

Christchurch City Council MINUTES ATTACHMENTS

Date: Thursday 23 April 2020
Time: 10am
Venue: Held by Audio/Video Link

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Purpose

1. The purpose of this report is to provide an update on Council's response to Covid 19, including:
 - 1.1. Council's transition to Alert Level 3.
 - 1.2. Council's capital programme under Alert Level 3.
2. The report also provides advice on governance arrangements under Alert Level 3.

Update on Council response to COVID-19

3. The health, well-being and safety of our community is our priority.
4. We are continuing to provide all essential services as well as providing many other services remotely. While the lockdown has impacted on our facility-based services we have sought to provide many of those services online.
5. As we move to Alert Level 3 we are seeking to implement strategies which will:
 - 5.1. Lessen the impact of economic hardship and disruption on our residents and local businesses – i.e. flatten the recession curve.
 - 5.2. Support the wellbeing of our communities.

Transition to Alert Level 3

6. **Attachment 1** provides a summary of our service provision under Alert Level 3.
7. Across Council we are focused on:
 - 7.1. Providing services that support local residents and local businesses and help the city to continue to function;
 - 7.2. Maintaining and accelerating the pipeline of work to support local business recovery and keep residents in jobs;
 - 7.3. Protecting public health and wellbeing.
8. We will continue to prioritise the delivery of essential services under Alert level 3.
9. We are ready to move quickly to:
 - 9.1. Resume our capital projects and have been working with our contractors over the last weeks to ensure they can get back to work;
 - 9.2. Resume a large proportion on our maintenance services;

Citizens & Community Group

Memo

Re: **Resumption of Governance Meetings**

Date: **22 April 2020**

To: **GM Citizen & Community**

From: **Head of CSG&P**

Purpose

This memo is to provide advice and a recommendation on the resumption of Governance Meetings under alert levels 3 and 2. Meetings include:

- Council
- Committee of the Whole
- Committee
- Hearings
- Community Board

This advice has been informed by recent NZ Government announcements, staff from the Community Support, Governance & Partnerships and Legal Services Units.

Methodology

Different operating scenarios for the relevant meetings were cross-referenced against the NZ Government guidelines issued on 16 April 2020 and the NZ Government announcement at 4.00pm 20 April.

Specific guidelines relevant to alert level 3 and 2 in relation to governance decision meetings is summarised below:

Level 3:

- High risk disease is not contained.
- Minimum 1 metre distancing in the workplace.
- Must work from home unless this is not possible.
- Businesses can not physically interact with customers.
- Stay at home unless essential to leave, leaving for work permitted.
- Indoor gatherings of up to 10 permitted.
- Workplaces must operate safely.

Level 2:

- Disease is contained but risk of community transmission remains.

- Indoor gatherings of up to 100 permitted.
- Businesses open, can physically interact with customers if appropriate measures are taken.

Council, Annual Plan Hearings, Hearings and Committee of the Whole

Under level 3:

Similar to alert level 4. Essential staff only in the chambers operating the Virtual meeting Room and audio/audio-visual links.

Where required meetings livestreamed or recorded.

Under level 2

Conducted in the Chambers with precautions ensuring a **safe workplace** enforced, namely:

- A high standard of hygiene will be maintained – frequent cleaning.
- Records will be kept of who is working together and where they have come from.
- Opportunities for physical interaction will be limited by:
 - Using multiple access points
 - Not serving refreshments
 - Installation of physical barriers if needed
 - Regular short adjournments
 - Lockdown of spaces where uncontrolled gatherings could occur
- Key personal present limited to Elected Members, Principal Advisor, Secretary, Support Officer and Technical Support Officer.
- Furniture and room layout modified to exceed 1 metre distancing.
- Any person with compromised health will virtually attend by audio or audio visual link.
- Any person not wishing to attend can elect to virtually attend by audio or audio visual link.
- The meetings will be either recorded, live streamed or both.
- There will be limited public access.
- Presenters will be encouraged attend by audio or audio visual link or provide written information.

Community Boards

Under level 3

Skype or ZOOM forums hosted by staff not subject to LGOIMA and not formally making decisions.

Board discussions on preparations for level 2 and the resumption of delegations, briefings by governance and board staff and the ongoing development of Board Plans and Board strategic initiatives is envisaged.

Under Level 2

Boards physically meet in Boardrooms with precautions ensuring a **safe workplace** enforced similar to that detailed above.

Delegated decision making and briefings by a wider range of staff and other stakeholders can resume.

Recommended Timeframe

This is subject to change due to changing alert levels, NZ Government guidelines on permitted activity within alert levels and organisational requirements.

Council	Meet twice monthly until 28 May then revert back to previous schedule; namely 11 June and 23 June (Annual Plan Adoption)
Hearings	As required from April 29
Annual Plan Hearings	Between May 7 and May26 (subject to confirmation)
Committee of Whole	Resume in June, namely: <ul style="list-style-type: none">○ Finance & Performance 4 June○ Urban Development and Transport, 10 June○ Audit and Risk 16 June○ Three Waters Infrastructure and Environment 24 June○ Sustainability and Community Resilience 25 June
Community Boards	23 April to 15 May Skype – Zoom forums hosted by Governance Staff 18 May to 29 May, Skype – Zoom forums, briefings and preparation for BAU 1 June - revert back to previous schedule
Committees	1 July revert back to previous schedule

CHRISTCHURCH CITY COUNCIL - TRANSITION TO ALERT LEVEL 3

Governance 1

3 Waters 2

Parks and Recreation 4

Libraries, Galleries and Museums 7

Community Development 8

Consenting and Compliance 9

Transport 12

Communications & IT 13

Capital Delivery 13

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
	<ul style="list-style-type: none">- People instructed to stay at home- Educational facilities closed Businesses closed except for essential services (e.g. supermarkets, pharmacies, clinics) and lifeline utilities- Rationing of supplies and requisitioning of facilities- Travel severely limited- Major reprioritisation of healthcare services	<ul style="list-style-type: none">- Travel in areas with clusters or community transmission limited- Affected educational facilities closed- Mass gatherings cancelled- Public venues closed (e.g. libraries, museums, cinemas, food courts, gyms, pools, amusement parks)- Alternative ways of working required and some non-essential businesses should close- Non face-to-face primary care consultations- Non acute (elective) services and procedures in hospitals deferred and healthcare staff reprioritised
Governance		
Governance updated 14/04/20	Council Secretariat and Governance Process <ul style="list-style-type: none">• Council meetings via VMR.• Representative review restarts. InfoCouncil operative	Council Secretariat and Governance Process <ul style="list-style-type: none">• InfoCouncil operative.• BigTinCan operative.• PX Document release operative.• Briefings continue remotely Council meetings <ul style="list-style-type: none">• Council meetings via VMR. Committee and Hearing Secretariat <ul style="list-style-type: none">• Hearings held as virtual meetings i.e. Annual Plan.• Chair’s meetings for future planning work. Not public.• Option for Committees for the Whole reinstatement as virtual meetings

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
		Community Board Functions (summary) <ul style="list-style-type: none">• Decisions made under delegated authority remotely using Skype for business, when delegations restored. Council decision needed.• Briefings, Board feedback and other functions undertaken using Skype for business remotely.
3 Waters		
Drinking water and wastewater services updated 16/04/20	<p>Continued provision of drinking and wastewater</p> <p>Operational Sites</p> <ul style="list-style-type: none">• Some staff working from home• Essential staff in controlled/locked down facilities (e.g. at treatment plants, network control)• Ensure continued service and protect staff by physical distancing initiatives such as site separation and split shifts.• Reactive repairs on network (where essential)• Procurement continuing remotely <p>Maintenance Activities</p> <ul style="list-style-type: none">• Staff working from home where possible• Workstream to ensure continuity of service; focus on keeping networks operational• Maintenance of critical equipment – pumps and valves• Reactive repairs and response• Water supply pump station cleaning <p>Capital programme</p> <ul style="list-style-type: none">• Continue and accelerate planning and procurement, initiate online tenders or direct panel appointments / partners• Reconsider procurement processes (undertake preparatory work for new projects and look how your private sector partners are engaged.	<p>Continued provision of drinking and wastewater</p> <p>Operational Sites</p> <ul style="list-style-type: none">• Some staff continue to work from home• Ensure continued service• Essential staff in controlled/locked down facilities (e.g. at treatment plants, network control)• Site separation continues with physical distancing of staff on sites• Protect staff & ensure continued service by physical distancing initiatives such as site separation and split shifts. <p>Maintenance Activities</p> <ul style="list-style-type: none">• Staff working from home where possible• Staff on site in small segregated teams within their own workplace bubbles• Planned maintenance and connections work on the retail network• Wastewater and stormwater pump station cleaning where required• Maintenance of valves and equipment• Reactive maintenance extended• Most routine maintenance of network infrastructure activated• No cosmetic work such as graffiti removal, landscaping etc around network facilities <p>Developer Services Reinstated</p> <ul style="list-style-type: none">• Compliance and inspections - subdivision connection works, subject to restoration of housing construction works• Connections of water and meters to address outstanding connection applications – subject to wastewater being connected and drainlayers etc. services also restored <p>Meter Reading</p> <ul style="list-style-type: none">• Reading cycles start again – may start with commercial customers only and leave residential for level 2 (under negotiation)

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
		Active Construction Sites <ul style="list-style-type: none">• <u>All</u> active construction sites reopen Capital programme <ul style="list-style-type: none">• Stand up planned capital programme dependent on:<ul style="list-style-type: none">- Supply chain (availability)- Contractor availability- H&S plan (ability to maintain distance and hygiene, tracking)- Limited “bubbles” on sites to limited risk and allow tracking.• Continue and accelerate planning and procurement, initiate online tenders or direct panel appointments / partners• Procurement continuing remotely
Flood and drought management, flood protection and land drainage updated 16/04/20	Flood and drought management, flood protection and land drainage <ul style="list-style-type: none">• Staff working from home• Planned maintenance limited to flood risk minimisation related activities with good physical distancing and Covid19 risk management practices	<ul style="list-style-type: none">• Staff working from home where possible, if not they will work within their workplace bubbles.• Planned maintenance BAU within public spaces with good physical distancing and Covid19 risk management practices• Reactive maintenance limited to work where good physical distancing can be achieved, customer/public interaction to be avoided
Solid waste updated 16/04/20	<ul style="list-style-type: none">• Solid waste collection continues – maintain waste, recycling and organics (red, yellow and green bins)• Materials Recovery Facility (MRF) shut down – recyclables to landfill• Organics Processing Plant – open and limited to processing green bins only	<ul style="list-style-type: none">• Solid waste collection continues – 3 bins as usual• Consider opening of MRF – dependent on contamination levels in incoming material <10%• Consider expanding OPP to commercial customers
Landfill operation updated 16/04/20	<ul style="list-style-type: none">• Essential rubbish collection and disposal functions• Kate Valley continues to operate Transfer stations <ul style="list-style-type: none">• Transfer stations closed to public• Open to commercial customers and by appointment if urgent public health driver	<ul style="list-style-type: none">• Essential rubbish collection and disposal functions• Kate Valley continues to operate• Burwood open to clean fill Transfer stations <ul style="list-style-type: none">• Transfer stations open to all commercial users• Limited operation for general public – rubbish and green waste only ECO centres <ul style="list-style-type: none">• No collection household goods• Eco Shop closed
Contact Centre & Service Centre services updated 16/4/20	Contact Centre (phone, email, online) <ul style="list-style-type: none">• Continue 24/7 remotely	Contact Centre (phone, email, online) <ul style="list-style-type: none">• Continue 24/7 service remotely

