



7 October 2004

Draft Canterbury Regional Land Transport Strategy 2005 - 2015

Spokes Canterbury welcomes the opportunity to comment on the draft RLTS. Spokes has been very supportive of Environment Canterbury's recent initiatives to promote cycling (and transport alternatives in general) in the region. However ECan can only do so much itself, and therefore the RLTS needs to strongly set the tenor (and indeed, legislative mandate) for the constituent local councils and Transit NZ, so that they are equally as supportive in this regard.

Spokes Canterbury is concerned to see the June 2002 RLTS largely repeated in the current document. The purpose of the Land Transport Management Act 2003 is "to contribute to the aim of achieving an integrated, safe, responsive, and sustainable land transport system". In our view, this should be the framework on which the RLTS is based.

The eight RLTS Key Result Areas (equitable access, thriving economy, social environment, etc, developed in 1999 – see p16) are well past their "use by" date and should be retired in favour of the aims of the new legislation.

We would like to see specific treatment of each of these four aims – integrated, safe, responsive, and sustainable. The current document is long on rhetoric (over 150 pages) and short on specifics.

On a positive note, we are pleased to see an expanded section on demand management.

We note that throughout the document references to "LTSA", "Transfund", "Safety Administration Programme", etc will need to be amended to reflect the new organisational landscape from 2005 when this Strategy becomes active.

Trends and Issues (p1)

We take issue with the second bullet point, which implies that only improvements to the transport network (i.e. supply) can alleviate congestion, and not reduction of demand; clearly the latter is a more sustainable long-term solution. This section also needs to be clear that it is *motor vehicle* congestion that is a concern; all other transport modes are fine.

Vision (p2)

"The best possible quality of life" is too general and does not force us to think of our intergenerational responsibilities, as for example in the Brundtland Commission definition of Sustainable Development: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs".

Monitoring (p4)

Given that the Strategy is to be renewed every three years, why not include some targets for 2008 as well? Six years seems a long time before checking whether adequate progress is being made. Also, why are 1996 Census figures quoted when more recent 2001 data are available?

Strategy options (p6)

Include a legend for the chart on page 7. Our concern is that the desire for Strategy D will continue to not be reflected in the transport allocations of the RCAs, and hence result in being much more like Strategy A.

Current Trends (p9)

Graphs on page 10 – include a graph for road crashes or casualties by mode and comment on significant trends if any for walking and cycling in particular. Based on recent analyses of

national data, we suspect that, regionally, little gain has been made in terms of walking/cycling safety. An analysis of injury data instead of deaths may also be warranted as it will provide a more robust sample size to evaluate.

NZ Travel Survey data are included (p10) but should be shown as a graph to help emphasise how many walk trips exist – Census doesn't capture this as well because it shows only work trips.

Use NZTS data to illustrate trip length to reinforce how many short trips there are (proportions under 2 km, under 5 km). Tie this in with travel demand management chapter.

Traffic congestion (p12)

Text suggests that congestion is growing but does not specifically discuss TDM.

Environmental and social issues (p14)

Add: "Road motor vehicles are the largest and fastest growing component of CO₂ emissions." at the end of the middle paragraph. More mention should also be made of the growing awareness of personal health and obesity problems in New Zealand.

Targets for 2011 (p19)

- Why are carbon dioxide emissions not to exceed 10% above 2001 levels? Is this consistent with NZ's Kyoto Protocol targets?
- Does this really warrant a three tick rating under environment?
- Why not evaluate the targets against each of the LTMA's terms "integrated, safe, responsive, and sustainable" (rather than "equitable access, economy, social environment, environment and safety")?
- Can we quantify the current levels for targets (eg CO₂ emissions, deaths from road crashes per annum per 100,000 population, road deaths plus hospitalisations)?
- It would be useful to include targets for walking and cycling casualties and deaths.
- Why not have targets for 2010 and 2015, rather than just 2011?
- Under Christchurch targets, aim to reduce single occupant motor vehicle travel off-peak as well as during peak periods
- references should be to motor vehicles unless cycles are specifically included
- include targets for walking trips
- It is not at all clear why increasing the proportions of cycling and PT trips do not support the RLTS' Safety goal. There is clear evidence that encouragement of both (and walking) do increase overall network safety.

Key Result Areas (p21)

Replace the 8 KRAs from 1999 in the table with the four aims of the LTMA. It is difficult to see how the Roads KRA greatly supports Equitable Access and Social Environment. We suggest that the following sections be reorganised to reflect a desirable priority of focus, namely: Land Use, Demand Management, Alternative Modes, Freight, Roads.

