meaning goods could not get through to the lower South Island.

2. Do you agree with the overarching priority of economic growth and productivity outlined in the draft GPS 2024?

We recognise the crucial role of Canterbury's transport networks in enhancing our quality of life and unlocking the region and New Zealand's economic potential. We recognise and

¹ The Waka Kotahi National Resilience Programme Business Case (for state highways) identifies the top of the South, West Coast, Canterbury and Otago as four of the top five at-risk regions in New Zealand by number of natural hazard risks, and the top four regions by criticality (the number of risks with a major or critical risk rating). See Appendix F (pages 7-8) [here](#).

² www.resilientrivers.nz/resources.

support the importance of ensuring a holistic approach be applied to transport investment that is aligned with regional and local government planning processes. This will generate better economic value for the taxpayer and ratepayer and enable greater productivity with a wider range of outcomes achieved.

The Ministry of Transport's *Transport Outcomes Framework*³ sets a purpose for the transport system centred around the wellbeing of New Zealanders and the liveability of places. It outlines five outcome areas to contribute to this purpose: inclusive access, healthy and safe people, economic prosperity, environmental sustainability, and resilience and security.

We support the emphasis on economic growth and productivity in this draft GPS but note that any significant projects considered under this strategic priority should be assessed in a balanced manner alongside other outcome areas, such as those outlined in the *Transport Outcomes Framework*. The key outcomes of environmental sustainability, inclusive access and health benefits associated with a high-quality transport system are notably absent from this draft GPS.

We request the inclusion of the Greater Christchurch Public Transport Futures (PT Futures) programme (including the delivery of Mass Rapid Transit) as a committed project on page 12, reflecting its significance to both Greater Christchurch and Canterbury, as well as New Zealand. Implementing the PT Futures programme is the second highest ranked project in the draft 2024-34 Canterbury RLTP.

PT Futures is critical to supporting the growing population and economic contribution of Greater Christchurch and Canterbury, whilst supporting housing and business growth, intensification and reducing transport congestion. Achieving these outcomes are critical to enabling greater economic growth and productivity in Greater Christchurch – New Zealand's second largest urban area. PT Futures includes the delivery of Mass Rapid Transit (MRT) and the in Greater Christchurch.

3. Do you have any comments on the intention to improve public transport through completing Rapid Transit Corridors set out in the draft GPS 2024?

As noted above, continued investment in public transport infrastructure and will to transform people's experience of public transport in Greater Christchurch.

In addition to being identified on page 12 of the draft GPS, we request the inclusion of the PT Futures programme as a significant public transport project on page 13 of the draft GPS.

Canterbury is focused on the strong links between strategic urban growth and efficient and sustainable infrastructure. The recently completed Greater Christchurch Spatial Plan sets clear direction on where future growth and development of Greater Christchurch should be focused – around key centres and along public transport corridors. This plan was jointly developed by

³ www.transport.govt.nz/area-of-interest/strategy-and-direction/transport-outcomes-framework

local government, mana whenua and government agencies. It sets a shared vision for the future of the sub-region.

Through PT Futures we already have an agreed investment programme of public transport infrastructure and service improvements to existing networks in Greater Christchurch that together with our partners, we can get on and deliver now.

The PT Futures programme in its entirety would deliver the following benefits for Christchurch (to name just a few):

- A 38% patronage uplift across the entire public transport network;
- The bus versus car journey time gap reduced between 16% and 36%;
- A 56% increase in access via public transport to the City Centre and key activity centres (such as Riccarton and Papanui), within 30 minutes;
- 39% more residents within 400m of a bus stop; and
- A 13.3 million km per annum decrease in vehicle kilometres travelled, significantly reducing congestion.

The effective delivery of bus network improvements through PT Futures would then support the initiation of an MRT service that would offer a high frequency and capacity 'turn-up-and-go' service along Greater Christchurch's strategic growth corridors. This project will connect into other anchor projects for Canterbury such as the Te Pae Convention Centre, Parakiore Recreation and Sport Centre, and Te Kaha stadium - this transformational project will make public transport more attractive to more people.

The project has an agreed route and a positive benefit cost ratio, and the agreement of all partners to progress it to the Detailed Business Case stage. Investment and delivery of this city-shaping project would be no less transformational for Greater Christchurch than the completion of the Auckland Eastern Busway or acceleration of Wellington's bus corridors.

We have a narrowing window of opportunity to deliver the MRT component of PT Futures in Greater Christchurch at a cost that is net positive for government. This requires commitment of all partners to progress with some urgency.

4. Do you agree with the stronger focus on road maintenance outlined in the draft GPS 2024?

We strongly support the stronger focus on road maintenance in the draft GPS 2024. In the Canterbury draft RLTP 2024-34, 'Create a well-maintained network' (i.e. increased maintenance of our roading network) is identified as the top ten-year investment priority.

The state highway and local road networks are Canterbury's largest value social asset. They connect our communities and underpin wellbeing while simultaneously being critical to supporting our region's economic growth and productivity.

A proactive approach to the maintenance, operation and pothole prevention on our roading network has positive flow on outcomes, including ensuring safe and reliable access for all, increased resilience of the network, and supporting efficient freight movements.

5. Do you agree with the focus on value for money outlined in the draft GPS 2024?

We agree with value for money being a focus in the draft GPS and support the intention to amend the Land Transport Management Act to require GPSs adopt a ten-year investment programme. This amendment will support better alignment with councils' long-term plans (LTPs) and RLTPs and provide greater certainty about long-term investments. We note that available funding in this proposed GPS is very constrained across activity classes.

Greater alignment between local, regional, and national transport planning and funding processes will generate better value for money for the taxpayer and ratepayer and enable greater productivity. The alignment of the GPS, National Land Transport Programme, RLTPs and LTPs will support improved efficiency and value for money in the sector.