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
	Service Centre services (face to face) <ul style="list-style-type: none">Closed	Service Centre services (face to face) <ul style="list-style-type: none">ClosedReview options for controlled access (limited sites)
Parks and Recreation		
Cemeteries and crematoria updated 16/04/20	Essential service <ul style="list-style-type: none">Cemeteries will remain open messaging re appropriate social distancingRestrictions on operation of cemeteries; Covid19 risk management practices .Only family bubble can attend funerals.Plans and preparation for additional capacity if required	Essential service <ul style="list-style-type: none">Cemeteries will remain open messaging re appropriate social distancingReduced restrictions on operation of cemeteriesGatherings of up to 10 people allowed at funerals tangihanga, if they can operate safely, and:<ul style="list-style-type: none">Physical distancing and infection prevention and control requirements must be metMust record attendees to ensure contact tracing can be conducted if necessaryNo participants allowed who have COVID-19 symptoms or who need to be in isolation/quarantine for any reason Operations and maintenance <ul style="list-style-type: none">Recommence basic levels of service limited to activity that can be managed with single operators dependent on:<ul style="list-style-type: none">Staff (availability)H&S plan (ability to maintain distance and hygiene, tracking)Limited “bubbles” on sites to limited risk and allow tracking Capital programme <ul style="list-style-type: none">Stand up planned capital programme for cemetery beam installation dependent on:<ul style="list-style-type: none">Supply chain (availability)Contractor availabilityH&S plan (ability to maintain distance and hygiene, tracking)Limited “bubbles” on sites to limited risk and allow tracking.
Public toilets updated 16/04/20	<ul style="list-style-type: none">Toilets only on main freight routes open (and where requested by essential services)Increased cleaning frequencyProcurement and planning continuing remotely	<ul style="list-style-type: none">Toilets only on main freight routes open. (and where requested by essential services)Increased cleaning frequency
Parks and Playgrounds updated 16/04/20	<ul style="list-style-type: none">Parks open. With Messaging re social distancingcarparks within parks closed for vehicle access, pedestrian access openPlaygrounds & exercise equipment closedPublic toilets closed.	<ul style="list-style-type: none">Parks open. With Messaging re social distancingBotanic gardens opens monitoring of numbers may be required , buildings remain closedCarparks closed

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
	<ul style="list-style-type: none">• Dog waste must be taken home and dispose of it in bin for normal kerbside collection• Facilities within parks closed including the visitor/information centres• Skeleton crew of essential workers checking parks daily, vermin control, fly dumping, fire hazard, bin emptying• Wharfs and jetties closed	<ul style="list-style-type: none">• Playgrounds and exercise equipment closed• Public toilets closed.• Dog waste must be taken home and dispose of it in bin for normal kerbside collection• Wedding Services – up to 10 people subject to:<ul style="list-style-type: none">- Additional conditions on gatherings:- Physical distancing and infection prevention and control requirements must be met. •- All gatherings must record attendees to ensure contact tracing can be conducted if necessary.- No participants allowed who have COVID-19 symptoms or who need to be in isolation/quarantine for any reason.• All Council-owned sports facilities e.g clubrooms are closed.• Full urban and regional park ranger service operating – with Covid H&S in place <p>Scheduled maintenance</p> <ul style="list-style-type: none">• Recommence basic levels of service limited to activity that can be managed with single operators dependent on:<ul style="list-style-type: none">- Staff(availability)- H&S plan (ability to maintain distance and hygiene, tracking)- Limited “bubbles” on sites to limited risk and allow tracking <p>Capital programme</p> <ul style="list-style-type: none">• Stand up planned capital programme dependent on:<ul style="list-style-type: none">- Supply chain (availability)- Contractor availability- H&S plan (ability to maintain distance and hygiene, tracking)- Limited “bubbles” on sites to limited risk and allow tracking.• Continue and accelerate planning and procurement, initiate online tenders or direct panel appointments / partners
Sports Fields, Tracks, Water-based recreation updated 16/04/20	<p>Sports Fields</p> <ul style="list-style-type: none">• Closed <p>Sports facilities on fields</p> <ul style="list-style-type: none">• All Council-owned sports facilities e.g clubrooms are closed. <p>Boat Ramps</p> <ul style="list-style-type: none">• Closed <p>Critical maintenance</p>	<p>Sports Fields</p> <ul style="list-style-type: none">• Closed <p>Sports facilities on fields</p> <ul style="list-style-type: none">• All Council-owned sports facilities e.g clubrooms are closed. <p>Boat Ramps</p> <ul style="list-style-type: none">• Closed <p>Scheduled maintenance</p>

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
	<ul style="list-style-type: none"> Updated guidelines from MBIE implemented for Urgent maintenance of biological assets must be undertaken in a manner that: <ul style="list-style-type: none"> minimises, or eliminates if possible, physical interactions among staff ensures appropriate health, hygiene and safety measures are in place restricts activity to only what is essential during the Alert Level 4 period. 	<ul style="list-style-type: none"> Recommence basic levels of service limited to activity that can be managed with single operators dependent on: <ul style="list-style-type: none"> Staff(availability) H&S plan (ability to maintain distance and hygiene, tracking) Limited “bubbles” on sites to limited risk and allow tracking. <p>Capital programme</p> <ul style="list-style-type: none"> Stand up planned capital programme dependent on: <ul style="list-style-type: none"> Supply chain (availability) Contractor availability H&S plan (ability to maintain distance and hygiene, tracking) Limited “bubbles” on sites to limited risk and allow tracking. Continue and accelerate planning and procurement, initiate online tenders or direct panel appointments / partners
Camping Grounds and Holiday Parks updated 15/04/20	<ul style="list-style-type: none"> Public camp sites closed. Some holiday parks limited bookings for self-contained vehicles only. Some emergency provision for freedom campers – separate facilities. No communal facilities open e.g showers, toilets, kitchen or laundry etc. Temporary accommodation for self-isolation. 	<ul style="list-style-type: none"> Public camp sites closed. Some holiday parks limited bookings for self-contained vehicles only. Some emergency provision for freedom campers – separate facilities. No communal facilities open e.g showers, toilets, kitchen or laundry etc. Temporary accommodation for self-isolation. <p>Scheduled maintenance and capital programme</p> <ul style="list-style-type: none"> Stand up planned capital programme dependent on: <ul style="list-style-type: none"> Supply chain (availability) Contractor availability H&S plan (ability to maintain distance and hygiene, tracking) Limited “bubbles” on sites to limited risk and allow contact tracing.
Pools updated 15/04/20	Closed	<p>Closed</p> <p>Scheduled maintenance and capital programme</p> <ul style="list-style-type: none"> Stand up planned capital programme dependent on: <ul style="list-style-type: none"> Supply chain (availability) Contractor availability H&S plan (ability to maintain distance and hygiene, tracking) Limited “bubbles” on sites to limited risk and allow contact tracing.
Rec Centres, Gyms, Stadia updated 15/04/20	<p>Closed</p> <ul style="list-style-type: none"> Online services available e.g. workouts, stretch classes etc. Construction sites closed Capital programme planning, design and procurement and tendering continuing remotely 	<p>Closed</p> <ul style="list-style-type: none"> Online service available, workouts, stretch classes etc. <p>Scheduled maintenance and capital programme</p> <ul style="list-style-type: none"> Stand up planned capital programme dependent on:

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
		<ul style="list-style-type: none">- Supply chain (availability)- Contractor availability- H&S plan (ability to maintain distance and hygiene, tracking)- Limited “bubbles” on sites to limited risk and allow contact tracing.
Events updated 13/04/20	<ul style="list-style-type: none">• Cancelled	<ul style="list-style-type: none">• Cancelled• No gatherings greater than 10 people
Libraries, Galleries and Museums		
Libraries updated 16/04/20	<ul style="list-style-type: none">• Closed• Mobile and outreach services closed.• All public programmes and venue bookings cancelled.• All return bins closed. <p>Online services</p> <ul style="list-style-type: none">• Digital content available 24/7• Free wifi available outside libraries• Online library membership, enabling access to online services.• Finger-tip Library (phone, email & live chat)) operating 7 days, reduced hours• Book Chat advisory service• Book a Librarian reference service• Selected online programmes and activities available via the Library website <p>Loans</p> <ul style="list-style-type: none">• Loan period extended and holds suspended.	<ul style="list-style-type: none">• Closed to public• Limited access to staff to enable priority work that cannot be done at home, such as digitisation projects, if adequate measures in place re physical distancing and contact tracing• Mobile and outreach services closed.• All public programmes and venue bookings cancelled.• All return bins closed. <p>Online services</p> <ul style="list-style-type: none">• Digital content available 24/7• Free wifi available outside libraries• Online library membership, enabling access to online services.• Finger-tip Library (phone, email & live chat)) operating 7 days, reduced hours• Book Chat advisory service• Book a Librarian reference service• Selected online programmes and activities available via the Library website <p>Loans</p> <ul style="list-style-type: none">• Loan period extended and holds suspended.
Art Gallery updated 16/04/20	<p>Closed</p> <ul style="list-style-type: none">• Online resources enhanced, increased, communicated.• On site security 24/7	<p>Closed</p> <ul style="list-style-type: none">• Limited access to staff to enable priority work that cannot be done at home, if adequate measures in place re physical distancing and contact tracing online service, for example<ul style="list-style-type: none">- Staggered breaks- Alternative office/desk arrangements- physical distance as per government guidelines for level 3 observed at all times and monitored remotely.- Specific Alert Level 3 health and safety plan prepared and circulated to all working staff.- Sign in/out process put in place• Online resources enhanced, increased, communicated.• On site security 24/7

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
		<ul style="list-style-type: none">Some staff working from home on usual work or alternative gallery duties.
Akaroa Museum updated 15/04/20	<p>Closed</p> <ul style="list-style-type: none">Security monitored 24/7Director working in isolation onsiteCollections Manager working remotely from homeFrontline staff unable to work from home	<p>Closed</p> <ul style="list-style-type: none">Security monitored 24/7Director working in isolation onsiteCollections Manager working remotely from homeFrontline staff unable to work from home
Community Development		
Community Support updated 14/04/20	<p>Community Development</p> <ul style="list-style-type: none">Staff working remotely and deployed to functions at EOC <p>Community Facilities</p> <ul style="list-style-type: none">closed	<p>Community Facilities and Halls</p> <ul style="list-style-type: none">Essential maintenance (safety-sanitary-security) and compliance work only.Council run facilities, closed.Leased facilities closed unless exceptional circumstances.Stakeholder meetings held remotely.Planning and budgeting processes continue.Capital works in progress resume. <p>Community Development and support, city wide and ward specific (Alcohol harm, Multicultural, Youth, Older adults, Accessibility, Homeless and City Safety).</p> <ul style="list-style-type: none">Continue working remotely.Re prioritise in terms of impact on social and economic recovery.Continue planning and cooperation with NGO's and stakeholder orgs.Deployed to EOC Welfare Function <p>Community Recreation/Events</p> <ul style="list-style-type: none">Events remain cancelled <p>Community (grants) Funding</p> <ul style="list-style-type: none">Close SCF applications.New grant funding allocations suspended.Establish a cross-unit working group to advise GM in use of funding for recovery and savingsProcess essential or emergency applications (mayors welfare), remotely. <p>Strengthening Community and Social Recovery planning.</p>

