
Christchurch City Council SUPPLEMENTARY AGENDA NUMBER 2

Notice of Meeting:

An ordinary meeting of the Christchurch City Council will be held on:

Date: Wednesday 6 September 2023
Time: 9.30 am
Venue: Council Chambers, Civic Offices,
53 Hereford Street, Christchurch

Membership

Chairperson	Mayor Phil Mauger
Deputy Chairperson	Deputy Mayor Pauline Cotter
Members	Councillor Kelly Barber
	Councillor Melanie Coker
	Councillor Celeste Donovan
	Councillor Tyrone Fields
	Councillor James Gough
	Councillor Tyla Harrison-Hunt
	Councillor Victoria Henstock
	Councillor Yani Johanson
	Councillor Aaron Keown
	Councillor Sam MacDonald
	Councillor Jake McLellan
	Councillor Andrei Moore
	Councillor Mark Peters
	Councillor Tim Scandrett
	Councillor Sara Templeton

5 September 2023

Principal Advisor

Dawn Baxendale

Chief Executive

Tel: 941 8999

Katie Matheis

Team Leader Hearings & Committee Support

941 5643

katie.matheis@ccc.govt.nz

www.ccc.govt.nz

Note: The reports contained within this agenda are for consideration and should not be construed as Council policy unless and until adopted. If you require further information relating to any reports, please contact the person named on the report.

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30. Resolution to Include Supplementary Reports Te Whakataunga Whakauru Pūrongo āpiti

1. Background Te Horopaki

- 1.1 Approval is sought to submit the following report to the Council meeting on 06 September 2023:
 33. Council submission on the Draft Government Policy Statement on land transport 2024
- 1.2 The reason, in terms of section 46A(7) of the Local Government Official Information and Meetings Act 1987, why the report was not included on the main agenda is that it was not available at the time the agenda was prepared.
- 1.3 It is appropriate that the Council receive the report at the current meeting.

2. Recommendation Te Tūtohu

- 2.1 That the report be received and considered at the Council meeting on 06 September 2023.
 33. Council submission on the Draft Government Policy Statement on land transport 2024

33. Council submission on the Draft Government Policy Statement on land transport 2024

Reference / Te Tohutoro: 23/1319901

Report of / Te Pou Jane Cameron, Team Leader Strategic Transport,
Matua: Jane.Cameron@ccc.govt.nz

Senior Manager / John Higgins, Head of Planning & Consents
Pouwhakarae: (John.Higgins@ccc.govt.nz)

1. Purpose and Origin of Report Te Pūtake Pūrongo

- 1.1 The purpose of this report is to seek approval of the draft Council submission on the draft Government Policy Statement on land transport 2024.
- 1.2 This report also seeks agreement to delegate sign off of the final submission to select Councillor(s) prior to the submission deadline of 15 September 2023.
- 1.3 The decisions in this report are of medium significance in relation to the Christchurch City Council's Significance and Engagement Policy. The level of significance was determined by considering the significance of the Government Policy Statement in setting the direction and the funding parameters for regional and local transport planning. This impacts a broad range of communities across the city and has wide-ranging social, cultural and environmental impacts.

2. Officer Recommendations Ngā Tūtohu

That the Council:

1. Delegates authority to [insert names] to approve any further changes to the draft submission
2. Approves lodging the draft submission (Attachment A) on the Government Policy Statement on land transport 2024 to Te Manatū Waka - Ministry of Transport

3. Reason for Report Recommendations Ngā Take mō te Whakatau

- 3.1 The [Draft Government Policy Statement on land transport 2024](#) (GPS) was released by Te Manatū Waka (Ministry of Transport) on 17 August 2023. Consultation closes on 15 September 2023.
- 3.2 The GPS is significant as it sets out the Government's priorities for investment in land transport over the next ten years. In turn it guides the Council's decisions on transport investment.
- 3.3 The GPS outlines the Strategic Priorities that are to guide investment, and then directs funding to activities that will deliver on these priority areas. It is also an opportunity for the Minister of Transport to set out their expectations for how Waka Kotahi is to give effect to the GPS.
- 3.4 The Government reviews the GPS every three years, and this is an important opportunity for the Council to have its say in whether the Government priorities are aligned with our own strategic priorities and long-term transport planning.

4. Alternative Options Considered Ētahi atu Kōwhiringa

- 4.1 The alternative option would be to not submit on the draft GPS.

