

2 April 2024

Ministry of Transport
PO Box 3175
Wellington 6011

Tēnā koe,

Canterbury Regional Transport Committee and Canterbury Mayoral Forum joint submission on the draft Government Policy Statement on land transport 2024

The Canterbury Regional Transport Committee and Canterbury Mayoral Forum thank the Ministry of Transport for the opportunity to make a submission on the draft Government Policy Statement on land transport 2024 (GPS). This letter and the attached response to your questions make up our joint submission.

Overall, we are supportive of the direction outlined by the Government in this draft GPS. We particularly support the increased focus on improving the maintenance and resilience of our state highways and local roads – the top investment priorities in the draft Canterbury Regional Land Transport Plan 2024-34. Canterbury has the most extensive road network of any region in New Zealand and the second highest tourism spend, which brings with it particular challenges. The predominance of low-volume and high-value roads in our region requires greater investment in ongoing maintenance and renewals to ensure our networks can continue to support regional and national economic and social outcomes.

Considerable investment in Canterbury's transport network is required to deliver on the outcomes sought by this GPS and to meet the expectations of our communities. This includes investment in our state highways, local roads, and public transport across the region.

While we support the focus on state highways and local roads in this draft GPS – including the identification of the Belfast to Pegasus Motorway and Woodend Bypass, and Second Ashburton Bridge – we are concerned by the lack of commitment or any reference to public transport in Canterbury. This is a significant omission of this draft GPS and not reflective of the pressing need to invest in public transport in our region, particularly in Greater Christchurch – the second largest and a fast-growing urban area in New Zealand. We trust this will be rectified in the final GPS.

Mayors standing together for Canterbury.

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More generally, we are concerned that the overall level of transport investment in Canterbury and the South Island will not be commensurate with the contribution we make to the national economy.

The Canterbury region represents approximately 12 percent of New Zealand's population, contributes 13 percent of national GDP and has over 16 percent of the national roading network by length. In the 2021-24 National Land Transport Programme (NLTP), Canterbury only received between 5-8 percent of the forecasted NLTP expenditure, which doesn't reflect the substantial contribution our region has and continues to make to the country.

In the draft Canterbury Regional Land Transport Plan 2024-34, we are proposing a \$10.8 billion investment in the region's land transport network over the next decade. This is almost double the funding set out in the 2021 plan. Our expectation is that a much higher share of the revenue generated from Canterbury will be spent in our region during this NLTP period.

Even with the additional Crown funding for this GPS, there is simply not enough to support all our transport needs and aspirations in Canterbury. This makes the Ministry of Transport's Future for Transport Revenue System review even more urgent. We would like to partner with Government on this review and encourage it to be completed in time for the 2027 GPS. We also continue to be open to exploring a range of funding options and financing models to deliver effective and efficient transport outcomes, including the opportunity for more funding levers for local government.

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

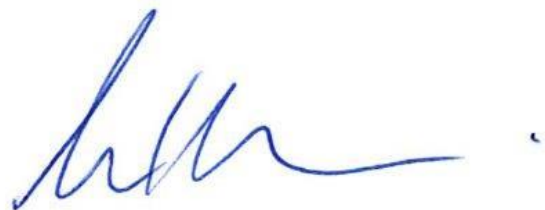
While NZTA is represented on the Canterbury Regional Transport Committee, this submission does not reflect the views of NZTA.

The Canterbury Regional Transport Committee and Canterbury Mayoral Forum secretariats are available to clarify or answer any questions that the Ministry may have about this joint submission. If you have any questions, please contact either Jesse Burgess, Senior Strategy Manager Canterbury Regional Council 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



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Chair, Canterbury Regional Transport Committee
Chair, Canterbury Regional Council



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Chair, Canterbury Mayoral Forum
Mayor, Timaru District Council

Canterbury Regional Transport Committee and Canterbury Mayoral Forum feedback on the draft Government Policy Statement on land transport 2024