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
		<ul style="list-style-type: none">• Project team continue to plan and map strategy development.• Seek direction from GM on the relationship with Social recovery planning post COVID.• Preliminary discussions with partners <p>Graffiti removal</p> <ul style="list-style-type: none">• Removal of offensive or highly prominent graffiti• Contact with volunteers to prepare for alert level two
Civil Defence and Emergency Management updated 14/04/20	<ul style="list-style-type: none">• EOC operations/services (remote where possible)• Welfare services, provision of food and essential items• Operating 0800 lines (remotely where possible)• Accommodation provisions• Animal welfare• Support repatriation flights, including management abandoned vehicles, rubbish	<ul style="list-style-type: none">• Welfare services, provision of food and essential items for at risk groups who are still isolated /lockdown• Operating 0800 lines (remotely)• Staff roster on in EOC
Consenting and Compliance		
Inspections updated 14/04/20	<ul style="list-style-type: none">• Inspections for solid fuel heater applications will be done virtually where possible.• Virtual inspections of approved building projects where possible• Inspections related to essential services and critical infrastructure, e.g. acute services building at the hospital, CBACs• PPE / COVID-19 H&S will be adhered to if a physical inspection for an essential services building is required / + access to Civic.	<ul style="list-style-type: none">• Inspections for solid fuel heater applications will be done virtually where possible.• Virtual inspections will be carried out where possible• Inspections can continue with PPE and physical distancing measures (already in place prior to alert 4 and industry were notified).
Building Consenting - Vetting & Allocation, - Processing, - Inspection Scheduling, - Specialist Engineering, - Code Compliance Administration, - Building Warrant of Fitness, - Earthquake Prone Buildings updated 14/04/20	<ul style="list-style-type: none">• All office based building Consenting services continue• Office based staff work from home	<ul style="list-style-type: none">• All desk based building consenting services continue• Office based staff work from home.• If possible, the small number of staff work in the office who are not able to work from home (e.g. no laptop, limited internet etc.) and those who are suffering H&S issues due to unsatisfactory working at home setups• Some site inspections following COVID 19 H & S practices

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
Resource Consents updated 14/04/20	Planners & Sub-division Engineers <ul style="list-style-type: none">- Site visits and Subdivision engineering site inspections• Avoid as non-essential. Office teams <ul style="list-style-type: none">- Processing resource consent applications; <i>Processing subdivision applications; Development Contribution assessments; Support functions; Hearings; Meetings</i>• Working from home• Can continue working as normal processing applications.• Can continue working as normal carrying out development contribution assessments.• Can continue working as normal providing support functions.• Can't publicly notify applications as requires printing and mail delivery. Notifications being delayed until after Level 4 lifted.• Can only hold hearings where parties agree can be done on papers, otherwise hearings need to be postponed until are Level 4 lifted.	Planners & Sub-division Engineers <ul style="list-style-type: none">• Site visits and Subdivision engineering site inspections)• Avoid unless essential and low risk.• Team leader prior approval required.• Site visit COVID-19 H&S protocols applied. Office teams <ul style="list-style-type: none">• Working from home except for required staff in the office.• Office COVID-19 H&S protocols in place.• Can continue working as normal processing applications.• Can continue working as normal carrying out development contribution assessments.• Can continue working as normal providing support functions.• Can publicly notify applications. Can only hold hearings where parties agree can be done on papers or virtually using video technology, otherwise hearings need to be postponed until are Level 4 lifted. Seeking further guidance from Ministry for the Environment on hearings should restrictions remain in force for a longer period
Strategic Partnership <ul style="list-style-type: none">- Quality Assurance- Case Management updated 14/04/20	<ul style="list-style-type: none">• All staff working remotely	<ul style="list-style-type: none">• All staff working remotely• Case Managers continuation of Client support with all staff working remotely
Business Solutions (consenting) updated 14/04/20	Front Counter – Regulatory Services <ul style="list-style-type: none">• Counter services closed Exemption & Advice (COA Inspections) <ul style="list-style-type: none">• All staff working remotely and continuation of services (no COA inspections) LIM/PIM's, Business Improvement, Exemption & Advice, Building Specialists <ul style="list-style-type: none">• All staff working remotely and continuation of services (excluding COA inspections)• LIM/PIM processing• Business Improvement Support (reporting/BA/training)• Duty BCO phone/email• Virtual Pre-application meetings• BAE/COA processing• Claims management	Front Counter – Regulatory Services <ul style="list-style-type: none">• Controlled access (limited sites)• COVID-19 H&S practises in place and recording for contact tracing Exemption & Advice (COA Inspections) <ul style="list-style-type: none">• All staff working remotely and continuation of services (No COA inspections) LIM/PIM's, Business Improvement, Exemption & Advice, Building Specialists <ul style="list-style-type: none">• All staff working remotely and continuation of services (excluding COA inspections)• LIM/PIM processing• Business Improvement Support (reporting/BA/training)• Duty BCO phone/email• Virtual Pre-application meetings• BAE/COA processing• Claims management

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
Regulatory Compliance updated 14/04/20	Food Safety and Health Licensing <ul style="list-style-type: none">All staff working remotely Alcohol Licensing <ul style="list-style-type: none">All working remotely Leadership Team <ul style="list-style-type: none">All working remotely Counter services <ul style="list-style-type: none">Closed Compliance Support <ul style="list-style-type: none">All working remotely	Food Safety and Health Licensing <ul style="list-style-type: none">All staff working remotelyLimited inspections with COVID-19 H&S practises applied Alcohol Licensing <ul style="list-style-type: none">Technical Officers - for monthly bulk invoicing managing post, scanning, cheque payments on applications, and issuing of licences and printing/posting documents for ARLA and parties (legislative). Leadership Team <ul style="list-style-type: none">All working remotely Counter services <ul style="list-style-type: none">Controlled access (limited sites)COVID-19 H&S practises in place and recording for contact tracing Compliance Support <ul style="list-style-type: none">All working remotely
Animal Control <ul style="list-style-type: none">caring for impounded dogsinvestigating dog attacks and seizures for policewelfare of animals recovering updated 14/04/20	<ul style="list-style-type: none">Good physical distancing and COVID-19 risk management practicesAnimal shelter closed to public, unless by appointment to claim known impounded dogs.Staff caring for animals currently housed. Good physical distancing and COVID-19 risk management practicesSome Animal Management Officers responding to priority 1 complaints. Good physical distancing and COVID-19 risk management practices.Priority 2 complaints will be responded to via phone for resolution.	<ul style="list-style-type: none">Flexible working practices – working remotely. Only responding (remotely) to urgent requests for service, e.g. dog attacks, wandering stock.Animal shelter closed to public, unless by appointment to claim known impounded dogs.Staff caring for animals currently housed. Good physical distancing and COVID-19 risk management practicesAnimal Management Officers responding to priority 1 complaints. Good physical distancing and COVID-19 risk management practices.Priority 2 complaints will continue to be responded to as per Level 4.Microchipping service will continue to be on hold.
Noise Control	<ul style="list-style-type: none">Essential service – reduced level of service.Receive noise complaints and triage.Contact occupiers remotely if possible.If triaged for intervention, either security officers or police can act on the request of the Noise Control Officer i.e. RMA s327(1)	<ul style="list-style-type: none">Essential service – reduced level of service.Council will continue to deliver noise control services.Calls will be triaged and resolved where possible remotely.All visits to properties will be conducted by Councils contracted security guard officers.The contractor has a Health and Safety Plan which addresses – physical distancing, one officer per vehicle and appropriate PPE.NZ Police will be called if there is a breach of a lockdown condition (large gathering), threat of violence or support seizure of equipment.

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
Transport		
Roading/highways updated 17/04	Essential service <ul style="list-style-type: none">• roading maintenance and repairs to keep the roads safe• Procurement continuing remotely	Essential services <ul style="list-style-type: none">• Works that can be performed with exemplary physical distancing between staff and away from the public, deploying Covid19 risk management practices. e.g. Road maintenance, full safety inspections and surveillance.• Defer high risk, non-essential projects, that can't be readily completed if status changes quickly, i.e only work able to be started & completed in the same day.• Staff to continue to work remotely if possible and undertake social distancing as much as possible. Capital programme <p>Stand up planned capital programme dependent on:</p> <ul style="list-style-type: none">• Supply chain (availability)• Contractor availability• H&S plan (ability to maintain distance and hygiene, tracking)• Limited “bubbles” on sites to limited risk and allow tracking.• Consider impact of construction works on community and potentially undertake in areas where the current lower public use of the road corridor can help enable suitable social distancing e.g. central city, rural areas.• Consider health and safety requirements for work on or near the footpath and the road shoulder/kerb. Maintenance <p>Priority maintenance (safety and/or rapid asset deterioration) with COVID H&S practices applied.</p> Operations <p>Road amenity and asset protection & Traffic operations</p> <ul style="list-style-type: none">• Staff working from home except when needed for priority and safety related issues.• Graffiti removal to be started due to lower risk of activity• Urgent or safety related improvements to be implement if works are simple and quick to undertake within Limited “bubbles” on sites Travel Demand Management (TDM) <ul style="list-style-type: none">• No physical work place & school TDM taking place.• Working on the development of on line training packages.
Public Transport	For essential workers only	For essential workers only
Parking Services	All staff working remotely	Flexible working practices – working from home. Only responding (remotely) to requests for service.

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
	<ul style="list-style-type: none"> • Carpark building open and free • On street parking free • Parking compliance team only reacting to blocked vehicle entrances and serious road hazards/safety issues 	<ul style="list-style-type: none"> • Carpark building open and free • On street parking free • Parking compliance team only reacting to blocked vehicle entrances and serious road hazards/safety issues
Communications & IT		
Communications updated 15/4/20	<ul style="list-style-type: none"> • Fully operating from home 	<ul style="list-style-type: none"> • All staff working remotely • Continued support for EOC and IMT • Continued support for Business as Usual.
Information Technology	<ul style="list-style-type: none"> • All staff working remotely • Once a week access to Civic to build approved laptops, by small number of staff. <p>Capital programme</p> <ul style="list-style-type: none"> • Planned capital programme dependent on: <ul style="list-style-type: none"> - Supply chain (availability) - Contractor availability • H&S plan (ability to maintain distance and hygiene, tracking) 	<ul style="list-style-type: none"> • Flexible working practices – some working from home, others attending offices as face to face if required (i.e Technical Infrastructure team to install staff equipment back onto desks). <ul style="list-style-type: none"> - Minimise physical contact of those in the office through careful rostering/schedules. - Stay home if unwell or vulnerable and hygiene messaging • Coordinate communication and work with suppliers following the Government Directive to move to Level 3 re <ul style="list-style-type: none"> - parameters are around Level 3 - if they are able to deliver services to Council, how and when. - clear direction regarding what would trigger us to move back to Level 4, the likelihood of that occurring and how we will communicate that information to them. <p>Capital programme</p> <ul style="list-style-type: none"> • Planned capital programme dependent on: <ul style="list-style-type: none"> - Supply chain (availability) - Contractor availability • H&S plan (ability to maintain distance and hygiene, tracking)
Capital Delivery		
Capital Delivery – Community updated 14/4/20	<ul style="list-style-type: none"> • Capital programme planning, design and procurement continuing remotely 	<p>Active Construction Sites</p> <ul style="list-style-type: none"> • <u>All</u> active construction sites reopen <p>Capital programme</p> <ul style="list-style-type: none"> • Stand up planned capital programme dependent on:

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
		<ul style="list-style-type: none">- Supply chain (availability)- Contractor availability- H&S plan (ability to maintain distance and hygiene, tracking) <ul style="list-style-type: none">• Limited “bubbles” on sites to limited risk and allow tracking.• Flexible working practices – Capital programme planning, design and procurement and tendering continuing remotely, or in office if corporate approach allows
Capital Delivery Major Facilities updated 16/4/2020	<p>All team members are currently active and working remotely across the Major Facility Portfolio.</p> <p><i>Canterbury Multi Use Arena</i></p> <ul style="list-style-type: none">• Enabling Works planning/procurement and design underway, all occurring remotely. <p><i>Hornby Centre</i></p> <ul style="list-style-type: none">• Can continue with Concept Design, Principals requirements, and approvals. Community engagement will be more difficult but possible. No issue until Tender Oct/Nov 2020, remote working. <p><i>Horncastle Arena</i></p> <ul style="list-style-type: none">• Delivery Team appointed, design/planning and readiness for manufacturing in place, off site manufacture held up due to Covid-19.Remote working. <p><i>Linwood Pool</i></p> <ul style="list-style-type: none">• Design and Build awarded, Apollo are remote working and full design is underway. <p><i>Performing Arts Precinct</i></p> <p>Concept Design, Principals requirements, and approvals. Procurement can conclude and appointment of design team. Detailed Site Investigation and Survey work on hold, project continues with remote communication.</p> <p><i>The Square</i></p> <p>Design works and preparation of documents for RFT, provide cost overview and budget review. Issue with TSD technologies required for design, survey work on hold all resources working remotely.</p> <p><i>Christchurch Town Hall</i></p>	<p>Team members are available for site visitation with appropriate MoH precautions taken, continue remote working.</p> <p><i>Canterbury Multi Use Arena</i></p> <ul style="list-style-type: none">• Enabling Works planning/procurement and design underway, all occurring remotely.• Commencement of Detailed Site Investigation and relocation of existing onsite service (Vodafone, Enable, and 3 Waters) could get underway following revised Level 3 protocols and acceptance of SSSP. <p><i>Hornby Centre</i></p> <ul style="list-style-type: none">• Can continue with Concept Design, Principals requirements, and approvals. Community engagement will be more difficult but possible. No issue until Tender Oct/Nov 2020, remote working. <p><i>Horncastle Arena</i></p> <ul style="list-style-type: none">• Delivery Team appointed, design/planning and readiness for manufacturing in place, offsite manufacturing can commence after approval of contractor’s H&S plan. <p><i>Linwood Pool</i></p> <ul style="list-style-type: none">• Design and Build awarded, Apollo are remote working and full design is underway. Site work is due to commence June 2020 with design undertaken concurrently, work will be able to commence under Level 3/2 with MoH protocols in place and SSSP approved. <p><i>Performing Arts Precinct</i></p> <ul style="list-style-type: none">• Concept Design, Principals requirements, and approvals. Procurement can conclude and appointment of design team. Detailed Site Investigation and Survey work to commence under Level 3/2 with MoH protocols in place and SSSP approved. Project continues with remote communication. <p><i>The Square</i></p> <ul style="list-style-type: none">• Design works and preparation of documents for RFT, provide cost overview and budget review. All design, survey work can commence. Alternate ways of work following MoH protocols. Work can commence under Level 3 MoH protocols and accepted SSSP. <p><i>Christchurch Town Hall</i></p>

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
	<ul style="list-style-type: none">Service commissioning on hold, all other close out and as-build information collated remotely. <p><i>Parks Master Programme Hagley Parks and Botanic Gardens</i></p> <ul style="list-style-type: none">Design briefs, planning and procurement continue remotely.Desktop topographical Surveys and Resource consent’s and research continuing so projects are progressing. <p><i>Metro Sports Facility</i></p> <ul style="list-style-type: none">Project under construction and closed until Levels are lifted, exemption granted under the environmental clause allowing for groundwater pumps to be regularly maintained, all other design work continues remotely.Project in delay. <p><i>Heritage Old Municipal Chambers</i></p> <ul style="list-style-type: none">Procurement, design, planning and specification continue remotely.	<ul style="list-style-type: none">Service commissioning can continue alongside defect management, all other closeout and as-built information can still be collated remotely. <p><i>Parks Master Programme Hagley Parks and Botanic Gardens</i></p> <ul style="list-style-type: none">Design briefs, planning and procurement continue remotely.Can start site surveys for Botanic.Contractors and consultants will be able to commence site visits with the appropriate permission.Research and planning can continue at more detailed level. <p><i>Metro Sports Facility</i></p> <ul style="list-style-type: none">Construction work should be able to commence under Level 3/2 with MoH protocols in place and SSSP approved. Project continues with remote communication. <p><i>Heritage Old Municipal Chambers</i></p> <ul style="list-style-type: none">Procurement, design, planning and specification continue remotely.Erection of the scaffold and wrap may take place following MoH protocols and accepted SSSP, engineer inspections will also be undertakenEngineering inspections can commence.
Social housing asset management updated 14/04/20	Essential service <ul style="list-style-type: none">Covid19 risk management practicesEssential /emergency maintenance only with COID H&S practices applied	Essential service <ul style="list-style-type: none">Covid19 risk management practices Capital programme <ul style="list-style-type: none">Stand up planned capital programme dependent on:<ul style="list-style-type: none">Supply chain (availability)Contractor availabilityH&S plan (ability to maintain distance and hygiene, tracking)Limited “bubbles” on sites to limited risk and allow tracking.Heating phase of Warm and Dry programme delivered under Public Health approved protocols (tenants are a high risk group but health outcome from programme) Maintenance <ul style="list-style-type: none">Priority maintenance (including returning long term closures to service) with Public Health approved COVID H&S practices applied
Technical Services Updated RC 16/04/20	<ul style="list-style-type: none">All staff working remotely from home.Some ongoing IT issues.Contracts Engineers carrying out spot audits on construction sites to ensure there are no H&S issues.	<ul style="list-style-type: none">All staff working remotelySurvey staff recommence survey work in field, usually solo.Contract Engineers recommence full contract monitoring on all contracts that start up post lock down.

	ALERT LEVEL 4 Eliminate	ALERT LEVEL 3 Restrict
	<ul style="list-style-type: none">• One contract currently underway, Belfast Cemetery, classified as essential work, one contract engineer carrying out monitoring work onsite.• One contract about to start, Addington Well conversion, classified as essential work, one contract engineer will be carrying out monitoring work onsite once underway.• One staff member delivering computer equipment to TSD staff (2 days).• Distancing and Hygiene protocols in place.• Hygiene protocols include: equipment and vehicle cleaning procedures before and after being used.	<ul style="list-style-type: none">• Designers recommence attending site visits to progress designs. On an approved case by case basis.• Cost Engineer / Estimator / QS site visit for pricing purpose, usually solo.• Minimal staff in office, UM sign off required, most for short periods of time;<ul style="list-style-type: none">- Surveyors collecting and dropping off equipment, Data transfer.- Contract Engineers photocopying and scanning documents.- CAD/Engineering staff e.g. printing large plots etc.• If possible, a small number of staff would work in the office. Those who are not able to work from home (e.g. no laptop, limited internet etc.) and those who are suffering H&S issues due to unsatisfactory working at home setups. UM sign off required.• Minimise physical contact of those in the office through careful rostering/schedules.• Stay home if unwell or vulnerable.• Continue Distancing and Hygiene protocols.• Hygiene protocols include: equipment and vehicle cleaning procedures before and after being used.

- 9.3. Open transfer stations if we can meet the requirements for safe operation and contact tracing;
- 9.4. Re-open public spaces, such as Botanical Gardens.
- 10. Our Consenting and Enforcement teams have been working remotely during level 4 to keep things moving. They are now ready to step up the number of site inspections and Environmental Health functions.
- 11. Parks teams will continue to work in our urban and regional parks and more crews will in our parks and public spaces. Small gatherings at cemeteries will be permitted to farewell loved ones.
- 12. Call centres will continue to be fully operational so enquiries and service requests can be actioned.
- 13. At the same time, we will continue provide social supports by our staff and civil defence volunteers, including:
 - 13.1. Calls to our residents over 70 years who live alone (3000 calls made);
 - 13.2. Emergency support through our Covid-19 Welfare 0800 helpline;
 - 13.3. Supporting repatriation flights (21 outbound flights supported since 6 April);
 - 13.4. Distributing of food parcels and vouchers (526).

Capital Programme

- 14. **Attachment 2** includes a summary of the projects and services which will be stood up in Alert Level 3.
- 15. These are predominantly projects that were “live” pre Alert Level 4 and were shut down at the direction of government. They are under contract and were in construction.
- 16. There are a few other projects which are being brought forward. These are projects on the approved work programme (i.e. have been approved, have budget and have all the preliminary work completed). They are being initiated sooner because it is best to do these now for variety of reasons. For example, work in a swimming pool that was planned for a few months’ time, and would have required the pool to closed, or partially closed, while work was done, is being done now while the facility is closed. This avoids later inconvenience and loss of revenue. In some areas staff are negotiating faster work (ie extended work days, larger crews) to try to avoid disruption in Alert Level 2.
- 17. A Working Group, comprising the chairs and deputy of the Three Waters Infrastructure; Urban Development and Transport; Sustainability and Community Resilience and Finance and Performance committees, has been established to consider opportunities to prioritise or fast-track projects within the capital programme.
- 18. The Working Group has reviewed and endorsed the attached schedule of projects and services. It has asked for further information regarding projects or programmes that could be brought forward.

Governance Arrangements

- 19. Council has sought advice regarding governance decision-making meetings.
- 20. **Attachment 3**, provides advice from the Head of Community Governance and Support. This advice has been informed by recent NZ Government announcements, staff from the Community Support, Governance & Partnerships and the Legal Services units.

21. The attachment recommends the following:
22. **Council under level 3:**
 - 22.1. Council meetings continue to be held virtually with audio/audio-visual links.
 - 22.2. Where required meetings are livestreamed or recorded.
23. **Council under level 2:**
 - 23.1. Council meetings are conducted in the Chambers with Covid Health and Safety protocols in place.
 - 23.2. The meetings will be either recorded, live streamed or both.
 - 23.3. Any person with compromised health will virtually attend by audio or audio visual link. Any person not wishing to attend can elect to virtually attend by audio or audio visual link.
 - 23.4. There will be limited public access. .Presenters will be encouraged attend by audio or audio visual link or provide written information.
24. **Community Boards under level 3**
 - 24.1. Skype or ZOOM forums not subject to LGOIMA and not formally making decisions.
 - 24.2. Board discussions on preparations for level 2, briefings by governance and board staff and the ongoing development of Board Plans and Board strategic initiatives.
25. **Community Boards under Level 2**
 - 25.1. Boards physically meet in Boardrooms with precautions ensuring a safe workplace.
 - 25.2. Delegated decision-making and briefings by a wider range of staff and other stakeholders can resume.

Regenerate Christchurch Transition

Council Meeting 23 April 2020

1

Context for Transition

- Regenerate Christchurch was established in April 2016 by the Greater Christchurch Regeneration Act 2016 (the Act) to help speed up the regeneration process by facilitating ongoing planning as well as ensuring community and local leadership input in decisions.
- It was established as a temporary organisation, jointly governed and funded by Christchurch City Council and the Crown.
- The 2019 Annual Review of the GCR Act concluded that given the considerable progress on key regeneration milestones, there is no longer a need for the legislation in its current form to support the progressive move towards local leadership in greater Christchurch.
- Christchurch City Council and the Crown have agreed that the transition of Regenerate Christchurch can be brought forward to 30 June 2020.