- 4.2 This course of action is not recommended due to the significance of the GPS in setting the direction for our transport planning, and prescribing funding. It is therefore important to ensure that government priorities are aligned with our own; through a submission we can seek to influence this.

5. Detail Te Whakamahuki

Overview of the draft GPS

- 5.1 The draft GPS sets out the strategic priorities for the land transport system over the next 10 years. These priorities, along with their primary objectives, are:
- Maintaining and operating the system - the condition of the existing transport system is efficiently maintained at a level that meets the current and future needs of users
 - Increasing resilience – the transport system is better able to cope with natural and anthropogenic hazards
 - Reducing emissions – transitioning to a lower carbon transport system
 - Safety – transport is made substantially safer for all
 - Sustainable urban and regional development – people can readily and reliably access social, cultural, and economic opportunities through a variety of transport options: focus on increasing housing supply, choice and affordability, and developing resilient and productive towns and cities through effective transport networks
 - Integrated freight system – well-designed and operated transport corridors and hubs
- 5.2 There are several key differences evident in the draft GPS, compared with the GPS 2021. There is a greater focus on maintaining the system (as evidenced by the new Strategic Priority); and there is an increased emphasis on resilience, which is now its own discrete Strategic Priority, and which benefits from an increase in investment. This change is largely in response to recent North Island weather events and their effect on transport networks, and reinforced by the other Strategic Priorities. Sustainable urban and regional development is also a new priority.
- 5.3 The Minister’s expectations for the implementation of the GPS focus on achieving value for money and ‘building back better’. The latter is a new focus and will mean that Waka Kotahi and local authorities are able to focus on upgrading rather than just replacing like for like, thereby improving resilience of the infrastructure and the system.
- 5.4 The draft GPS proposes that small, staged increases to fuel taxes over the first three years of the strategy contribute to increasing National Land Transport Fund (NLTF) revenue, as well as road user charges. Crown funding and financing would make up the rest of the proposed funding package. This includes the \$6 billion the government has committed to the National Resilience Fund – of which transport investments will receive a share.
- 5.5 The activity classes that benefit from the greatest increases in proposed funding, compared to the 2021 GPS, are state highway improvements and maintenance; local roads improvements and maintenance; public transport; and walking and cycling improvements.

Summary of submission content

- 5.6 The submission supports the overall direction of the draft GPS and particularly welcomes the focus on maintenance, ‘building back better’, and resilience – noting that these challenges are particularly prominent for our city and region. However, the submission seeks greater focus on Christchurch and the Canterbury region, highlighting the underrepresentation in the named strategic investment programme and the wider strategic narrative.

- 5.7 The following details key points outlined in the Council's draft submission (Attachment A):
- 5.7.1 Strategic Priorities: the submission supports the six Strategic Priorities of the draft GPS; in particular the addition of 'maintaining and operating the system', and the new configuration of 'climate change' into 'increasing resilience' and 'reducing emissions'. The priorities demonstrate strong alignment with the Council's strategic priorities and our indicative long term plan priorities, including the issues identified as part of the development of the draft Infrastructure Strategy 2024.
 - 5.7.2 Greater Christchurch Mass Rapid Transit and Public Transport Futures: the submission seeks that the Greater Christchurch Public Transport Futures and Mass Rapid Transit projects are elevated within the draft GPS to reflect the regional and national importance of these projects, and how far they are already progressed. The GPS does not accurately reflect the criticality of these projects to achieving a more compact urban form and reducing transport emissions in Greater Christchurch.
 - 5.7.3 Maintenance and 'building back better': the submission voices strong support for this principle, which will enable the Council's planning teams to focus on what is best for the future of our transport infrastructure and services, rather than on maintaining it exactly as is.
 - 5.7.4 Funding increases: the submission supports the increased funding and investment package outlined, noting it is a necessity to maintain the condition of the network. However, caution is expressed around how much extra funding is available due to inflationary pressures. While the budgets appear to have increased substantially, inflationary pressures will nullify a considerable proportion of this. Any funding increase must be viewed in this context.

6. Policy Framework Implications Ngā Hiraunga ā- Kaupapa here

Strategic Alignment Te Rautaki Tīaroaro

- 6.1 The decision to submit on the draft GPS aligns with the Council's strategic framework.
- 6.2 The Strategic Priorities outlined in the draft GPS are well aligned with the Council's strategic framework, particularly with the focus on being an inclusive and equitable city, reducing emissions, and investing in adaptation and resilience. The draft submission highlights the importance of transport funding managing ratepayers' (as well as taxpayers') money wisely and planning for the wellbeing of both today's residents and future generations.
- 6.3 This report does not support the [Council's Long Term Plan \(2021 - 2031\)](#).