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

1. We 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 to 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. We support the strategic priorities as outlined in the draft GPS subject to these omissions being addressed.
2. We strongly support the introduction of *Increased maintenance and resilience* as a new strategic priority in this draft GPS. Maintenance is the top investment priority for Canterbury, reflected in both the 2021-31 Canterbury Regional Land Transport Plan (RLTP) and draft 2024-34 Canterbury RLTP. The focus on improved safety and freight systems in the draft 2024-34 Canterbury RLTP also has good alignment with the direction of this draft GPS and will benefit from greater investment in the maintenance of our roading network.
3. Our region has a number of strategic routes that are highly vulnerable to disruption from natural hazards – greater recognition of our resilience challenges¹ is something we have long advocated for. We strongly support the emphasis placed on resilience as a strategic priority in this draft GPS. Increasing the resilience of our transport network is critical to Canterbury and the South Island. We look forward to working with this Government to begin addressing the significant resilience issues facing the people and places of Canterbury.
4. 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 Kahika. 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 couldn't get through to the lower South Island.

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

5. We expect the overarching priority of economic growth and productivity will be assessed in a balanced manner alongside other relevant outcomes. We support this priority with a balanced assessment applied.
6. The Ministry of Transport's *Transport Outcomes Framework* 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. A holistic view of transport

investment, such as outlined in the *Transport Outcomes Framework*, must be taken to ensure a range of outcomes are delivered that benefit our infrastructure, environment, and communities.

7. For the 2021-24 period, Canterbury received just 5-8% of the forecasted National Land Transport Programme (NLTP) expenditure. This is despite our region representing approximately 12% of New Zealand's population, contributing 12% of national GDP and having over 16% of the national roading network.² Canterbury continues to experience significant population, tourism, and economic growth, but has not seen an adequate level of funding through previous NLTP periods to effectively support the growth and productivity of our regional economy, and contribute to the long-term vision for our region.
8. In this context, we expect to see double the share of NLTP expenditure we received in the 2021-24 period returned to be spent in Canterbury in the 2024-27 period (10-16%).

Do you agree that the 15 Roads of National Significance, and the Roads of Regional Significance, will boost economic growth and productivity?

9. A second bridge in Ashburton will provide increased resilient connections for people and freight between Christchurch and Timaru, and beyond to the lower South Island. It is the top ranked project in the draft 2024-34 Canterbury RLTP. We strongly support the identification of the Second Ashburton Bridge in this draft GPS, recognising the resilience, access, freight efficiency and economic growth benefits associated with this major transport project. We request this critical project for both Canterbury and the South Island be included as a Road of National Significance in the final GPS, alongside the Belfast to Pegasus Motorway and Woodend Bypass project, rather than as a Road of Regional Significance.
10. We thank the Government for its commitment to delivering the Belfast to Pegasus Motorway and Woodend Bypass project with its inclusion as a Road of National Significance in this draft GPS. This major transport project is important to our communities and will support improved safety and access outcomes, and economic growth, in our region and beyond. We look forward to working with the Government as this project is progressed during this GPS period.
11. We request that the Canterbury Package identified in Appendix B of the draft GPS be expanded to include improved connections on SH1 between Timaru's port (PrimePort Timaru) and Christchurch. PrimePort Timaru is an important access point for the lower South Island in situations where state highway and/or rail links are disrupted, making it critical to national resiliency.
12. When the Alpine Fault earthquake occurs – research indicating there is a 75% probability of it occurring in the next 50 years, PrimePort Timaru will be a key enabler of the movement of essential supplies both north and south. It is the only port in the South Island able to receive oversized goods for electricity generation. Investment in the Port's southern entrance will greatly strengthen access to this strategic asset and ensure movement of freight and supplies to the South Island during future emergency events.