GCR Act Amendment Bill 2020

This Bill, if passed proposed to amend the Greater Christchurch Regeneration Act 2016 by repealing specific provisions, removing some extraordinary powers that are no longer required, disestablishing Regenerate Christchurch and providing for limited extension of some land powers.

Official documents and records will be transferred to Christchurch City Council.

Assets and liabilities will be transferred under a separate Agreement and this will come to Council for approval and then to the Minister to approve.

No powers or functions of Regenerate Christchurch will be transferred under the amendment bill.

Proposed Process for New Regeneration Plan or amendment for Christchurch district

Proposed from 30 June 2020 following enactment of the amendments in the GCR Amendment Bill

Proponent (Section 14) – ECAN, CCC, Te Rūnanga o Ngāi Tahu or the CE DPMC can be proponents

1. Outline (Section 28-29) Proponent prepares and draft outline
2. Ok to Proceed (Section 31- 32) – Minister must approve the outline
Minister approves the outline – the outline maybe approved or declined
3. Develop and engage (Section 33 - 35– Draft plan or amendment in accordance with the outline.
Views are sought from other parties
4. Approval (Section 38- 39) – Minister approves or declines draft plan
If approved the Minister publicly notifies the Plan or amendment

Timeframes

- 6 March – Amendment Bill first reading
- 23 April – Decision on host agency host and inheriting agency for official records
- 29 April - Select Committee initial briefing on GCR Amendment Bill from DPMC officials and the Committee will hear public submissions
- 30 June – Proposed disestablishment of Regenerate Christchurch

Host Agency

It is proposed that ChristchurchNZ will be the “host agency” for the purpose of hosting a small number of key Regenerate Christchurch staff beyond the disestablishment date in order to decommission the organisation.

Upon agreement to the resolution, the Chief Executive of ChristchurchNZ will progress the development of funding and service agreement for the CNZHL board to consider.

Today's Resolution

- To agree ChristchurchNZ will be the host agency
- Document and Records of Regenerate Christchurch will be transferred to Christchurch City Council
- **Please Note:** That upon agreement of the Crown and Christchurch City Council, it is anticipated that Assets and Liabilities (to be determined and agreed via Agreement to Transfer Assets and Liabilities) of Regenerate Christchurch will be transferred to Christchurch City Council post the formal disestablishment of Regenerate Christchurch. Assets will include any remaining Regenerate Christchurch funds that are expected to outweigh the transferring liabilities. This is subject to final sign-off by Minister for Greater Christchurch Regeneration.

23 April 2020

Ministry of Transport
gps@transport.govt.nz

Christchurch City Council submission on the Draft Government Policy Statement on Land Transport 2021

1. Christchurch City Council ("Council") welcome the opportunity to make a submission on the Draft Government Policy Statement on Land Transport (Draft GPS) 2021.

Summary of key points

2. Council is broadly supportive of the overarching direction in Draft GPS 2021, with its focus on access, environment and safety. In particular, Council has set a target of zero emissions by 2045, and welcomes the focus in Draft GPS 2021 on emissions reductions and mitigating the impact of climate change. Council is also firmly committed to reducing the number of deaths and serious injuries on Christchurch roads, and strongly supports the vision in *Road to Zero* as well as the interim national target of a 40% reduction in deaths and serious injuries by 2030.
3. Council also considers there are a number of key components of Draft GPS 2021 which require amendment, if the Government and its primary funding partners are to successfully implement the ambitious programme of change signalled. The need to clearly focus priorities and transparently target funding has become even greater as New Zealand looks to recover from the impact of the Covid-19 global emergency.
4. The key points in this submission are:
 - A. GPS 2021 needs to provide a greater sense of how funding will be targeted.
 - B. Government and Greater Christchurch councils should collaborate to include the public transport futures investment programme as a core government commitment in the final GPS 2021.
 - C. Sustainable Urban Form should have a dedicated focus.
 - D. The strategic priority "Better Travel Options" should be amended to "Sustainable Transport Options".
 - E. "Improving Freight Connections" should not be a stand-alone strategic priority.
 - F. Police road safety activities should be a separate activity class and the "Safety" strategic priority should have stronger links to other co-benefits.
 - G. GPS 2021 should expressly reference travel demand management initiatives in one or more activity classes.
 - H. Metro rail should form a separate activity class in GPS 2021.
 - I. The GPS should ensure that cost-benefit assessments do not permit disproportionate weight to be given to monetised benefits.

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TRIM:

- J. The GPS should ensure that any provision to increase capacity for additional single occupant vehicles is fully balanced against climate change targets and the extent to which transport contributes to national emissions.
- 5. Recommendations are provided below for each of these key points.
- 6. A table of additional recommendations, targeted to particular paragraphs of the GPS, is appended.

Key recommendations

A. GPS 2021 needs to provide a greater sense of how funding will be targeted

- 7. Draft GPS 2021 sets an ambitious agenda. Council supports the approach of drawing multiple linkages between the strategic priorities, outcomes and co-benefits sought, and enabling major investment projects to receive funding from more than one activity class.
- 8. Council are concerned, however, that Draft GPS 2021 has lost the clearly articulated focus of GPS 2018 on the vital components of a sustainable transport network. These include sustainable transport choices, mode shift, integrated transport and land use planning, and travel demand management.
- 9. The objectives in GPS 2018 have been in force for less than two years, and have not yet been properly implemented. Some of the new strategic priorities in Draft GPS 2021 do not appear to build on the objectives of GPS 2018. This risks creating uncertainty in the transport sector, particularly with respect to investment that has long lead times and high costs.
- 10. Council considers that GPS 2021 needs to identify the highest priority activity types, to avoid the risk of oversubscription of activity classes – a risk that is evidenced by the withdrawal of the Targeted Enhanced Funding Assistance Rate in 2019 due to insufficient targeting. The need for clearly targeted expenditure has become even more vital in light of the anticipated impact of Covid-19. Without a highly disciplined approach, it will be difficult for Waka Kotahi to target the Government's highest priority initiatives.
- 11. Clarity is also required regarding the relevance of government documents other than GPS 2021 to the investment decision making process. In particular, Draft GPS 2021 refers to the Mode Shift Plan underway for Greater Christchurch, and indicates it will be implemented, but does not clearly outline the relevance of such plans to investment decisions. At paragraph 140, Draft GPS 2021 refers to increased investment in "Public transport services and infrastructure, to help to make towns and cities more liveable through achieving the Government's ambitions for mode shift." There is a need for greater transparency regarding the Government's targets and intentions to use mode shift plans as an investment tool.
- 12. Similarly, the extent to which *Arakati* and Waka Kotahi's *Sustainability Strategy and Action Plan* will inform the investment decision making process is unclear. The Statement of Ministerial Expectations also indicates that Waka Kotahi will have a greater role in long-term, integrated planning but does not provide any detail on what this may look like and how it will impact on council planning processes.
- 13. Clarity should be provided on these matters because they will have a fundamental impact on local government planning and investment.
- 14. Finally, GPS 2021 needs to acknowledge the importance of making sure robust data and analytics are in place to support the ambitious programme of change signalled. A number of significant gaps currently exist – for example, accidents that do not get reported, and journeys that do not occur, enabling social and economic exchange, due to lack of access. Implementation

of the Ministry of Transport's Domain Plan should therefore be a specific focus in GPS 2021. As a starting point, data relating to GPS 2021 progress indicators should be made available at both a district and regional level.

Recommendations

15. Council recommends that the strategic direction in GPS 2021 is refined to provide greater guidance on how funding should be targeted.
16. Council recommends that GPS 2021 explicitly outline the highest priority interventions.
17. Council recommends that the highest priority interventions include safer speeds and public transport improvements.
18. Council recommends that GPS 2021 clarify the role and status of national and regional mode shift plans and *Arataki* in the investment decision making process, as well as how Waka Kotahi will have a greater role in long-term, integrated planning for the sector.
19. Council recommends GPS 2021 recognise the importance of robust data and analytics to support the ambitious programme of change signalled, and take steps to ensure that the data which investment decisions are based on is complete (for example, through implementation of the Ministry of Transport's Domain Plan).

B. Government and Greater Christchurch councils should collaborate to include the public transport futures investment programme as a core government commitment in the final GPS 2021.

20. Greater Christchurch currently has a population nearing half a million residents, with the population expected to grow to about 640,000 by 2048. Just under 80% of the Canterbury regional population and about 40% of the South Island population live in Greater Christchurch, emphasising its importance as a strategic regional centre and the primary economic hub of the South Island. Canterbury is the fastest growing region in New Zealand outside Auckland and more population growth is projected in Greater Christchurch over the next 30 years than other high growth cities, such as Hamilton, Tauranga, Wellington and Queenstown.
21. Significant work is being undertaken by local and central government to determine what type of public transport system evolves in Greater Christchurch over the next 30 years, including options for the provision of mass rapid transit. This work highly aligns with the Better Transport Options strategic priority, and Draft GPS 2021 references the work on this transformation change at page 19, as follows:

Waka Kotahi will take a more proactive role in accelerating mode shift by partnering with local government and other agencies to shape urban form, make shared and active modes more attractive, and influence travel demand and transport choice. This includes progressing work that is already well underway on developing a public transport system in Christchurch.

22. A programme of investment for the 2021 long-term planning cycle is currently being prepared by Greater Christchurch partner councils and Waka Kotahi. Council considers this work will significantly contribute to the implementation of GPS 2021 in Greater Christchurch.
23. There is, however, a serious affordability issue that needs to be addressed if the desired transformation is to be achieved. This affordability issue will be exacerbated by the economic impact of COVID-19, though at the same time communities will have more need than ever of access to sustainable active and public transport options and land use planning which supports efficient network planning and liveability. Without assistance from the Government through the GPS and National Land Transport Fund (NLTF), it will be difficult to address the major barriers to

increasing uptake of public transport – for example, the current frequency and competitiveness of services.

24. If the Government wishes to pursue mode shift, sustainable transport modes need a greater level of funding – whether this is through a higher Funding Assistance Rate, a contestable fund like the Urban Cycleways Fund, or another mechanism. A preliminary indicative assessment of the likely costs is around \$60 million in years 1-3 and an additional \$50 million in years 4-10. Section 3.1 (Funding land transport) suggests that the Government will look at new ways of making optimal funding and financing decisions, but Council is concerned that the focus of this section is on local government needing to find alternative funding sources for significant projects, particularly as there is no guidance on what those funding sources might be.
25. Council also notes that there are only modest increases in walking and cycling funding in Draft GPS 2021, despite the stated commitment to mode shift and the significant changes that are occurring in urban development and the way people move on footpaths and road margins.
26. Council would welcome the opportunity to collaborate with the Government and partner councils to include the public transport futures investment programme as a government commitment in the final GPS 2021.

Recommendations

27. Council recommends that the Government and Greater Christchurch councils collaborate to include the public transport futures investment programme as a core government commitment in the final GPS 2021.
28. Council recommends a greater increase in walking and cycling funding.