Policy Consistency Te Whai Kaupapa here

- 6.4 The decision is consistent with Council's Plans and Policies.

Impact on Mana Whenua Ngā Whai Take Mana Whenua

- 6.5 The decision to lodge a council submission on the draft GPS is not a significant decision in relation to ancestral land or a body of water or other elements of intrinsic value, therefore this decision does not specifically impact Mana Whenua, their culture and traditions.
- 6.6 The decision involves a matter of interest to Mana Whenua, however the decision to submit on the draft GPS will not impact on our agreed partnership priorities with Ngā Papatipu Rūnanga.
- 6.7 The draft GPS reiterates the Crown's commitment and responsibility to engage with Māori and to consider Māori outcomes. This commitment is expressed through the Ministry of Transport's strategy, Hei Arataki, and Waka Kotahi's Māori Strategy: Te Ara Kotahi/Our Māori

Strategy. The draft GPS is focused on ensuring that Māori aspirations are better reflected strategically.

Climate Change Impact Considerations Ngā Whai Whakaaro mā te Āhuarangi

- 6.8 The decision to lodge a council submission does not have any direct climate change impacts.
- 6.9 However, the draft GPS itself will contribute to emissions reduction and adaptation to the effects of climate change, through giving effect to its Strategic Priorities of increasing resilience and reducing emissions. The Strategic Priorities work together to underpin the importance of a resilient and lower carbon transport system.

Accessibility Considerations Ngā Whai Whakaaro mā te Hunga Hauā

- 6.10 There are no direct accessibility considerations associated with the decision to submit on the draft GPS.

7. Resource Implications Ngā Hīraunga Rauemi

Capex/Opex Ngā Utu Whakahaere

- 7.1 Cost to Implement - the cost of making this submission will be met from existing operational budgets. The costs involved in implementing transport planning priorities as a result of the direction set by the GPS, will be determined through long term planning processes.
- 7.2 Maintenance/Ongoing costs – as above
- 7.3 Funding Source – existing operational budgets.

8. Legal Implications Ngā Hīraunga ā-Ture

Statutory power to undertake proposals in the report Te Manatū Whakahaere Kaupapa

- 8.1 The opportunity to lodge a submission on the draft GPS is open to any person or organisation.



Other Legal Implications Ētahi atu Hīraunga-ā-Ture

- 8.2 There is no legal context, issue, or implication relevant to this decision. The Legal Services team will provide a review of the submission before it is finalised.

9. Risk Management Implications Ngā Hīraunga Tūraru

- 9.1 The decision to lodge a council submission is of low risk.

Attachments Ngā Tāpirihanga

No.	Title	Reference	Page
A  	GPS land transport CCC draft submission	23/1404229	10

In addition to the attached documents, the following background information is available:

Document Name – Location / File Link
Not applicable

Confirmation of Statutory Compliance Te Whakatūrutanga ā-Ture

Compliance with Statutory Decision-making Requirements (ss 76 - 81 Local Government Act 2002).

(a) This report contains:

- (i) sufficient information about all reasonably practicable options identified and assessed in terms of their advantages and disadvantages; and
- (ii) adequate consideration of the views and preferences of affected and interested persons bearing in mind any proposed or previous community engagement.

(b) The information reflects the level of significance of the matters covered by the report, as determined in accordance with the Council's significance and engagement policy.

Signatories Ngā Kaiwaitohu

Authors	Katie McFadden - Senior Policy Analyst Jane Cameron - Team Leader Transport
Approved By	John Higgins - Head of Planning & Consents

15 September 2023

03 941 8999

53 Hereford Street
Christchurch 8013

PO Box 73013
Christchurch 8154

ccc.govt.nz

Ministry of Transport
3 Queens Wharf
Wellington 6011

Email: GPS@transport.govt.nz

Christchurch City Council submission on the draft Government Policy Statement on land transport 2024

Introduction

1. Christchurch City Council (the Council) thanks the Ministry of Transport for the opportunity to provide comment on the draft Government Policy Statement on land transport 2024/Te Tauākī Kaupapa Here a te Kāwanatanga mō ngā waka whenua.
2. The Council supports the overall direction of the draft Government Policy Statement and particularly welcomes the focus on maintenance, 'building back better', and resilience. These challenges are all particularly prominent for our city and region. We would welcome a greater focus on Christchurch and the wider Canterbury region, which is not well represented in the investment programme or the wider strategic narrative. Christchurch is the second most populous urban area in the country, and the GPS needs to reflect its national importance.

