

DRAFT CHRISTCHURCH TRANSPORT PLAN

COMMENTARY AND SUBMISSION

NEW ZEALAND AUTOMOBILE ASSOCIATION INCORPORATED

PRESENTATION:- Warren Masters (Chairman) Brian Palliser (Deputy Chairman)

1. AA BACKGROUND

As explained in previous submissions:-

The New Zealand Automobile Association has a large membership of over 1.3 million with some 81,240 members in Christchurch. The AA works cooperatively with the Government, Local Government, Regional Councils, the NZ Transport Association, the NZ Police, the road transport industry, Public Transport operators, other sector groups and the media to represent the interest of its members.

AA advocacy and policy work focuses mainly on protecting the freedom of choice and rights of motorists, including enhanced road safety and the safe and economic development of all transport networks. The AA concerns extend well beyond 'cars and roads' to include public transport, cycling and walking recognising the importance of these active modes which are enjoyed by all citizens.

The AA has been well represented at the City Council's workshops and previous submissions. We maintain a friendly and valued relationship with the many other organisations involved in transport and planning and in particular with City Councillors and Council officers.

In short the AA has in the past, and will continue in the future, to support the rational planning and design of the whole transportation system. It is particularly interested in the Draft Christchurch Transport Plan.

2. BASIS OF SUBMISSION

The AA position remains the same on the Draft Christchurch Transport Plan(CTP) as it was on the Christchurch Central City Plan.(CCP) where the AA view was stated as :-

' We need to ensure a vital city where people can move freely and safely by whatever mode of transfer they wish to use, including the motor car.'

Obviously with this background the AA now strongly supports the CTPs primary objective to:-

"Keep Christchurch Moving forward by providing transport choices to connect people and places"

The AA wishes to support the planning endeavours of all agencies involved in the redevelopment of Christchurch and the extension of activities in the surrounding council areas following the earthquakes.
Improved transportation networks are a vital social and economic element over the next 40years.

In order to inform its members and prepare these submissions the AA has undertaken a survey of its Christchurch members and commissioned two reports:-

Report A- Draft CCCP- 'Commentary on Central City Planning,Transport and Network Issues' Sept 2011

Report B- Draft CTP - 'Commentary on Wider Region Network Transportation Planning' August 2012

Report B was prepared following the release by the CCC Draft 'Christchurch Transportation Plan' on the 18 July 2012. It considers the wider suburban and regional network described in the CTP. Report A having addressed public transport, city centre parking, city centre streets and one way streets. Both reports are available and have been used as a basis for this submission to the CCC.

We realise the CCC and submitters are all in a situation where there is an evolving and 'rapidly changing target'. For this reason the submission includes comments on the three significant Plans which have been released since August 2011. The Draft CCCP- August 2011, The CERA/CCDU '100 day Blue Print' July 2012 as well as the Draft CTP July 2012.

In considering the Draft CTP we have grouped our submissions and commentary as follows:-

3. Key Issues Raised in AA Submissions on Draft Central City Plan (CCP) September 2011
4. City Council's Central City Plan December 2011
5. CERA/CCDU Recovery Plan - '100 Day Blue Print' July 2012
6. The Draft CTP 2012-42 July 2012, Significant Issues.
7. Conclusions

3. KEY ISSUES RAISED IN AA SUBMISSIONS ON DRAFT CENTRAL CITY PLAN (CCP) SEPTEMBER 2011.

The AA generally supported the Central City Plan's opportunities for open spaces, increased landscape amenity, pedestrian convenience, improved cycleways and cycle access, a central bus interchange, the creation of boulevards and slower traffic streets. The AA agree that the *'Central City (should) be easier to get to and get around'* and this must include convenience for all modes, including motor vehicles. The Draft Plan cautioned that the *'traffic, public transport and parking demand modeling and analysis'* has yet to be undertaken and reported. The AA assumed the road network in the Draft Plan was an initial outline plan only.

