

14 September 2023

Ministry of Transport
PO Box 3175
Wellington

By email: gps@transport.govt.nz

Tēnā koe

Canterbury Regional Transport Committee and Canterbury Mayoral Forum joint submission on the Draft 2024 Government Policy Statement on Land Transport

The Canterbury Regional Transport Committee (RTC) and the Canterbury Mayoral Forum (CMF) thank the Ministry of Transport for the opportunity to make a joint submission on the Draft 2024 Government Policy Statement on Land Transport (draft GPS).

This letter and the attached response to your questions make up our joint submission.

We appreciate that the draft GPS will direct Waka Kotahi in the development of the National Land Transport Programme. Overall, we are supportive of the direction of the draft GPS and support the proposed inclusion of two significant road projects, the Christchurch Northern Link (which includes the Woodend Bypass) and the second Ashburton Bridge, for the Canterbury region. These projects will deliver improved safety, access, resilience and economic benefits for the communities we serve, and we applaud their inclusion.

We note however, our general concern that the overall level of transport investment in Canterbury and the South Island is not commensurate with the contribution that Canterbury and the South Island make to the national economy, and the key role that our primary/agricultural sector plays in the economic wellbeing of the whole of New Zealand.

The Canterbury region represents approximately 12 percent of New Zealand by population but 13 percent of national GDP and over 16 percent of the national roading network by length. However, in the 2021-24 NLTP Canterbury only received approximately 5-8 percent of forecast NLTP

Mayors standing together for Canterbury.

Secretariat, E: secretariat@canterburymayors.org.nz W: www.canterburymayors.org.nz
C/- Environment Canterbury, PO Box 345, Christchurch 8140 T: 03 345 9323

expenditure. Our expectation is that a higher share of the revenue generated from our region is returned to be spent in Canterbury this NLTP period.

Even with the substantial additional crown funding for this GPS there is simply not enough to support all our transport outcomes. This makes the Future for Transport Revenue System review even more urgent, we would seek to actively partner with central government on this review, and that this should be completed in time for the 2027 GPS.

In this submission the RTC and CMF provide comment on the key issues for Canterbury in the draft GPS, and respond directly to the questions posed.

Canterbury Regional Transport Committee

The Canterbury RTC is comprised of one representative from each of the Road Controlling Authorities (RCAs) in the Canterbury Region plus two regional councillors and Waka Kotahi. The committee was established pursuant to s106 of the Land Transport Management Act 2003 (LTMA). The principal responsibilities of the RTC are to:

- develop a Regional Land Transport Plan (RLTP) for the Canterbury Region
- ensure coordination of transport activities across road controlling authorities, and
- represent and advocate for the transport interests of the Canterbury Region.

Canterbury Mayoral Forum

The CMF comprises the Mayors of the ten Canterbury territorial local authorities and the Chair of the Canterbury Regional Council (Environment Canterbury), supported by our Chief Executives.

All Canterbury councils actively participate in the Forum: Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki District Councils, the Christchurch City Council and the Canterbury Regional Council (Environment Canterbury). The purpose of the Forum is to promote collaboration across the region and increase the effectiveness of local government in meeting the needs of Canterbury's communities.

The CMF published the Mayoral Forum's Plan for Canterbury In April 2023¹, which sets out the CMF's three key priority issues in this local government term:

- Sustainable environmental management of our habitats (land, air, water and ecosystems), focusing on land use and freshwater management.
- Shared prosperity for all our communities – focussing on building our economic strengths and developing emerging sectors, growing, attracting and retaining a skilled workforce, improving the transport network and coordinating strategies for housing our communities.
- Climate change mitigation and adaptation – reducing our carbon footprint, working together on climate action planning, building community resilience and making our infrastructure as strong as it can be.

¹ The Plan for Canterbury is available here: [Plan for Canterbury 2023-2025 - Canterbury Mayoral Forum \(canterburymayors.org.nz\)](https://canterburymayors.org.nz)

Of particular relevance to this submission is the CMF action to seek to partner and collaborate with government to develop an integrated approach to transport funding in Canterbury in order to increase the level of funding available for Canterbury transport networks.

Our context

Canterbury is the largest region in New Zealand by land area, extending from north of the Clarence River to south of the Waitaki, and from the main divide of the Southern Alps to the South Pacific Ocean. We comprise some of the largest and fastest-growing urban areas in New Zealand. Greater Christchurch is New Zealand's second most populous urban area and the decentralisation of people and jobs away from Christchurch's central city post-earthquakes has had a substantial impact on our transport networks.