Submission

Strategic Priorities

3. The Council supports the six strategic priorities outlined in the draft GPS; in particular the addition of 'maintaining and operating the system', and the new configuration of 'climate change' into 'increasing resilience' and 'reducing emissions'. The priorities demonstrate strong alignment with the Council's strategic priorities and indicative long term plan priorities, including a focus on renewals, resilience, and emissions reduction. They also support our current programmes of work, such as the Major Cycle Routes, improving our public transport system and the Pages Road Bridge.
4. We note that the priorities work together to promote a transport system that provides for the needs of current and future generations, and we support the prioritisation of interventions that deliver benefits across multiple objectives to achieve this.
5. Maintenance of our current assets is a big concern and focus for the Council, and for the wider region. The Council strongly supports the addition of this strategic priority and the focus on maintenance throughout the document. We note that there is increasing international recognition that maintaining what we have is more worthwhile than building new infrastructure, in the long term.

6. The Council also strongly supports the focus on resilience and reducing emissions; we agree that the strategic priorities work together to reinforce this priority and we echo the call for urgency in addressing these priorities. The Council submits that the current lengthy business case analysis process can present delays to implementing initiatives to build resilience and reduce emissions. We hope that the 'build back better' principle will help to introduce more flexibility and provide greater scope for councils to be able to expedite projects that achieve these priorities.
7. We support the priority to increase the resilience of our roading network – this is a priority across Christchurch and especially on Banks Peninsula, where heavy rain events have caused slips and flooding leading to road closures, and where sea-level rise will have a large impact over the coming years.
8. The sustainable urban and regional development priority supports the Council's planning for 'walkable catchments'. This focuses on providing better travel options for households to access work, education, and necessary services, within a 15-minute travel time and without having to rely on private vehicles. This in turn will contribute to reducing emissions. It is encouraging to see mention of well-functioning urban environments and the specific link with supporting higher-density development along well-connected transport corridors and in town centres.
9. This priority is supported by the investment intervention hierarchy, which suggests considering integrated transport and land use planning ahead of other, more costly, interventions - to maximise the use of the existing network, reduce travel demand, and support greater travel choice. These concerns are at the fore for Christchurch and Greater Christchurch, with the draft Greater Christchurch Spatial Plan scheduled to be considered for adoption by Partner Councils in early 2024. The draft Plan provides a blueprint for how population and business growth will be accommodated in Greater Christchurch into the future, through targeted intensification in centres and along public transport corridors.
10. The Council supports an integrated freight system, the implementation of which is supported by the One Network Framework. We look forward to continuing to put this priority into practice through our regional land transport planning.

Strategic Investment Programme

11. The Council requests that the Greater Christchurch Public Transport Futures and Mass Rapid Transit projects are elevated within the draft GPS into the Strategic Investment Programme to reflect the regional and national importance of these projects, and how far they are already progressed. We note that the Mass Rapid Transit indicative business case for Greater Christchurch has been completed. It already has an agreed route, a positive cost-benefit analysis, and the agreement of all partners to progress it to the detailed business case stage. There has also been a community engagement process through which positive community support for the project has been demonstrated.
12. The GPS does not accurately reflect the criticality of these projects to achieving a more compact urban form and reducing transport emissions, in Greater Christchurch. Mass Rapid Transit would have equal impact for the sub-region as the City Rail Link and North-West Rapid Transit projects will for Auckland or Let's Get Wellington Moving for Wellington.
13. We also have a narrowing window of opportunity to deliver Mass Rapid Transit in Greater Christchurch at a cost that is net positive for government. This requires the commitment of all partners to progress it with some urgency.
14. In addition to capital funding for public transport, the Council also needs to work with Environment Canterbury to invest in an uplift in public transport services to match.

15. The Council notes that the majority of projects in the Strategic Investment Programme are focused on state highway expansion, and we would like to see the programme better reflect the full suite of stated priorities. Continued investment in infrastructure that encourages reliance of private vehicle travel over long distances directly contradicts the goals of 'improving access, affordability, community connectivity and environmental outcomes' and 'more efficient land use and resource use', by encouraging urban sprawl over productive land.