In its September 2011 submission the AA also included information drawn from its own survey of 4767 Christchurch members. These showed the proportions of members who used alternative modes of travel regularly, the frequency and purpose of visits to the central city and to other shopping centres, etc.

The AA had serious reservations relating to the Transportation Choices statement in the draft CCCP. In particular the repeated emphasis on improved solutions for the minor modes (walk, cycle, bus), which together represent only 20% of all person trips to the CBD, and the relative disregard for the needs of the 60 % of trips as car drivers plus the 20% car passenger trips for the Central City to be a viable and economic success. The AA opposed the proposed fixed light rail as being both inappropriate and uneconomic.

The AA concluded that the following matters had not been developed sufficiently in the Draft Plan and required more detailed analysis and testing prior to their approval and adoption:-

- the advantages of the retention of the one-way street system.
- the details of the centre city street hierarchy and the access road network.
- the retention of the Durham St vehicle bridge for all traffic.
- the public transport bus central city network and the central Bus Interchange.
- the improvement of the public bus transport system and the use of electric and hybrid buses.
- the planning for courier and trade vehicle access to the central core developments.
- the plan for future central city car parking buildings and parking lot locations and management.
- the rejection of the light (fixed) rail suburban public transport proposal.

4. CITY COUNCIL'S CENTRAL CITY PLAN DECEMBER 2011

The AA had stressed that the City Council, as advocates for the land use and plan changes, the road network changes and the public transport changes, must undertake the studies and present reports and evidence that leaves no doubt as to the wisdom, the feasibility and the economics of their proposals.

However the CCC ignored the AA submission on the need for more transportation studies. Some minor amendments were made to the networks. The Council adopted the draft Plan, which was forwarded to the Minister in December 2011.

The AA submission identified the value, the environmental benefits, the merit and wisdom of retaining the one way streets as the best and most even manner of enabling traffic to gain access around the periphery of the central core.

The CCC, in its decisions arising from the October 2011 hearings, appears to have rejected the technical merits, safety and environmental advantages of the one way streets. In spite of their undoubted success the Council resolved to continue its (political) policy of switching all central city one way streets back to two way distributor streets.

The AA submission questioned and opposed the suggestion of introducing fixed light rail public transport between the suburbs and the central city. In particular the doubtful economics of the University to CBD line. The AA supports a flexible improved rubber tired inter suburban PT system with electric and hybrid motors .

The CCC retained the possibility of undertaking further studies for a light (fixed) rail suburban public transport system .

The AA requires more information and evidence from integrated transportation studies for the classifying of inner city street networks. The changes should not be at the expense of the convenience to goods, courier and private vehicle gaining access to the new pattern of land uses and must include suitable parking buildings/lots that conveniently serve the city centre.

The CCC seemx to have ignored these substantial submissions which were seeking an integrated assessment of trip making on the cycle networks, bus networks, road networks and for the major parking locations in the city centre.

The AA sought that the City Council, the Regional Council, NZTA and CERA must insist on factually based, technical transport planning analysis and economic assessments so as to provide reliable evidence for the significant changes to the networks and the consequent amendments to the transportation section of the existing City Plan (2005).

The CCC has not undertaken any further transport studies. However both CERA and NZTA have indicated they are committed to the recovery and are apparently undertaking their own transportation studies.

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5. CERA/CCDU RECOVERY PLAN - '100 DAY BLUE PRINT'- JULY 2012

The forwarding to Government of the City Council Draft Central City Plan in December 2011 was followed by the Minister and CERA establishing the Christchurch Central Development Unit (CCDU) and appointing Boffa Miskell and associated consultants to produce the 'Christchurch Central Recovery Plan' known as the '100 day Blue Print'. This alternative plan was released on 30 July 2012.

CERA/CCDU in their '100 day blue print' , have firmly supported a range of anchor projects. In addition they have introduced the principle of a lower density open 'frame' around three sides of the city centre core.