However, outside of these main urban areas, Canterbury is sparsely populated, and our rural communities often need to travel significant distances to access even basic services. This is particularly the case in our least populated districts; Kaikoura, Mackenzie and Waimate, which represent three of the four least populated districts in the country. There is effectively no transport choice in these areas other than private vehicle, which makes these parts of the region almost entirely dependent on improvements in our vehicle fleet to reduce transport sector emissions.

We also have the most extensive road network of any region in New Zealand (16,195 km), and the second-highest tourism spend by region, which brings with it particular challenges. The predominance of low-volume, high-value roads in Canterbury requires greater investment in ongoing maintenance and renewals to ensure our networks can continue to support regional and national social and economic outcomes. It also advances our need to consider new approaches to maintaining levels of service and access for our communities in a changing climate. Put simply, most of our existing roading infrastructure was built for the climate we had 30 to 50 years ago, not the climate we have now or can reasonably expect to have in the near-term future.

In the section on supporting rural and regional communities (page 34), it is noted that the government, through the National Adaptation Plan, expects to develop new funding and asset management tools that better support councils to manage land transport infrastructure in a changing climate. We wholeheartedly support this and seek to collaborate and partner with government in the development of these new funding and asset management tools once the necessary plans and strategies are in place.

Lastly, we applaud Ministry staff for the clarity and readability of this GPS document. Thank you to all those involved in preparing it, and for the opportunity to provide feedback.

While Waka Kotahi is represented on the RTC, this submission does not reflect the views of Waka Kotahi.

The CMF and RTC secretariats are available to further clarify or answer any questions the Ministry may have about this joint submission. If you have any questions please contact either Jesse Burgess, Senior Strategy Manager Environment Canterbury on 027 381 5102, jesse.burgess@ecan.govt.nz or Maree McNeilly, Principal Advisor to the Mayoral Forum on 027 381 8924 or secretariat@canterburymayors.org.nz.

Nāku, iti noa, nā



Peter Scott
Canterbury Regional Council Chair
Chair, Canterbury Regional Transport
Committee



Nigel Bowen
Mayor, Timaru District Council
Chair, Canterbury Mayoral Forum

Canterbury Regional Transport Committee and Canterbury Mayoral Forum feedback on the Draft 2024 GPS Land Transport by section

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

1. We support the strategic priorities as outlined.
2. We support the introduction of *maintaining and operating the system* as a new strategic priority in this GPS. Maintenance is the top investment priority for Canterbury, and this is reflected in both the 2021 and the draft 2024-34 Canterbury Regional Land Transport Plan (RLTP).
3. We also strongly support the introduction of resilience as a new investment priority in this GPS. Resilience is important to Canterbury and the South Island and greater recognition of our resilience challenges² is something we have long advocated for. The Mayoral Forum's Plan for Canterbury highlights the significant cost of improving the resilience of the flood protection schemes, to protect not only local assets, but also national state highway and rail assets as articulated in [Before the Deluge](#) prepared for Te Uru Kahika.

Do you have any comments on the Strategic Investment Programme?

4. We seek the inclusion of the Greater Christchurch Public Transport Futures (PT Futures) programme in the Strategic Transport Programme (SIP) for which Waka Kotahi is to have special consideration. This would include the delivery of Mass Rapid Transit (MRT) for Greater Christchurch. While this project does receive mention in the draft GPS alongside projects in Waikato and Tauranga, we don't believe this accurately reflects just how far progressed this project currently is. Nor its criticality to achieving a more compact urban form and reducing transport emissions in New Zealand's second most populous urban area.
5. The Greater Christchurch MRT 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. PT Futures plus MRT would be no less transformational for Greater Christchurch than the City Rail Link and North-West Rapid Transit projects are to Auckland. We have a narrowing window of opportunity to deliver the MRT component in Greater Christchurch at a cost that is net positive for government. This requires the commitment of all partners to progress it with some urgency.
6. We support and thank government for the inclusion of the Christchurch Northern Corridor Improvements (which includes the Woodend Bypass) and the Second Ashburton Urban Bridge projects in the SIP. These are both projects that are important to our communities and will support improved safety, access, resilience and economic growth in our region. We look forward to further engagement as these projects continue to progress.

² 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](#).

7. We support the proposed SH1 Christchurch to Ashburton corridor study in the SIP and request that funding for this study be included in Waka Kotahi's State Highway Improvement Programme. We note that the proposed objectives of this study have potential dependencies with any future intra-regional public transport, and so we request that the scope of this corridor study be broadened to cover the length of SH1 from Waipara to Timaru, so that these two pieces of work might be progressed concurrently, can appropriately inform each other, and inform regional spatial planning for the Canterbury region.

Do you agree with the funding increases associated with the GPS 2024?