Funding increases

16. Overall the Council supports increased funding, and the investment package outlined. It is not only welcome but absolutely necessary to maintain the condition of the network.
17. However, the Council is cautious in its approach to the apparent funding increases, due to the inflationary pressures of the last few years. Accounting for an average cost increase of around 30 percent, the actual increases are not great and while the sums of money themselves may have increased, this does not necessarily mean that purchasing power has also risen. The Council is needing to spend exponentially more on its infrastructure in order to simply maintain its assets to the same level, and any funding increase must be viewed in this context.
18. We also note that despite the overall increase in funding, there may not be much that is additional. For example, \$18.4 billion of the projected \$20.8 billion of NLTF funding over the next three years, has already been allocated to 'essential expenditure'. This 'essential expenditure' includes maintenance needs, operating expenses, and existing commitments such as public transport subsidies, projects under construction, and debt repayment. This leaves only \$2.4 billion (a yearly average of \$800 million) to cover all new nationwide expenses. Moreover, this projected funding assumes that Waka Kotahi will secure a Crown loan of \$3.1 billion, which is not guaranteed.
19. It also appears that most of the direct Crown funding referenced in the document is already committed, with around \$200 million remaining as contestable by local councils. Similarly, the national resilience fund is \$120 million contestable – a small proportion of the total amount.
20. In addition to these funding constraints, the capacity of the sector to deliver on government expectations will remain an issue, as will the funding levers available to local government.
21. The Council notes that there is no mention of the expiration of the Road User Charge exemption on zero emissions vehicles in the context of NLTF revenue. Over half of new vehicle sales in New Zealand in July 2023 were EV or hybrid vehicles and our revenue system needs to change in line with this. If change does not occur, the shift in the composition of the national vehicle fleet will serve to lower revenues as the conversion speeds up. We suggest that the Future of the Transport Revenue System review is progressed with urgency, in order to address this issue. The Council supports the hypothecation of traffic infringement fee revenue to the NLTF to support safety investments.

Funding for Activity Classes

22. We note that the reallocation of safety funding to the state highway and local road improvements activity classes is likely to provide for greater flexibility for the Council to direct funding to where it is most needed and we welcome this. However, the Council has concerns that this approach may have unintended consequences by reducing the focus on safety improvements. It could risk those projects whose main value proposition/benefit is safety improvements, as these projects will have to compete with the full spectrum of improvement projects. It is unclear how this change would play out in practice, and the Council therefore suggests that the impact of the shift is monitored and reported on, to determine whether any unintended consequences are occurring.

23. The Council would also like clarification on whether the Standard Safety Intervention pathway will still exist for projects, under the new funding model.
24. We strongly support the funding increases for the walking and cycling improvements activity class, noting the general comments outlined in paragraphs 17 and 18 also apply here.
25. As a general principle we also wish to ensure that projects resulting in outcomes across unrelated activity classes are allocated funding appropriately. For example, rail network resilience investment and cycling networks.
26. The Council supports increased funding for KiwiRail and coastal shipping; as far as possible we support efforts to move heavy traffic off the roads. We also support funding that will increase rail safety.

Ministerial expectations

27. The Council agrees that the traditional indicators of economic efficiency are not sufficient to improve value for money. We would be interested to see further explanation of the list of measures given for Waka Kotahi to monitor progress against the outcomes sought (Table 1), including what factors will be used. We emphasise that there are substantial health benefit calculations inherent in our transport planning, such as the positive health impact of improving air quality through the reduction of nitrous oxide emissions from petrol and diesel vehicles. We must be careful not to lose sight of these (and the many other co-benefits), or diminish their importance.
28. The Council strongly supports the principle of building back better. This will mean that the Council can be more flexible and tactical in its planning, focusing on what is best for the future of our transport infrastructure and services, rather than being constrained to build back like for like. This could facilitate the approval of hybrid improvement/maintenance projects, or ones with alternative treatments, and the Council welcomes this forward thinking.

Conclusion

29. The draft GPS has a strong focus on people and place – these are important themes that underpin all aspects of transport planning and will ensure that the transport system improves wellbeing and liveability for our communities.
30. The Council thanks the Ministry for the opportunity to submit on the draft GPS 2024. We consider the GPS to be a positive step forward for the land transport system in New Zealand. Overall, it represents a balanced and thoughtful approach to the challenges faced, and a greater focus than previously on the longer-term needs of our communities.

For any clarification on points within this submission please contact Jane Cameron, Team Leader Strategic Transport (Jane.Cameron@ccc.govt.nz).

Yours faithfully

Signed by either GM (staff submission) or the Mayor (Council submission)

Letter reference number or info
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