C. Sustainable Urban Form should have a dedicated focus

29. Integrated transport and land use planning was a key theme in GPS 2018. Council is concerned that this strong focus in GPS 2018 has not been carried over with sufficient emphasis to Draft GPS 2021.
30. To ensure land use planning supports sustainable and efficient transport network planning, the GPS should set clear signals for investment decision making as well as for the GPS on Housing and Urban Development. To achieve this, GPS 2021 should signal clearly that urban intensification is needed to support the effective operation of metro public transport systems. At present, transport investment decisions can be heavily influenced by privately made choices about where to live which impose significant external costs and lead to inefficiencies. Draft GPS 2021 states that transport investment will be in line with the Urban Growth Agenda. The Urban Growth Agenda, through the National Policy Statement on Urban Development, identifies urban intensification as a key driver for promoting sustainable urban development.
31. In addition to the importance of intensification in metro areas along public transport corridors, GPS 2021 should expressly articulate the importance of the following factors:
 - Land use planning and consenting to promote local availability of primary needs, rather than just facilitating access to them.
 - Well-planned location of supermarkets, pharmacies, doctors, and educational facilities, so that all neighbourhoods have easy/close access to these essential businesses, rather than relying on high mobility for all people.

Recommendations

32. Council recommends that sustainable urban form is dedicated focus to ensure GPS 2021 sets a clear expectation that decision makers must fully integrated transport and land use planning and investment decisions.
33. Council recommends ensuring GPS 2021 establishes clear signals for the proposed Government Policy Statement on Housing and Urban Development regarding sustainable urban form.

D. The strategic priority “Better Travel Options” should be amended to “Sustainable Transport Options”

34. Council supports the focus on access in Draft GPS 2021. Council is concerned that “Better Travel Options” places too much emphasis on mode choice as a means to an end, and would include single occupant vehicle travel. Council considers the focus should be on transport choice as a means to other desirable outcomes, such as emissions reduction, safety and amenity. Council considers that “Better Travel Options” should explicitly include sustainability. If the Government’s ambitious emissions targets are to be achieved, the link between transport choice and environmental sustainability needs to be articulated in all government policy, from strategy to delivery.
35. Council suggests terming this strategic priority, “Sustainable Transport Choices”, noting that the word “sustainable” also incorporates the idea of maintaining or improving social, cultural and economic wellbeing.
36. Council considers a number of other revisions would strengthen this strategic objective as follows:
 - The co-benefit of improving health and wellbeing through active transport should receive greater recognition in the discussion on this strategic priority.
 - Safer routes to schools and safer speeds around schools should be a priority focus to encourage active travel, as per the announcement by Hon Julie Anne Genter on 28 November 2019.

Recommendations

37. Council recommends “Better Travel Options” be amended to “Sustainable Transport Options”.
38. Council recommends the statement, “Provide people with better transport options to access places for earning, learning, and participating in society” be amended to “Provide people with sustainable transport options to access places for earning, learning and participating in society”.
39. Council recommends that safer routes to schools and safer speeds around schools be a priority focus, to encourage active travel.

E. “Improving Freight Connections” should not be a stand-alone strategic priority

40. Council supports the modal optimisation of freight. In 2019, a major transport study commissioned by the South Island Regional Transport Committee Chairs Group found that rail freight is an economic way to take pressure off South Island roads. It found potential for a \$20-\$30 million investment in rail projects to save up to \$12-\$18 million annually, when wider economic impacts are considered. A copy of the study is available [here](#). The Government has been invited to take up the recommendations in this report and work with KiwiRail and local government to enable the transformation the report outlines.
41. Including rail freight and coastal shipping with the GPS is a new approach. At present, most activity classes do not have a strong connection to mode shift or freight connections. The two

dedicated activity classes which do – “rail network” and “coastal shipping” – are aimed primarily at KiwiRail and the coastal shipping sector, rather than councils.

42. Nonetheless, when councils seek funding from the NLTF they will need to demonstrate the highest alignment possible with GPS strategic priorities. Council is concerned that a priority of “Improving Freight Connections” may lead to or favour investment proposals that increase capacity and encourage Single Occupancy Vehicle travel, such as the Roads of National Significance programme has done. These programmes have resulted in significant investment being required to mitigate the negative social, environment, economic and safety downstream impacts of significant increases in the number of vehicles on our roads.
43. Council supports the role of GPS 2021 in promoting freight mode shift and improved freight connections, but considers freight mode shift and improved freight connections should be important components of a broader resilience strategic priority, rather than a standalone strategic priority. Resilience is a serious concern for councils, in terms of lifelines as well as freight routes. This approach would:
 - Allow Councils and Waka Kotahi to demonstrate high alignment to GPS strategic priorities for safety, and active and public transport initiatives, by also demonstrating resilience benefits without needing to specifically demonstrate how activities will enhance freight mode shift/connections.
 - Allow KiwiRail and the Coastal Shipping sector to apply under the rail network and coastal shipping activity classes to progress activities relating to mode shift and freight connections.
44. Council also recommends that further explanation is provided regarding sources of funding for the rail network and coastal shipping activity classes.
45. Finally, Council supports the delivery objective, “Improve the safe and efficient movement of freight and logistics planning and network optimisation.” However, given the strong emphasis in Draft GPS 2021 on co-benefits, Council considers that GPS 2021 should provide more direction as to how road controlling authorities can direct freight to use certain corridors and avoid others, particularly those routes that go past schools. This would strongly support implementation of the Safety strategic priority.

Recommendations

46. Council recommends replacing the strategic priority of “Improving Freight Connections” with “Resilient Connections” with freight mode shift and freight connections forming important components of this priority.
 47. Council recommends GPS 2021 clarify the sources of funding for the “rail network” and “coastal shipping” activity classes.
 48. Council recommends GPS 2021 provide more guidance as to how road controlling authorities can direct freight to use certain corridors and avoid others, particularly those routes that go past schools.
- F. Police road safety activities should be a separate activity class and the “Safety” strategic priority should have stronger links to other co-benefits**
49. Council supports the focus on investment to implement *Road to Zero*. Council also supports the commitment by the Government to ‘Increase access to safer modes (e.g. public transport), with initial priority in Auckland, Tauranga, Hamilton, Wellington, Christchurch and Queenstown’ (page 17). Council considers enhanced public transport investment and safer and slower urban roads are both critical safety interventions. Council also considers there is an opportunity for

road safety activities to form an important part of the proposed economic stimulus package, including interventions such as mass roll-out of speed humps and raised platforms.

50. Council is fully committed to working in partnership with central government and other partners to improve road safety. Collaboration is vital for looking at how we can most effectively deliver behaviour change campaigns, speed management and infrastructure improvements to reduce deaths and serious injuries on our roads. Council considers a greater level of funding from central government will be required to deliver on the ambitious signals in *Arataki* around behaviour change and road safety education.
51. Council supports collaboration by Police and partner organisations to implement *Road to Zero*. Council notes that Draft GPS 2021 has included road policing, automated enforcement, and road safety promotion all in the same activity class as safety infrastructure. While it can be helpful to take a holistic approach, this creates unnecessary inter-agency competition for funding, where competing agencies have quite different roles. This is particularly so when activities such as safety and red-light cameras are clearly needed/committed and should be quantified and separated out. In this respect, it is not clear what proportion of funding will be available for council safety-related programmes, once funding has been allocated to police activities, nor what is needed for activities that are already committed.
52. Council therefore recommends that, while police road safety activities should be carried out in collaboration with partners, police activities should form a separate activity class.
53. Council also considers there is a need to provide clearer links between the Safety strategic priority and other co-benefits as follows:
 - There is a missed opportunity to think about health and safety. Deaths relating to sedentary lifestyles have a high order of magnitude and active transport has an important role to play in supporting public health.
 - Land use is mentioned in road safety, but the need for land use planning to support a reduction in car dependency is not. There are significant external costs associated with increases in the use of cars, of which safety is one.
 - Crashes involving vulnerable road users (ie cyclists and pedestrians) should be a measure given that inclusive access is identified as a co-benefit.

Recommendations

54. Council recommends a particular focus on safer and slower urban roads, and that road safety interventions should form part of the proposed economic stimulus package.
55. Council recommends that police activities are included in a separate activity class.
56. Council recommends providing clearer links between the Safety strategic priority and other co-benefits, in particular the links with health and land use planning.
57. Council recommends that crashes involving vulnerable road users are also an identified measure.

G. GPS 2021 should expressly reference travel demand management initiatives in one or more activity classes

58. Draft GPS 2021 states at paragraph 98 that “demand management initiatives (including promotional activities) will be developed as part of transport planning and business case processes, and then funded from the most appropriate activity class”. Council supports this approach as it will enable councils and Waka Kotahi to incorporate travel demand management activities into infrastructure and service projects from the outset and to form a part of projects relating to new assets. Council also supports the signalled focus on making the most of our land transport system.
59. At the same time, it has historically been difficult to obtain funding for travel demand management. As such, Council considers that express reference to travel demand management initiatives should be made in one or more activity classes. This would send a strong and visible signal about the importance of such initiatives, which might not be as compelling if no activity classes were to expressly reference travel demand management. It would mitigate the risk that the move from a single travel demand management activity class to incorporating travel demand management in all activity classes, could lower investment and compromise outcomes. GPS 2021 needs to clearly demonstrate that travel demand management is a core strategy for achieving the strategic priorities.
60. Council also considers it would be helpful for the GPS to clarify whether demand management refers only to behavioural change or whether it encompasses all aspects of mode shift and travel demand management (both “soft” and “hard” measures).

Recommendation

61. Council recommends that GPS 2021 expressly reference travel demand management initiatives in one or more activity classes.
62. Council recommends that GPS 2021 clarifies whether demand management refers only to behaviour change or whether it encompasses all aspects of mode shift and travel demand management.

H. Metro rail should form a separate activity class in GPS 2021

63. Council agrees in principle with a mode neutral approach to funding transport investment. However, Council considers metro rail should form a separate activity class in GPS 2021 for the reasons outlined below. This approach could be reviewed for GPS 2024.
64. GPS 2018 included a separate transitional rail class focused on specific projects in Auckland and Wellington. Draft GPS 2021 establishes an activity class of “public transport infrastructure” which includes rapid transit funding (for busways and light rail infrastructure) and metro rail. Rail is not as prevalent in the South Island as it is in the North Island, and both Draft GPS 2021 and the Draft New Zealand Rail Plan make it clear that the focus of government investment in rail over the three-year term of GPS 2021 is on rail in Auckland and Wellington. Paragraph 123 of the Draft GPS also states that:

Projects approved under the transitional rail activity class for the Auckland and Wellington metropolitan rail networks and certain approved inter-regional rail projects will now be funded through the public transport infrastructure activity class.

65. The GPS forecasts expenditure of \$16.3 billion for the Auckland Transport Alignment Project (ATAP) from 2018 to 2028 and \$3.8 billion for Let’s Get Welly Moving (LGWM) from 2021 to 2041. However, it does not outline the immediate impact on the NLTF over the next three years, how much of this expenditure will come from new Crown funding, and how much of this

expenditure pertains to rail. It also does not clarify whether this funding includes or is in addition to the multi-billion upgrade programme announced in December 2019.

66. Council is concerned a significant amount of NLTF funding from the public transport infrastructure activity class could be required to upgrade network infrastructure in the North Island over the next three years, but this has not been made transparent. It is particularly important to be transparent about funding allocations given the potential for operational expenditure for any new rail to be high over the three-year term of this GPS, until commercially viable patronage levels are reached.
67. Ultimately, Council is concerned that this approach could impact on the ability of Greater Christchurch councils to access funding needed to both maintain public transport infrastructure and achieve the significant transformation the Government is seeking in Greater Christchurch.

Recommendations

68. Council recommends that metro rail be included as its own activity class in GPS 2021 so relevant funding allocations are transparent.
69. Council recommends Table 4 ("Investment expectations for Government Commitments to be met in NLTPs") in section 3.5, outline the funding that will be required in the three years of GPS 2021, and the extent to which funding (both over this three year period and over the term of the investment) will come from sources other than the NLTF.