Whilst we acknowledge farebox recovery funding models have an important role to play in public transport there is concern about the proposed increased public transport fare box recovery and third-party revenue for Canterbury given regional differences such as geography, network maturity and population makeup.

Increased fare box recovery has the potential to significantly hinder the current increasing patronage numbers. Greater Christchurch patronage is tracking 6.4% above pre-Covid numbers and is forecasted to reach 7.5% by the end of the fiscal year. Timaru is 55% above pre-Covid numbers, year to date.

The key for Canterbury is to maintain the positive momentum we have seen recently, supported by service improvements to deliver transport network efficiencies and reduced journey times. A blanket approach to fare box recovery is not recommended, a trial period should occur first, there will be areas where there will be a higher-cost-per-traveller public service delivery that serves important social needs.

6. Do you agree with the comments in the draft GPS 2024 that NZTA should explore a variety of funding and financing options for all major transport projects to help address New Zealand's infrastructure deficit?

We support the directive that the New Zealand Transport Agency (NZTA) should explore a variety of funding and financing options for all major transport projects. It is important that these options are assessed with an equity and climate lens applied to them while ensuring that the desired economic outcomes are achieved.

We remain deeply concerned about the medium to long-term land transport funding situation in New Zealand. We strongly support the work underway to review and reform the land transport revenue system in New Zealand – this work should be progressed with urgency by the Ministry of Transport. We support greater consideration for how local government could be

empowered to develop local funding solutions as part of this work. Securing local funding share is a significant challenge for councils given the limited funding levers available.

7. Do you have any further comments regarding the outcomes expected to be achieved under the priority of economic growth and productivity? These include reduced journey times, less congestion, improved access to markets, more efficient supply chains, and unlocking access for housing development?

As highlighted above, for the most part, we agree with the outcomes expected to be achieved under economic growth and productivity outcome. In relation to urban development and transport networks unlocking greenfield development, we want to highlight the importance of the land aspirations for Māori, specifically of Ngāi Tahu in Canterbury.

Both the Greater Christchurch Partnership and Canterbury Mayoral Forum are developing a housing strategy which integrates efficient transport planning. The Greater Christchurch Spatial Plan provides for considered greenfield growth, with housing and infrastructure development enabled through targeted intensification in urban and town centres and along key public transport corridors.

As signalled earlier in the submission, planned PT Futures, public transport improvements, including a potential new 'turn up and go' MRT system, will support the urban form desired by this GPS 2024 and to meet communities' aspirations for a well-functioning and sustainable urban environment that is productive, safe, resilient, and healthy.

Canterbury has a considerable amount of road, rail and coastal shipping paths transporting freight locally and internationally, that contributes significantly to the New Zealand GDP. Investing in Canterbury's freight routes coupled with strategic urban development can enable further economic development, when implemented with other transport options like active modes or public transport, a wider range of outcomes can be successfully achieved.

The key to the outcomes expected under the economic growth and productivity priority is investment in public transport and efficient, long term spatial planning, we encourage this to be largely reflected in the outcomes and further consideration to be given to the benefits that compact urban form can achieve.

8. Do you agree with the proposed Activity Class descriptions and funding ranges?

We strongly disagree with the proposed funding ranges for the public transport services and infrastructure activity classes in this draft GPS. Given the critical role of public transport in reducing congestion, increasing travel choice and accessibility, and supporting growth and efficiency, within our urban areas, we ask that additional funding be directed towards public transport improvements in our urban areas during this GPS period.

Canterbury demonstrates the positive effects of investing in public transport alongside other modes of transport. Canterbury is experiencing strong public transport patronage growth – patronage in Greater Christchurch is 6.4% above pre-COVID levels and in Timaru it is 55% above pre-COVID levels. At the end of 2024, we forecast patronage will be at the highest point since the earthquakes in 2010/11, thus displaying a long-term return on investment from the funding that the fifth National Government put into public transport in Canterbury.

Public transport is essential to achieving many of the outcomes expected in this draft GPS, including boosting economic growth, productivity, and prosperity, supporting efficient travel, and achieving good value for money. These benefits of public transport are not reflected in the draft GPS.

Nearly all journeys via public transport also involve either a walk or cycle leg at one or both ends of the trip. The proposed funding changes of the walking and cycling activity class make it difficult to deliver infrastructure improvements that will support the continued uptake of walking and cycling across Greater Christchurch, which will also hinder greater uptake of public transport in the sub-region.

There have been significant cost escalations for public transport service delivery across New Zealand. This makes the proposed increased fare box recovery challenging in Canterbury with a different population base compared to other urban centres using public transport. A rapid shift in farebox recovery will not necessarily create a stable revenue stream and may not enable investment to uplift services and patronage.

We question this GPS's ability to build sector capability when the available funding for investment management is proposed to decrease from GPS 2021. This activity class supports building a more robust understanding of the benefits that our planned investment will deliver, which in turn supports more informed decision making, ensuring investment certainty, confidence and value for money. We welcome an opportunity to work with NZTA on simplifying and improving the Business Case process to streamline efficient decision making.

9. Do you agree with the ministerial expectations as outlined in the draft GPS 2024?

We support the introduction of a National Infrastructure Agency and the intention to develop a 30-year plan for transport infrastructure in New Zealand. The significant legislative reform which this draft GPS proposes is strongly supported, including the development of a more efficient business case process.

We are concerned about the lack of the direction for the Sustainable Public Transport Framework (SPTF) and any changes proposed. Work is progressing at speed and has been incorporated into Road Controlling Authorities Long-Term Plans and contract negotiations with operators. Canterbury officers are willing to support any legislative reform work that effect regional and local government.