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**From:** Environment Canterbury  
**Sent:** Sunday, 25 February 2024 11:29 pm  
**To:**  
**Subject:** Regional Land Transport Plan submission

Anonymous User just submitted the survey 'Draft Regional Land Transport Plan submission' with the responses below.

**First name**

Cameron

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**Surname**

Matthews

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**Email address**

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**Are you giving feedback on behalf of an organisation?**

No

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**Select your local city or district council:**

Christchurch City Council

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**Tell us how important each of these objectives is to you:**

Maintenance	Not very important
Resilience	Important
Emissions	Very important
Growth	Important
Safety	Very important
Freight	Important

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**If you think we should consider other objectives, please describe what they are and why they should be considered:**

Economic return on investment - no blank cheques, there's an opportunity cost to everything (including road maintenance) - council should prioritise projects with good economic return and seek the means to sustainably finance those projects. Sustainable land use - regional transport is inter-related with urban development (particularly in smaller, growing communities) - ensure decisions made consider their impact on land-use. Mobility - mobility for person-transport is minimising the economic and financial costs for people to go places - if freight is a "goal", so-too should be the mobility of people within the region and connections beyond - we should be aiming to enable the movement of people at reduced economic cost, including reduced emissions (considering existing and potential modes (i.e. air, road, rail, active) and regional plus inter-regional travel demands).

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**Target 1: 40% reduction in deaths and serious injuries on Canterbury roads by 2030**

Good, but why not 100%? Nobody wants to die on the road, why do people have to again? Maybe we could give people options for regional mobility that aren't likely to kill them...

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**Target 2: 41% reduction in greenhouse gas emissions from land transport in Canterbury by 2035**

Good, but why limited to land transport? Rail could displace many of our regional air services with fewer emissions - include it. Ensure this is a gross reduction rather than just a normalised (eg. per-passenger-kilometre) reduction

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**Target 3: 100% increase in tonnage of freight moved by rail in Canterbury by 2034**

Happy days, but ensure the results of this investment don't preclude effective rail maintenance/renewals (i.e. long term sustainability of the rail network), nor come at the cost of developing a regional passenger rail service. Also ensure this effectively reduces the number of heavy trucks on urban roads, rather than is just an increase in freight volume across the board.

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**Tell us how important each of these priorities is to you:**

Create a well-maintained network	Important
Manage risk of exposure to extreme events	Important
Support and develop connected public and active transport networks	Very important
Implementing safer systems (Road to Zero)	Very important
Support and develop freight systems connecting to air, rail and sea	Important

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**Are there specific actions you think should be taken to help achieve these priorities?**



Yes, develop medium-speed regional/inter-regional rail services (particularly on the Christchurch-Dunedin route). These run on separate right-of-ways and use different infrastructure compared to roads, and so improve resilience for regional mobility (without having to completely duplicate the roading network). They move people faster than driving with more consistent journey times and so reduce road demand - reducing maintenance, reducing congestion, improving safety. They link smaller regional centres which don't have regular (or any) air services - improving accessibility and rural/urban amenity alike. They contribute to investment in the rail corridor, which has benefits for freight operations in the longer term. Most importantly the rail corridor and much of the fixed infrastructure exists and requires relatively little (compared to roading investments, for example) expenditure to begin operating these services. In addition, install road safety infrastructure such as median barriers, and close (for good or until fixed) hazardous intersections, which are rife in rural Canterbury.

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**Do you support investigating alternative approaches to fund transport system improvements?**

Yes

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**What sources of funding do you think could be used to pay for regionally significant improvements:**

Before we start, I should say that more roads does not equal 'significant improvement', quite the contrary. As for rail, we should use debt finance (be that via a special purpose vehicle or whatever means) to cover capex for A: marginal cost of expediting railway renewals, B: marginal cost of upgrades for medium speed (160k/hr) running, C: rolling stock acquisition. We (or the district/city councils) should use land-value capture for station purchase/development. Operations may be financed by charging reasonable fares for a good service, collected from the hundreds or even thousands of users per day that would benefit from, for example: halving their travel time between Christchurch and Timaru, saving an hour each way. On top of this, the improved mobility offered to connected centres by regional rail services increased the amenity of those centres and their local transport catchments. A targeted rate may be levied to help cover opex (including cost-of-capital)

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**Are these the right measures of success?**

No, these are not the right measures.

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**Are there other monitoring indicators or measures of success that you think should be included?**

"Annual proportion of vehicle kilometres travelled on 'smooth' sealed roads" is NOT equal to well-maintained! The ride quality is of nearly zero importance, the road-surface type (sealed or otherwise) is of near-zero importance. These PREFERENCES come at immense (like, basically the entire budget) cost, and are in service of no higher goal with actual tangible outcomes. The measures of success for a well-maintained network SHOULD be safety (DSI, near miss, or indicators like acute damage to vehicles) and uptime-reliability based. At present, this indicator is able to be gamed by RCA's going around spending all their money sealing rural roads or milling whole stretches of state highways to temporarily erase the ruts squashed into them by extra heavy trucks. This is frustrating since the nominal 'maintenance' objective is important, but the measure you're using isn't. "Number of unplanned disruptions to state highways" is NOT equal to managing the risk of exposure to extreme events. It is road-centric (not mode-agnostic) and therefore is blind to systemic improvements (like alternate mode provision), and is also blind to better management and provision of reactive solutions to extreme events. This is frustrating since the nominal 'maintenance' objective is important, but the measure you're using isn't. "SUPPORT AND DEVELOP CONNECTED PUBLIC TRANSPORT AND ACTIVE TRANSPORT NETWORKS", while good, is lacking any outcome measure for the 'connected' part, which could include initiatives like regional/inter-regional rail services. The measure of "Kilometres

of active transport network (walking and cycling)" is good, but should be in addition to some measure of utilisation, network provision, and/or viable alternative provision. Dozens of km's of rural motorway-adjacent cycleway is fine, but is far far less useful than dozens of km's of urban cycleways providing fast and safe alternatives to driving for common trips with urban population levels. The outcome measure should reflect that difference, especially given the relative difficulty for provision of the latter. "IMPLEMENTING SAFER SYSTEMS" That seems all good. "SUPPORT AND DEVELOP FREIGHT SYSTEMS CONNECTING TO AIR, RAIL AND SEA" That seems all good, though I'm not sure about increasing air freight volumes as a goal. That seems bad actually, from an emissions perspective. You really should include air (and sea) emissions in Target 2, since the planet doesn't care if your GHG emissions are land-based or otherwise. "TRANSPORT IMPACTS ON WELLBEING" That seems all good, though it'd be nice to include not just school and work commutes in the measure, but all trip types.

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**Would you like to speak to your submission at a hearing in March?**

No

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