I. The GPS should ensure that cost-benefit assessments do not permit disproportionate weight to be given to monetised benefits

70. Draft GPS 2021 indicates that "the principle of efficiency within value-for-money does not necessarily mean selecting the lowest price, but rather the best possible outcome for the total cost of ownership..." (Para 92). Draft GPS 2021 also makes it clear that this includes considering monetised and non-monetised costs and benefits. Council supports this approach and notes that it is important that non-monetised benefits are included in the judgement of value for money, particularly as these can reflect broader benefits of transport investment not captured in monetised benefits, such as improved amenity and improved accessibility.
71. However, Draft GPS 2021 also suggests that cost benefit analysis will likely be used to assess total cost. Council is concerned that using the established technique of cost benefit analysis will give too much weight to monetised benefits when value is considered. There are acknowledged limitations of monetised benefits and cost benefit analysis, particularly when wellbeings and broader outcomes achieved by transport projects are considered, such as amenity and improved accessibility rather than travel time savings. Taking this into consideration, Council is concerned that an overemphasis on cost benefit analysis could lead to perverse outcomes in the same way that selecting the lowest price can.

Recommendation

72. Council recommends that paragraph 92 be amended as follows (proposed new text added in **bold**):

*The principle of efficiency within value for money when procuring goods or services does not necessarily mean selecting the lowest price but rather the best possible outcome for the total cost of ownership [or whole-of-life cost]. This includes considering the appropriate funding source and the whole life costs and benefits [both short and long-term and monetised and non-monetised]. An established technique supporting this is cost benefit analysis. **Noting that traditional cost-benefit analysis has tended to focus on monetised benefits and costs, the NZ Transport Agency will need to ensure the framework used to assess value for money includes appropriate consideration of non-monetised benefits and costs.***

J. The GPS should ensure that any provision to increase capacity for additional single occupant vehicles is fully balanced against climate change targets and the extent to which transport contributes to national emissions

73. Draft GPS 2021 indicates that there is still funding available for capacity increases (for example paragraph 97 notes that demand management should be considered as supplementary to any increase in road capacity) and local road and state highway improvements activity classes refer to improving capacity.
74. It is reasonable to assume that capacity increases enable and induce additional private vehicle movements and therefore Vehicle Kilometres Travelled, irrespective of the supporting measures to encourage mode shift (the overall generalised cost of travel is simply reduced making both single occupant vehicle and alternate modal travel more attractive and therefore more likely to occur).
75. Unless the uptake of zero emission vehicles (such as electric vehicles) occurs at a rate greater than the traffic induced as part of capacity increases, emissions will rise, in conflict with central and local government emission targets.
76. Any increase in capacity will inevitably lead to increases in traffic, either carbon emitting or otherwise, which will also adversely impact congestion downstream of the capacity increase and associated worsening of road safety outcomes.
77. Investment in alternative modes can provide more available capacity for single occupant vehicles by transferring single occupant vehicle trips onto more sustainable modes. In order to mitigate the likely of induced demand to fill this available capacity, either reducing this capacity, or appropriately pricing this capacity should be considered.
78. Paragraph 13 of Draft GPS 2021 states that:
- As announced in December 2019, the Crown will invest \$6.8 billion in land transport infrastructure. This will fund specific projects to speed up travel times, ease congestion and make our roads safer by taking trucks off them and moving more freight to rail. They will help further the strategic priorities of GPS 2021. This funding supplements the activity classes, which display investment from the Fund only".*
79. Council disagrees that investment in land transport infrastructure will ease congestion in the long term without some form of pricing to manage demand. It will also make it more difficult to implement the priorities in GPS 2021. Council considers the focus of investment should be about access and providing sustainable transport choices.

Recommendation

80. Council recommends that the focus of investment should be about access and providing sustainable transport choices which improve social, environmental and economic outcomes for society and minimise such costs. This does not include additional capacity for single occupant vehicles.

Additional recommendations

81. The table appended outlines our recommendations targeted at particular paragraphs in Draft GPS 2021.

Regards

Mayor Lianne Dalziel
Christchurch City Council



Appendix: Summary of targeted recommendations

The following table outlines Council recommendations regarding amendments to specific paragraphs in Draft GPS 2021.

Paragraph, page, section	Comment	Council recommendations
Paragraph 44, page 13, section 2.1 (The Strategic Priorities for GPS 2021)	Under “Better Travel Options”, economic considerations are separated out from social, environmental and cultural wellbeing – ie “...healthy environments that improve wellbeing and economic prosperity”. This kind of messaging will risk continuing to elevate financial considerations above all other wellbeings in investment decision making.	Key messaging in GPS 2021 should refer to the four well-beings in the Local Government Act 2002 and should not separate out economic considerations from all other wellbeings.
Paragraph 45, page 13, section 2.1 (The Strategic Priorities for GPS 2021)	Under “Improving Freight Connections” there is no mention of sustainability.	Improving Freight Connections should not be a stand-alone priority. Where it is discussed, the need for sustainable freight movements should be emphasised.
Paragraph 58, page 16, section 2.2 (Strategic Priority: Safety)	Paragraph 58 states that “Safer travel includes security measures to prevent deaths and injuries from malicious acts.” It is not clear what is meant by “malicious acts”.	Council seeks that “malicious acts” are explained.
Page 17, section 2.2 (Strategic Priority: Safety)	Page 17 outlines the following delivery focus, “Shape land use, urban form and street design in a way that reduces car dependency, makes walking, wheeling, cycling and micro-mobility safe and attractive travel choices, and reduces emissions from transport.” It is unclear how the land will be shaped to improve the urban form and street design. For example, Council considers urban intensification should be a priority and greater investment is needed in footpaths and cycleways.	GPS 2021 should define how the “urban form” and “street design” will be shaped to deliver outcomes. This will provide clearer direction for Waka Kotahi to implement through the Investment Assessment Framework.

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TRIM:

Pages 16-17, section 2.2 (Strategic Priority: Safety)	There is a need to expressly consider the safety needs of children who need to travel, including gaining independence to access education, play, and socialising.	Include consideration of safety for young children.
Paragraph 61, page 18, section 2.3 (Strategic Priority: Better Travel Options)	Paragraph 61 states, "The primary focus of this priority is to improve people's ability to get to places where they live, work and play and to make sure our major cities have transport networks that are fit-for-purpose." Greater recognition should be provided to the need to access crucial retail, healthcare and educational services. This, for example, should encourage the Ministry of Education to consider access when relocating schools.	Amend paragraph 61 to, "The primary focus of this priority is to improve people's ability to access essential businesses; places where they live, work, educate and play; and to make sure our major cities have transport networks that are fit for the future."
Paragraph 62, page 18, section 2.3 (Strategic Priority: Better Travel Options)	Cultural well-being is missing from the discussion of co-benefits.	Include cultural wellbeing in the discussion of co-benefits.
Tables 1 and 2, pages 24-25, section 2.6 (Indicators for how progress will be measured)	There is no indication as to whether or how the five transport outcomes will be weighted.	Clarify whether transport outcomes will be weighted, and if so, how.
Paragraph 143, page 39, section 3.7 (Statement of Ministerial Expectations)	Bullet 5 of paragraph 143 states that the Minister expects that Waka Kotahi will "... encourage future-focused planning, such as through designating and authorising land use for transport, to provide certainty to the sector and communities". Designating land use for transport, is not a concept that is used in other strategic documents, so it is not clear what is meant. Designations are a specific tool in the Resource Management Act 1990 for network utilities, and not necessarily land use.	Replace bullet 5 of paragraph 143 with the following text, "encourage future-focused planning, such as providing for higher density land use along public transport corridors, to provide certainty to the sector and communities".
Page 46, Appendix 3 (Summary of key policy direction documents)	ATAP is included in the list of key policy direction documents. ATAP is a regional plan. Only nationally issued documents should be included in the list of key policy direction documents.	Remove ATAP from the summary of key policy documents in Appendix 3.

Council Submission on the Accessible Streets Regulatory Package

Date: 23-04-2020
From: Christchurch City Council
To: New Zealand Transport Agency

Introduction

The Accessible Streets Regulatory Package is a draft of proposed changes to:

- Land Transport Rule: Road User
- Land Transport Rule: Traffic Control Devices
- Land Transport Rule: Setting of Speed Limits, and
- Proposed new Land Transport Rule: Paths and Road Margins 2020.

The proposed changes will create a national framework clarifying the types of vehicles and devices that are allowed on footpaths, shared paths, cycle paths and cycle lanes, and how they can use these spaces. It includes a proposed 15km/h speed limit on the footpath and a requirement for all other footpath users to give way to pedestrians (a term which also includes wheelchairs and powered wheel chairs).

The rules also clarify how road controlling authorities may regulate pedestrians, devices and spaces like the footpath; and propose changes to the priority given to a range of road users to remove barriers to walking, device use, cycling and public transport.

Overview of Submission Points

The status quo is not fit for purpose in this rapidly changing world

Christchurch City Council welcomes the government's proposed range of changes outlined in the consultation documents. Ōtautahi Christchurch is a city of opportunity for all, open to new ideas, new people and new ways of doing things. In recent years, new technologies have changed the way people travel within our city, and it has become evident that the existing rules are inconsistent and no longer fit for purpose.

Through our strategic framework, we are seeking to build safer and healthier communities by supporting active transportation. We are also creating a more liveable city by ensuring it is well connected and accessible by public transport. Historically, our road rules have largely prioritised private vehicles at the expense of active and public modes of transportation. This has made it more dangerous for pedestrians and cyclists at intersections and contributed to unreliable journey times for public transport. Additionally, there are a growing number of new and varied transport devices being used on our paths and streets. This has highlighted the inadequacy of our infrastructure and regulatory systems considering the broad range of user ages, abilities, and needs on our city streets and paths.

The focus must continue to be on our most vulnerable

As new transport modes and technologies emerge, we need to develop new travel behaviours that look out for our most vulnerable. It is important that people who regularly and primarily use footpaths as a means of transport feel safe in our urban environment. It is also essential that people who do have a wider range of travel choices feel safe and comfortable when choosing public and active modes of transport.

While Council supports the overall aims and objectives of the regulatory changes, there are a handful of technical aspects that appear to go against the grain of what the changes are intending to achieve. Specifically there are proposed changes around speed limits on footpaths and shared paths. Both of these proposals run counter to long-established social norms and user behaviours and may present several risks.

Striking the right balance is difficult, but we wish to highlight that attention and consideration must first be given to groups such as the young or people with restricted mobility when finalising the proposed changes.

We cannot rely solely on these rule changes to solve our problems

While these new rules and regulatory frameworks help address many issues on our city streets, they are not a panacea. Public education and messaging are critical tools in changing behaviour and building a collective understanding about safe and acceptable behaviours on our paths and streets. Council encourages NZTA to assist and work closely with local authorities in delivering the required messaging around these regulatory changes. The travelling public may not be aware of the need for change and therefore not adapt their behaviours accordingly. The risks of unchanged behaviour are not inconsequential. For example, many footpaths are narrow and access is already inhibited by rubbish bins, inappropriately parked cars, postal vehicles and e-scooters. We are hopeful that the proposed framework will help bring clarity and consistency to current rules. However, we believe the scale and magnitude of communication and education efforts needs to be significant if these rule changes are to proceed.