Cycling (p27)

The reference to "Cycling in Canterbury: Strategy for the development of a regional network of cycle routes" should be noted as Attachment B, if in fact this is to be retained in its present form. We consider that Cycling in Canterbury should be deleted entirely from the RLTS, with any essential content (such as specific policies, actions or targets) transferred to the Cycling section of the main document.

The reference to Appendix 3 is ambiguous as there are two Appendix 3s (pages 83 and A-22).

Activities for 2005 – 2015 (p29)

Implementation of the CCC's cycling strategy is identified. Add a more general activity to implement any other cycling strategies (or cycling and walking strategies) that are developed during this period. Waimakariri District, for example, is currently developing a strategy.

Add a new activity – promoting cycling as a means of travel in Canterbury. Promotion of cycling is a key regional responsibility, although local councils have responsibilities here too.

Road Safety (p36-37)

A key priority should be the development and implementation of Speed Management Plans, e.g. greater use of 30/40 km/h zones, appropriate 50/60 km/h urban areas and measures to control speeds here, and more use of 70/80 km/h speed zones in rural areas where warranted.

Non-Strategic Local Roads (p42)

There is a danger that “*Prepare and implement asset management plans for transport infrastructure*” will give TLAs *carte blanche* to continue with poorly designed local road environments and unchecked road/capacity development. Just as the RLTS encourages CCC to continue its Living Streets programme, so all TLAs should have to consider sustainable design and planning practices in their land transport programmes.

Demand Management (p43)

We disagree with the statement “First, improve alternative transport options...”. Travel demand management (TDM) is a chicken and egg thing. There are already ample options (walking, cycling and public transport, plus trip chaining, and re-timing of trips to avoid congestion) that TDM should be undertaken immediately. Greater use of walking/cycling now also has been shown to reduce the personal risk (the “safety in numbers” effect).

Restraint measures might also mean greater use of traffic management to discourage through-traffic from certain areas (e.g. residential neighbourhoods and CBDs); this needs to be mentioned.

What has happened to the TDM targets of the 2002 RLTS? There were three specific targets which are no longer present in this section.

We seem to be dragging our feet on this issue. In 2002, a “major project” was to “undertake trials of demand management initiatives, leading to the establishment of an on-going demand management programme” by June 2004. Now, the RLTS seems to be taking a much softer line on TDM, and the June 2004 deadline seems to have passed without notice. We strongly request a much greater emphasis on TDM.

Parking (p45)

Transit NZ and other RCAs should also be encouraged to limit or control parking on arterial routes where this impacts on the safety and efficiency of all road users (e.g. where space is better utilised for turning bays, cycle lanes, kerb extensions, etc).

Land Use (p47)

We support this strengthening of this section and oppose any attempts to weaken the policies, planning methods or activities (p48-51). These are a minimum, in our view, in this area.

Economic Development (p51)

This seems a totally unnecessary section (the fact that it has only one Method and no Activities tends to reinforce that); a thriving economy is already encapsulated in the RLTS Goals. This section also has the potential to be narrowly interpreted as requiring more roads (or preventing traffic restraint measures) to achieve economic development.

Implementing the Strategy (p55-57)

A review of the Activities listed throughout the RLTS generally advocates no major development of further roading capacity around Christchurch. Yet our future planned transport funding programmes still show a significant amount of new road construction, and this is also reflected in the list of Activities on p57. At what point will the RLTS “walk the talk”?

Some might argue that many of the listed projects are in fact driven by regional freight needs. The problem however is that providing further road capacity for freight also opens them up for commuter access too. This is where projects such as developing rail access corridors and travel behaviour programmes can be much better targeted at the groups we wish to benefit. For example, in all of the work to date on the Christchurch northern corridor, we've yet to see any proper consideration of options like commuter rail and travel demand management.

Overview (p63-64)

For a document that is already too long, this is an unnecessary section and could be deleted.

Appendix 2 (p80)

Second para on this page – is this correct? *“Strategy E aimed to have eighty three percent of trips made by car mode around 2021”*. Although this Strategy is meant to be better than the status quo, it has a higher car mode share than at present!

Appendix 7 (p97)

General comment: Many of these indicators represent an *output*, not an outcome (or goal), which limits their usefulness. While we accept that it can be difficult to measure the latter, there can be the danger of trying to achieve certain output targets, without considering the bigger picture in terms of transport provision and the RLTS/NZTS goals.