Regarding Accessibility:-

CERA/CCDU have repeated the 'soft words' about the redevelopment being a 'significant opportunity to address accessibility'. This assumes all modes have their contribution. However in this first 'blueprint' the only two aspects receiving special reference is the location of the bus interchange and the provision of a new network of continuous and safe cycle routes. The AA agrees the location of the bus interchange but note that all the other modes and parking locations also require appropriate attention.

Testing of Network:-

The CERA/CCDU 'Blue Print' is silent on the central city road network and one way streets noting that *'Further transport modeling will be undertaken before changes are made to the road network within the central city'*. It now appears that detailed assessments based on sound transportation modelling will be undertaken (possibly by the CCDU) before the changes are proposed to the street networks, the bus routes and the parking provisions for the city centre. The **AA** strongly endorses the need for such traffic studies.

One Ways and Avenues:-

The 'Blue Print' is not explicit, at this stage, about the future functions and form of these key traffic distributor streets. All are shown well planted with avenues of trees (Ref pp 33) and their future will be determined after suitable traffic and environmental studies. Apart from the recently and fashionable 'dead set' against the one way streets by some architects and two Mayors, there is no real evidence of conflict and in fact the one way streets greatly assist the objectives enunciated in the Recovery Plan. The one ways are an elegant edge distributing traffic around the outside of the central core and readily form part of the street system in the 'Frame'. As for upgrading the four Avenues, to take even more traffic than in the past, that does not appear to be in the community, the residential frontages, the safety or the transport solutions interests.

The **AA** believes these streets have been heavily trafficked in the past and will again be critically loaded in the future. While accepting they must be made more attractive in visual and landscape terms and that their traffic should be managed within a traffic cap in the future, they are a unique combination of major vehicle streets that operate successfully and which should be retained.

Regarding parking:-

The 'Blue Print' states *'Parking will be managed to support and complement activities, land use and transport networks.'* But no plan or detail as to the quantity or location of parking for the whole central city is included. This is in spite of submissions made in September 2011 seeking much more analysis and study for these transportation aspects before the new road networks are adopted.

The **AA** believes that as with the network recovery and improvements, so also the parking must be seen as a priority 'anchor project' and should be subject to traffic modelling and also integrated transport assessment.

Health Precinct Oxford Tce:-

The 'Blue Print' has assumed the closure of this length of Oxford Tce frontage to the Avon so that presumably all east-bound traffic from Riccarton and Hagley Avenues will travel along Tuam St. While not being ideal as the one way east-bound street, this has previously (2002) been shown to work reasonably well, with St Asaph St remaining the parallel west-bound one way.

The **AA** believes this would be a satisfactory arrangement along the southern edge of the central city core.

Bus Public Transport:-

The CERA/CCDU 'Blue Print' has generally confirmed the arrangements with a suitable central interchange site being located on the east of Colombo St between Lichfield and Tuam Streets. The bus interchange is deemed an early 'anchor project'. The central city set of principal bus routes making use of Manchester St and Durham St is now being tested and refined in cooperation with ECAN.

The **AA** believes this Interchange location is the best and accepts that Lichfield St will need to be a two way bus route, with other traffic taking second priority.

No Light Rail :-

The CERA/CCDU 'Blue print' for the city centre has not included or suggested the possibility of rail or light rail within the city centre or the Christchurch suburban area.

The **AA** hopes that there will be no further resources wasted, at this time, to undertake any further studies of any future light rail system for suburban Christchurch. The proposed central city Heritage Tram extensions are acceptable but it is not seen as carrying large daily passenger or commuter loads.

6. THE DRAFT CHRISTCHURCH TRANSPORT PLAN 2012-42 (CTP) SIGNIFICANT ISSUES.

- a) The AA supports the City Council and its partners in its desire to develop a comprehensive Transport Plan for the whole of the metropolitan region. This draft CTP of 18 July 2012 is a further step along this journey. We are aware that CERA and NZTA are undertaking a parallel Greater Christchurch Transport Statement

Comment - The CTP appears to be an interim plan which is not yet covering the whole metropolitan region and, with its present content, may not be fully supported (in all respects) by all the partners involved.