8. We consider the overall funding increase proposed in GPS 2024 to be inadequate. Furthermore, a drop-off in forecast funding beyond the first three years of this GPS is evident, and we remain deeply concerned about the medium to long-term land transport funding situation in New Zealand.
9. The proposed \$3.1b of debt funding this GPS, on top of the \$2b debt funding committed in the 2021 GPS, carries future repayment obligations. The gap between NLTF revenue and funding needs is increasing. This NLTP period started with \$13.1b revenue and \$18.4b of existing commitments. Even with the substantial additional crown funding there is only \$2.4b of new contestable funding available nationally and this is simply not enough to support all our transport outcomes. We suggest that the Future of the Transport Revenue System review needs to be progressed and with some urgency to be in place in time for the 2027-30 NLTP period.
10. For the 2021-24 period, Canterbury received just 5-8% of forecast National Land Transport Programme expenditure, despite our region representing approximately 12% of NZ by population, and over 16% of the national roading network by length. We would like to see approximately double this share of national expenditure (10-16%) returned to be spent in Canterbury in the 2024-27 period.

Do you have any comments on how funding has been allocated across the various Activity Classes in GPS 2024?

11. We generally support the proposed funding ranges for public transport, walking and cycling. We support a larger increase in funding for the state highway maintenance activity class than local roads, given the high share of travel that occurs on state highways. However, we consider the level of funding proposed for both the state highway and local road maintenance activity classes to be insufficient.
12. The 18 percent proposed increase in the GPS funding range (lower) for the local road maintenance activity class is barely sufficient to cover cost escalations in our local road Maintenance Operations and Renewals (MOR) programmes. In terms of network condition, it is 'standing still' at best, and does not provide sufficient funding for us to effectively 'catch up' on deferred works. Furthermore, over the 2021-24 period there was a significant overspend of emergency works funding. If our local road and state highway networks continue to be further impacted by extreme weather events in the 2024-27 period then the proposed funding levels will prove insufficient and network condition will continue to decline.
13. We suggest that emergency works funding needs to be shown separate in the GPS from local road and state highway maintenance funding to help local road controlling authorities adjust their budget bids to the level of funding available. We note that the shift of safety improvement

funding into state highway and local road improvements will mean an overall reduction in improvement funding which will make speed management plans difficult to implement.

14. We support the proposed creation of the inter-regional public transport activity class. However, we would like to see GPS direction on this (and Waka Kotahi investment policy) that is nationally focused and supports evidence-based, value-for-money decision making. We are at the start of a process to consider potential inter and intra-regional public transport services in Canterbury and we would hope to be competing on an even footing with other New Zealand regions for any potential funding in this area.

Do you agree with the Ministerial expectations as outlined in GPS 2024?

15. We support the intent in the statement of Ministerial expectations to Waka Kotahi to 'build back better', exactly how that would translate into Waka Kotahi's emergency works funding policy is unclear. While we support 'building back better' in principle, we think the effect of this GPS directive on delivery responsiveness is likely to be underwhelming without the type of additional funding tools and asset management approaches signalled on page 34 – which we consider to be just as important for major urban areas as in regional and rural localities. In some instances, responding to the impacts of climate change may mean a reduction in existing levels of service or abandoning some assets.
16. We strongly support the direction to Waka Kotahi to have greater regard to public transport provision in how it plans for and manages state highways. Given the high share of travel that occurs on state highways and the Emissions Reduction Plan directive to reduce travel, we cannot solely rely on high growth urban councils to deliver sought reductions in travel. In our view, Waka Kotahi needs to look just as closely at its own asset base and regulatory role and lead by example. Our experience to date of state highway improvement projects in Canterbury is that they continue to have little emphasis on public transport prioritisation and travel demand management approaches.
17. We also question this GPS's ability to build sector capability when the available funding for investment management is proposed to decrease. 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. At a time when Te Waihanga and government are calling for a forward pipeline of planned investment, the transport system is decarbonising and the legislation that underpins how we manage land use is also changing we need to ensure the sector is well-resourced to provide investment certainty and confidence.

Do you have any other comments on GPS 2024?

18. We would like to see central government co-funding for flood protection and river maintenance works. As noted above, river maintenance and flood protection schemes protect nationally significant crown infrastructure that has benefits beyond the communities within flood protection areas. Without ongoing river maintenance our road networks are at increased risk of disruption, and this is particularly applicable to the Canterbury region, which is characterised by its braided rivers.
19. Many of our road and rail bridges in Canterbury are approaching the end of their design life and in need of renewal. While bridges such as the lower Ashley river bridge and Ashburton bridge are included in the SIP, many others are not, such as Upper Orari, Rakaia, Rangitata

and Hurunui River bridge on SH1, and single-lane bridges on other Canterbury state highways.

20. We note that given the limited funding levers available to local government, securing local funding share will be a major challenge this GPS, as will the capacity of the transport sector to meet the governments delivery expectations.