Finally, as with any proposed change at a national level, there will be unbudgeted costs for local authorities in order for changes to be successfully implemented. Given recent financial uncertainties posed by COVID-19, many authorities will be in a challenging position to meet these costs. NZTA and the Ministry should be conscious of this and review allocated budgets for implementation accordingly.

Specific submission points on the proposals

Proposal 1: Change current vehicle and device definitions and create new categories to better regulate new and emerging devices as well as where and how they're used.

Council broadly supports the proposal to create new categories of vehicles and users to better reflect the types of vehicles that are more commonplace on our city streets. However, with new codes and classifications comes the need for more signs and markings to communicate rules and regulations to the public. In finalising the regulatory proposals, Council submits that the Agency considers ways in which traffic control devices can be consolidated and rationalised. This would both reduce costs for local authorities and cut down on excessive visual clutter for road users.

Proposal 1A: Pedestrians and powered wheelchairs users

Council agrees with the proposal to create a new category of power chair users and treating them the same as pedestrians and wheelchair users. This change helps to recognise the similarities in risk between powered wheelchairs, unpowered wheelchairs and pedestrians, and sets them apart from a person using a much larger, faster and higher risk mobility device, like a high-speed mobility scooter.

Proposal 1B: Changing wheeled recreational devices

Council agrees with the proposal to replace the existing category of wheeled recreational devices with new categories for unpowered and powered transport devices. Before considering a device to be/not be a motor vehicle the Agency is encouraged to take a risk based approach and consider both the mass and velocity of the vehicle in making their determinations. Heavier and faster vehicles will pose more of a risk to users than lightweight, low-speed devices.

Currently there are a large number of powered transport devices where there is no declaration they are not a motor vehicle (for example e-skateboards). Many owners and users of these devices will be seeking reassurances about if and when they will be able to use these devices on paths and streets. Council suggests that the Agency moves swiftly to recognise and clarify which powered transport devices it will declare not to be a motor vehicle.

Proposal 1C: Clarifying cycles and e-bikes

Council agrees with the proposal to keep cycles a legally separate category of vehicle to transport devices. Despite the fact that in terms of speed and weight, bicycles (including e-bikes) are not fundamentally different to many powered and unpowered transport devices on the market, it is logical to keep a separate definition (especially when the proposal is to keep the helmet rule to apply only to cycles).

As the form of powered transport devices continues to evolve, it is difficult to codify common standards and specifications. Conversely the basic design of the bicycle has remained largely unchanged in 140 years so common design and assembly practices have evolved to ensure user safety. The AS/NZS Standards and Product Safety Standards (Pedal Bicycles) Regulations 2000 are helpful in ensuring that manufacturers and retailers can adhere to a common set of standards, but aren't a legal requirement for roadworthiness. Council believes there is a continued role for the Ministry of Business, Innovation and Employment in protecting consumer safety.

Proposal 1D: Mobility devices

Council agrees with the proposal that Mobility devices have the same level of access as pedestrians but must give way to pedestrians.

Proposal 2: Establish a national framework for the use of footpaths

Council supports the establishment of a national framework for all footpath users. The status quo is inconsistent and unclear, and the proposal appears to create a logical framework to help the public distinguish between who *can* be on the footpath and who *should* be using the footpath. Current rules regarding footpath use are outdated and out of step with the existing norm of footpath cycling. While this should by no means be widely encouraged, there are in some cases no safe sections of the roadway for children to cycle. Additionally, the fact that e-scooters are permitted on footpaths but cycles aren't, appears arbitrary and ripe for change.

Above all, simply changing the rules and establishing a framework will be in vain if it is not accompanied by a thorough and widespread education campaign. Council is concerned that the funding estimates for the campaign outlined in the regulatory impact statement may not be enough to adequately inform the public.

Council believes it will be clearer if new decisions (regulating use of paths and speed limits) under that new Paths and Road Margins rule are specified to be made by resolution.

Council tentatively supports having to consider and follow criteria in addition to their usual resolution processes in order to restrict devices from using the footpath. However we expect local authorities to be extensively consulted and engaged on this criteria before it is put in place.

Proposal 2A: Users on the footpath will operate vehicles in a courteous and considerate manner, travel in a way that isn't dangerous and give right of way to pedestrians

Council strongly supports the use of footpaths under the proposed land transport rule. A clear logical hierarchy of users and right of way is needed as these spaces become more crowded and the use of various transport devices becomes more common. It is critical that a widespread education campaign accompanies any rule changes to ensure courtesy and respect become common behaviours among all footpath users.

Proposal 2B: Default 15km/h speed limit for vehicles using the footpath

Cycling on footpaths has long been a prohibited activity because it has been deemed unsafe both for cyclists and other users of the footpath. However, Council recognises that there are at times, real world practicalities that often mean the footpath provides the safest option for the user (e.g. for children, novice riders or in certain traffic contexts). Council supports the need to change the status quo, as 80% of children who participate in the Cycle Safe Skills programme require more practice with an adult before going on-road alone. Relying on adults for accompaniment can limit independence, and provide a barrier for more children to take up cycling as a means of transport. However, the proposed changes signal that all cyclists will be able to legally to use the footpath at a limited speed of 15km/h. This could result in a number of unintended consequences, such as:

- Increased conflicts between pedestrians and vulnerable users
- Developing perceptions and norms that bicycles belong on the footpath
- Persistent risk of vehicles and driveways given the bidirectional flows on footpaths

Council wishes to be clear that, footpaths are not appropriate places for adults on bicycles. We do not want to see, allow or encourage increased numbers of bikes on footpaths and have concerns that the proposed rule change would permit this. Council believes that implementing guidance or restrictions around age limits and footpath cycling is more appropriate.

Proposal 2C: 750mm width restriction for vehicles that operate on the footpath

Council agrees with the proposed maximum width for footpaths (excluding wheelchairs and power-chairs). As imported 'micro-cars' become more commonplace it is important to set clear expectations about the maximum width of these devices and where they can and cannot be used.

Proposal 3: Establish a national framework for the use of shared paths and cycle paths

Council supports the proposed framework for the use of shared paths and cycle paths. Like the proposed framework for footpaths, it is important to underscore the hierarchy of user vulnerability and subsequent give way rules. Additionally the Council welcomes the ability for local authorities to implement speed restrictions on shared paths as occasionally this will be necessary.

As Christchurch has an extensive number of shared paths within the city, Council has an interest in the proposals concerning shared paths. The draft rules propose that pedestrians have priority on shared paths but the default limit on shared paths is 50km/h. Council believes that these rules are incompatible, send mixed signals, and pose serious risks for pedestrians. Pedestrians cannot feel safe in an environment while simultaneously the speed limit is than ten times the average walking speed. While the proposed rules enable local authorities to set lower different speed limits, Council believes that a lower national default limit would be more appropriate.

Council also does not think the Transport Agency should be able to investigate and direct road controlling authorities to comply with the required criteria for shared path restrictions without first being consulted on the specific guidance and criteria.

Proposal 4: Enable transport devices to use cycle lanes and cycle paths

Council supports the proposal that devices other than cycles should be allowed to use cycle lanes and cycle paths. The emergence of lightweight, powered transport devices has made it apparent that the existing rules are out of step with common and safe behaviour. By enabling and encouraging these devices to use cycle facilities there will be benefits to be gained by a more universal range of users accessing the infrastructure.

Proposal 5: Introduce lighting and reflector requirements for powered transport devices at night

Council supports this proposal and this is already a requirement for shared e-scooter trading permits.

Proposal 6: Remove barriers to walking, transport device use and cycling through rule changes

Council supports the proposal to increase the safety, convenience and attractiveness for active modes. Many people regularly and primarily rely on walking and cycling as a means of transport, but they are not prioritised under the existing rules and at times, severely disadvantaged. Crash statistics reveal just how vulnerable these users are, so efforts to increase their visibility and safety are welcomed by Staff.

Proposal 6A: Allow cycles and transport devices to travel straight ahead from a left turn lane

Council supports this proposal as it makes common and safe behaviour by cyclists legal.

Proposal 6B: Allow cycles and transport devices to carefully pass slow-moving vehicles on the left, unless a motor vehicle is indicating a left turn

Council supports this proposal as it makes common and safe behaviour by cyclists legal.

Proposal 6C: Give cycles, transport devices and buses priority over turning traffic when they're travelling through an intersection in a separated lane

Council supports this proposal as it clarifies an existing ambiguity in current rules. To ensure user safety Council has extensively installed traffic signals to control separate movements by people travelling in separated cycleways alongside main road traffic. This proposal only applies in situations where there are no traffic control devices that would otherwise control an intersection. Therefore over time, cost of constructing cycleways may be reduced as it may be safe to do so without the need for signs and signals.

Proposal 6D: Give priority to footpath, shared path and cycle path users over turning traffic where the necessary traffic control devices are installed

New Zealand is one of the few countries in the world where pedestrians do not have right of way when travelling parallel to the main road when they are crossing a side street. As a result, the attractiveness and convenience of walking over driving is greatly diminished. Council strongly supports the proposal, however encourages the Agency to recognise that in order to realise benefits, more funding needs to be made available both for intersection treatments and education campaigns.

Proposal 7: Mandate a minimum overtaking gap for motor vehicles passing cycles, transport devices, horses, pedestrians and people using mobility devices on the road

Council supports the proposal to implement a minimum overtaking gap for cyclists. However there appears to be little rationale as to why the proposed minimum is 1m instead of 1.5m. The official road code recommends 1.5m so the proposal would create an inconsistency. Council submits that the minimum gap on roads less than 60km/h should also be 1.5m. The disadvantages of a 1.5m gap are not discussed in the accompanying regulatory impact statement.

Proposal 8: Clarify how road controlling authorities can restrict parking on berms

Council's expectation is that our current Traffic and Parking Bylaw berms clause, which is made under clause 6.2(2) of the Land Transport Rule, will still apply to our management of berms, and will not need amendment as a result of this proposal. We submit that a 'to avoid doubt' clause be added to the new rules to ensure that is the case for any such existing bylaws/bylaws made under new clause 6.2(2)(b), otherwise we anticipate the new rule may cause further confusion.

Proposal 9: Give buses priority when exiting bus stops

The Council strongly supports the proposal to give priority to buses when exiting bus stops. A key issue identified in the Regional Public Transport Plan is that the current public transport system can be unreliable and many journey times are not competitive with the private car.

Summary

Christchurch City Council thanks the New Zealand Transport Agency for the opportunity to submit on the proposed changes contained within the Accessible Streets package. We believe that the proposals are a step in the right direction and will be critical in developing a framework in which to manage the increasing and diverse range of users on our streets and paths.

Currently, the use of some vehicles and devices is permissible in some locations, and not in others. This binary and inflexible definition leaves no room for the Agency or local authorities to provide better guidance to users about appropriate hierarchies and behaviours on our streets and paths.

We would urge the Agency in their communication and education campaign efforts to highlight that pedestrians (and wheelchair users) are the dominant mode on footpaths. While the proposals allow for footpaths to be used by other modes, they must give heightened care and consideration to pedestrians to ensure they have the right of way. There is a risk that if these messages are not communicated properly, the aims and objectives of the rule changes could be thwarted. Additionally, people who regularly and primarily rely on footpaths for transport could be adversely affected. With that in mind, the success of the rule changes hinges on the success of the subsequent educational and communication campaigns. There are a lot of changes for the public to consider and they move the national road user culture in a new direction. This adjustment will be very different to the behaviours and norms people have become accustomed to in the past. Local authorities are close to their communities and well placed to support the Agency with these messages if sufficient resources to assist are provided.

Yours faithfully,