Given the limitations of the journey-to-work Census data, it is surprising that the LTSA Continuous Travel Survey data (to be monitored on a regular basis from 2003 onwards) is not listed as a monitoring measure. Measures like the CCC regular cycle counts can also provide useful index trends.

The total length of cycle lanes is not a particularly useful statistic. As well as ignoring cycle *paths*, it also doesn't account for the length of streets that are “cycle-compatible” (e.g. low-speed and/or low-volume) without requiring special cycle facilities. In fact, “the proportion/length of streets with 30/40 km/h speed zones” would be quite a useful measure for many transport modes.

“Investment in Canterbury roads” is an unhelpful indicator if it is potentially at the expense of investment in alternative modes.

Raw cyclist/pedestrian crash/hospitalisation numbers are a misleading statistic. For example, if we doubled cycling (as targeted in the RLTS) and increased cycle crashes by only 20% this would be a much improved crash rate, yet this would have failed your proposed measure. Travel use data allows time-comparative crash rate estimates to now be made with reasonable accuracy.

Attachment A: Freight Action Plan – Investing in, and Maintaining Infrastructure (pA-15)

Objective 9 *“To ensure Canterbury receives a fair share of national level transport funding”* is inconsistent with the rest of the RLTS. While this may be an issue for transport funding in Canterbury as a whole, it should not be legitimised in the RLTS as a political football for road transport lobbyists. Quite clearly the issue being discussed is road funding; yet there are equally many desirable non-roading projects that are also potentially being deferred. We would also suggest that increased investment in the alternatives (as promoted by the RLTS) will actually decrease the overall transport funding required by Canterbury (or alternatively, allow for a considerably accelerated investment in these alternatives).

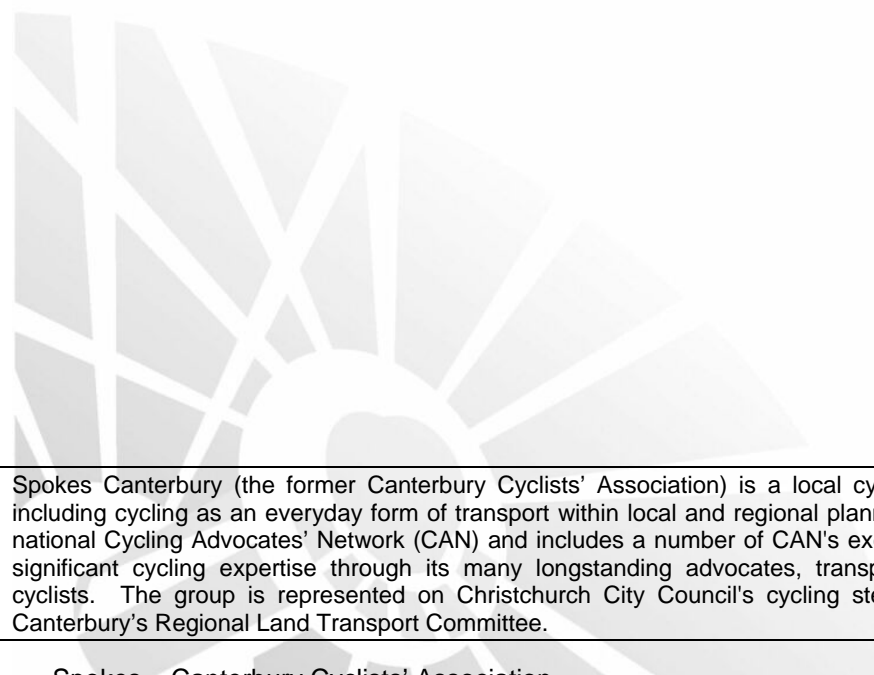


Attachment B: Draft Cycling in Canterbury

Further consideration is needed about the inclusion of Attachments A and B. They add considerably to the length of the document. Every page should earn its keep. Arguably, important material in these attachments should be included in the strategy proper, and the rest discarded.

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Spokes Canterbury (the former Canterbury Cyclists' Association) is a local cycling advocacy group dedicated to including cycling as an everyday form of transport within local and regional planning. The group is affiliated with the national Cycling Advocates' Network (CAN) and includes a number of CAN's executive members. Spokes provides significant cycling expertise through its many longstanding advocates, transportation professionals and regular cyclists. The group is represented on Christchurch City Council's cycling steering committee and Environment Canterbury's Regional Land Transport Committee.