- b) The objectives and policies now proposed in this Draft Plan are very similar to the higher level objectives of the 2005 City Plan, which had previously been through full consultation, submission and approval processes under the RMA. The general purposes of the CTP are easy to write down and easy to read but the 'devil is in the detail'. Some detail is contained in the limited Appendices and some is foreshadowed to come later.

Comment - There is no review of the strengths and weaknesses of the present road network or the information and policies of the transportation sections of the existing City Plan. The City Plan includes policies and rules related to the use and development of the existing roads which all fall in the City Plan's 'road zones'.

- c) This Draft CTP is a statement of intent and high level objectives. However, in the absence of key performance indicators and levels of service policies, it seems to be a wish list including some things which are questionable, (e.g. light rail, street closures and a network of segregated cycle routes), but which the Council might like to do.

Comment - This draft plan suffers from a lack of objective performance measures and standards or levels of service and policies to be implemented and achieved in the future network. The Plan has not identified any changes in policy or direction, compared with previous transport planning and programmes, so it is difficult to grasp the scale of changes proposed.

- d) The absence of satisfactory transportation studies, technical analysis and with no network deficiency analysis together with no serious consideration of likely future change in trip making by different modes, are all weaknesses in this draft Plan.

Comment - Deficiency assessments, traffic surveys and transportation studies must all be undertaken, analysed and made available before the mix of networks and improvements are proposed and then agreed.

- e) The street classification proposals are unique and complicated. This classification should be aligned more closely with the recently developing national road network classifications.

Comment - The existing City Plan provisions may not require to be greatly changed to achieve the purposes espoused in the CTP. Some of the name changes appear to be window dressing and not material. Nationally a 'link' and 'place' definition is currently being agreed. It should be possible to reconcile the two systems.

- f) The Plan does not include individual estimates for the major projects and programmes. The inclusion of a list of the major new capital works together with some economic assessments of their benefits would give a clearer view of the scale of improvements recommended. The grouping of all the activities together under the four outcome 'goals' (1 Access & choice, 2 Safe liveable, 3 Economic vitality, 4 Environment) is interesting but not easy to follow as every transportation enhancement must contribute to all four goals.

Comment - For a 30 year period when the costs of repairs, reconstruction and new additions to the roading and transportation system are several times larger than at any time in the past, (and when so many other demands also exist on Council funds), it would be helpful to have an economic

assessment of the likely transportation maintenance and capital funding for the significant programmes selected in the Plan.

- g) The Draft CTP includes the statement that 'Transport projects include; public transport investigations; bus and street stations; slow core; main streets; cycling streets; enhancing the avenues; one-way to two-way; parking servicing; and wayfinding.'

Comment - The inclusion of:

- a) the public transport element may ignore the role of ECAN as the agency planning for the region's Public Transport
- b) The conversion of one-way to two-way streets reflects a 'political fixation for the change and is premature'.

- h) Inspection of the CERA/CCDU '100 day blue print' for the City Centre Recovery Plan shows that the central city Bus Interchange has been selected as an anchor project and sited east of Colombo St and between Tuam and Lichfield.

Comment:

The Lichfield/Tuam site for the central city Bus Interchange and its selection as an anchor project is appropriate and seems good decision at this early stage

- i) The City Council's CTP still retains a lingering desire for the further investigation of the feasibility for a fixed rail public transport system to serve the suburban areas of Christchurch and link into the city centre.

Comment:

Fixed rail PT, even as light rail, is not appropriate in the Christchurch situation. The technical and economic justification for such a high capital cost solution is seriously questioned.

Inspection of the CCDU 'Blue print' confirms that Light Rail PT has not been included in the Recovery Plan.

It is suggested that the PT focus is best placed on bus transport with flexible routing and the introduction of electric and hybrid power solutions.

- j) Parking is vital for access and therefore the viability of the future Central City. There is little discussion, beyond street parking, in the Plan. There are no estimates of likely demand for street and off street parking or of the split between short and long term parking. There is no indication as to the future policies on parking building and parking lot locations in the central city or the 'frame' and peripheral areas.