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

13. There is no mention in this draft GPS of public transport in Canterbury. This is a striking omission, especially given Greater Christchurch is the second largest and one of the fastest-growing urban areas in New Zealand. The lack of commitment to delivering improved public transport in Greater Christchurch in the draft GPS does not accurately reflect the importance of this urban area to Canterbury, the South Island and New Zealand, and the role that public transport needs to play to enable its ongoing growth and productivity.
14. Public transport in Canterbury comes in various forms. Greater Christchurch has a metro bus network, Timaru has an on-demand public transport service, and smaller districts have Total Mobility and Community Vehicle Trust schemes. Public transport is a key enabler of growth in Canterbury's urban areas, and there are strong expectations from our communities to see significantly enhanced public transport in these areas in the near future.
15. We therefore request the inclusion of the Greater Christchurch Public Transport Futures (PT Futures) programme as a major public transport project on page 13 of the draft GPS.
16. The PT Futures programme includes the delivery of planned improvements to the existing bus network in Greater Christchurch, and the planning and delivery of a Mass Rapid Transit (MRT) service that would offer a high capacity and frequency 'turn-up-and-go' service along the strategic growth corridors. This has been endorsed in the recently completed Greater Christchurch Spatial Plan. Delivering PT Futures is the second highest ranked project in the draft Canterbury RLTP 2024-34 and is critical to achieving a productive urban form, unlocking increased housing supply and choice, and reducing congestion in Greater Christchurch.
17. The work on MRT in Greater Christchurch has identified a preferred route and positive benefit cost ratio, and the agreement of all partners to progress it to the Detailed Business Case stage. PT Futures, including MRT, would be no less transformational for Greater Christchurch than the North-West Rapid Transit projects are to Auckland, or the Harbour Quay bus corridors are to Wellington. It requires the commitment of all partners to progress.
18. 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 urgency.

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

19. 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.
20. Many of our road and rail bridges in Canterbury are also approaching the end of their design life and are in need of renewal. This includes the three oldest bridges on New Zealand's state highway network, which are located between the Timaru and Selwyn districts. This package of bridge

renewal projects in Canterbury, and more widely across the South Island, represents a major programme of work to improve the resilience of our road and rail networks in New Zealand. This should be a priority for the Government.

21. As extreme weather events continue to effect Canterbury, there is a risk the proposed funding levels for maintenance will prove insufficient and network condition will continue to decline.
22. We ask that clearly defined activity classes and fulsome guidance is provided by NZTA for the maintenance activity classes once the NZTA Board finalises the NLTP spend. This will ensure our Road Controlling Authorities can efficiently plan and invest in their programmes of work and ensure that maintenance and renewal targets can be met.
23. The efficient use of electronic Road User Charges (RUC) for heavy vehicles is a great tool to charge and incentivise making the right decisions for use of different transport choices and ensure heavier vehicles are paying their fair share towards road maintenance. We encourage the Government to make better use of this technology to ensure heavy vehicle RUC are equivalent to the consumption of roads, not subsidised by taxes and local rates.

Do you have any comments on the Government's priority to create a Pothole Prevention Fund across two activity classes to ringfence maintenance funding to help address the record number of potholes on our roads?

24. We expect that robust definitions and guidance will be developed in relation to the Pothole Prevention Fund to empower Road Controlling Authorities in Canterbury to use the fund efficiently and effectively.
25. We support the approach of this draft GPS to ringfence funds for the purpose of addressing the rise in the number of potholes and prevent the further deterioration of our local road and state highway networks.

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?

26. We remain deeply concerned about the long-term land transport funding situation in New Zealand. We urge that the work being undertaken by the Ministry of Transport on the Future of the Transport Revenue System review be progressed as a priority and that there is consideration for how local government could be empowered to develop local funding solutions as part of this work. Securing local funding share is a big challenge for local government given the limited funding levers available.
27. We recognise that the funding available nationally does not adequately reflect the needs of our region, however are supportive of the directive for NZTA to explore a variety of funding options for delivering major transport projects in New Zealand.

Do you agree with the outcomes expected to be achieved through the draft GPS 2024?

28. We question the ability of this GPS to build sector capability when the available funding for the investment management activity class 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.
29. We welcome the opportunity for regional deals between central and local government as a way to work together to achieve shared goals for Canterbury and build on the strong collaborative working arrangements we have already established in Canterbury. This approach would help achieve the numerous outcomes sought by this GPS.
30. We continue to advocate for further consideration being given to freight moved by rail and coastal shipping, and how it can contribute to economic growth and productivity in Canterbury and the South Island. Integrated freight systems that connect to rail, air and sea have positive efficiency benefits.