Comment:

The analysis and projection of parking demand and its provision from private and public funds is essential. Provision of parking at strategic fringe locations, including buildings and attractive parking lots should be treated as an anchor project with early determination of the location and land needs.

- k) The explicit recognition of strategic routes and freight routes are to be commended. However in the CTP they seem to mostly relate to the SHs and roads of national significance, there are also many other regional routes that should be included.

Comment

Many existing routes of regional significance as both freight and strategic routes (e.g. Airport and Port to CBD, Cranford/Sherbourne St, Harewood Rd, Evans Pass and others) which should also be included. The freight route by-pass on the west of the airport is a new feature which is questioned and needs to be justified.

- I) The emphasis on the cycle mode of travel and development of cycle routes may be opportune.
This need has been studied and met in varying ways in the past and, provided it does not detract materially from the street capacity at critical locations, this may be the right time for these cycle projects.

Comment:

The favouring of the cycle facilities, segregation, ways and lanes must be tempered with the needs of other road users and done in a manner which is safe to all users. The selection and development of segregated recreational and tourist cycle routes would, of course, meet all the goals with a safer and more attractive environment (subject to the overarching budgetary restraints).

7. CONCLUSIONS

The **AA** commends the City Council in its endeavour to describe the issues and establish a comprehensive suite of transport policies for Christchurch City. We agree this process is essential to the longer term recovery and planning for the Christchurch urban area. This Draft Christchurch Transport Plan is another step along the way.

It appears to the **AA** that:-

1. **This Plan is a broad description** of Christchurch's transportation issues and possible initiatives that the City Council would like to see taken to further develop the main urban area. It has drawn many of its concepts from the 'Share an idea' consultations and echoes the general conclusions of the public relations and sector opinions articulated in that process. Most of the programme of improvements relate to existing and well defined issues. The 'CTP' is seen as a 'high level' council policy document.
2. **A higher quality urban environment** is described and the CTP illustrates how this can be achieved through improved networks. This relates particularly to facilities for the active modes of cycling, public transport, walking and also the creation of more tree lined and landscaped streets. There is a recognition of the need to identify and manage the strategic highways and arterial routes and develop a basic freight road network. However the Plan has not identified existing network deficiencies based on any transportation performance standards.
3. **The identified projects** are derived from past experience and capital programmes prepared for the UDS and Council's LTCCP and the NZTA/LTPs. WE understand there has been no new household transportation survey, land use, transportation, or economic studies undertaken to test the merits of the total package or the priorities of particular proposals. Most of the projects are extensions and refinements of the existing spectrum of modes of travel and the need for well established road network improvements. While the CTP includes a general discussion on the City Council's funding options there is no specific information on the major project costs or on how all the proposals will be funded in the short, medium and longer term programmes.

In Section 6 of this submission the **AA** has outlined a dozen specific matters where we would wish to have discussions and seek further information as part of future studies and progress on selected projects.

The **AA** concludes that this document is a useful 'high level' public policy statement. The supporting technical studies are still in progress and these will enable refinements and greater confidence in the networks proposed, the economic benefits derived and the future timing of the improvement programmes and projects.

The **AA suggests to the City Council** that this Draft Christchurch Transport Plan should be refined by the Christchurch City Council taking advantage of this present round of consultation. Then it can be 're-branded' as an 'Interim Policy Statement' and used to advantage as a reference for defining further policy and project studies in the evolution of the next generation of Regional, City, District, NZTA and CERA Plans. These Plans are all required by legislation (e.g LG Act, RM Act, LTM Act, CERA Act).

This 'Interim Policy Statement' would provide a good basis for more specific policy documents reflecting agreements between all the agencies in their future joint activities in transportation for this region.

The **AA** thanks the Christchurch City Council for the opportunity to consider and make submissions on the Draft CTP.

Warren Masters
District Chairman

23 August 2012