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DRAFT CANTERBURY REGIONAL LAND TRANSPORT STRATEGY 2008-2018

SUBMISSION BY SPOKES CANTERBURY

General submissions

Spokes Canterbury welcomes the opportunity to comment on the draft RLTS. Spokes has been very supportive of Environment Canterbury's recent initiatives to promote walking, cycling, and public transport. However, the RLTS needs to strongly set the tenor (and indeed, legislative mandate) for the constituent local councils and Transit NZ which will largely be responsible for implementing the strategy.

Our submission is based on the draft Strategy and consultation with Spokes Canterbury members. We also support the submissions of Sustainable Otautahi Christchurch (SOC) and Living Streets Canterbury.

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. Despite being a transport strategy for the next 10-15 years there is a worrying lack of emphasis in the RLTS on the current unsustainability of Canterbury transport systems, and the effects of likely future increases in the cost of transport fuels (particularly post peak oil) on a transport system currently dominated by private vehicle use.

We note that cycling to work in Canterbury has decreased by 0.5% since 2001 (Census, 2006). The RLTS encourages a modal shift towards walking, cycling, and public transport with targets for 12% and 6% for cycling and public transport respectively by 2011. These may be optimistic in the short term, but much higher long term targets will need to be achieved if the RLTS goals and the National Transport Strategy's combined target for walking and cycling of 30% of all trips by 2040 is to be met. There are currently no longer term targets for walking and cycling in the RLTS, and these should be introduced.

There appears to be a major disconnect between support for a modal shift in the RLTS and the implementation section 5.2 (TRIP). The TRIP is predominately focused on

investment in roading improvements project for cars and trucks, along with some public transport projects. It appears that almost all the investment promoted by the strategy will be for these projects, with cycling and walking provision relegated (apart from a couple of references to SH bridges) to a few general statements and a minimal level of funding in each area. This indicates that the RLTS (and the supporting documents) doesn't really have any strategic vision about how and where cycling provision should occur, and how an increase in cycling is to be achieved

In terms of the total spend identified in the Strategy and the TRIP the long term direction appears to be largely "business as usual" (i.e. providing for more cars). Funding for walking and cycling is currently derisory, particularly when their combined mode share is compared with proposed investment in roads to support private car use, and this needs to change.

We consider that there is a real danger that the RLTS will end up as another set of platitudes about cycling and walking unless it is underpinned by a clear vision of what needs to be done to achieve an increase in these activities, and a commitment to invest in cycling infrastructure and support services (such as education, promotion, and facilities).

Specific submissions

Page 3

"there are also other plans..."

Our submission is:

All district and city strategies and plans should be listed, either here or in an Appendix this helps provide an incentive to those district councils without strategies and helps with those wishing to know what strategies exist. The Regional Council has a role to play sharing knowledge of resources available to other Councils. This also acknowledges that the various Councils' work and commitments to planning for transport are critical in achieving the region's targets.

We seek the following amendment(s):

Add a reference to "other relevant strategies and plans" at page 3, and list these in the strategy.

Page 18 Vision and Goals

Our submission is:

These are generally supported, and the existing goals should be largely retained. However, we have raised earlier our concerns about the lack of funding for walking and cycling when compared with their mode share of total transport use. In our view this is inequitable and inefficient, and results in these modes (and to a lesser extent public transport) being starved of the funding necessary to achieve their potential and contribute to a sustainable transport system. The strategy should include a specific goal that addresses this situation.

We seek the following amendment(s):

Include a new Goal 8 as follows:

A funding system for land transport which addresses inefficiencies and inequities in funding between modes and ensure planning and resources are directed towards those modes that are most effective and efficient in providing for a sustainable transport system.

Page 22 Targets for 2011

Our submission is:

The proposed targets are not well integrated with the goals and are for a relatively short period (3 years). The RLTS should include longer term targets so that progress in implementing the strategy can be assessed against these. The 2011 targets for cycling (12%) and public transport (6%) are relatively modest, but much higher targets will need to be set for the longer term if the goal of achieving transport system which promotes public health outcomes, is pleasant and environmentally sustainable is to be achieved. These targets also need to reflect the National Transport Strategy's goals for walking and cycling of 30% of all trips by 2040,

We seek the following amendment(s):

Include longer term targets that set benchmarks for achieving the RLTS goals, and that are consistent with the targets in the National Transport Strategy.

Alternative modes

The term "alternative modes" is used throughout the draft RLTS and in the draft TDM The Glossary (page 74) describes "Alternative Modes-Transport *modes* other than the private motor vehicle, usually *public passenger transport*, walking and cycling."

We are unsure why italics are used in the definition, unless to emphasis "public passenger transport" as the primary mode in this category of "alternative modes."

We suggest replacing the words "alternative transport" with "walking, cycling, and public transport". These modes listed in this order as per the ideal roading hierarchy. These words make it more consistent with common usage in other Strategies such as City and District Council Transport Strategies. It also separates walking and cycling from Public Transport.

"Walking and cycling" rather than "Active Transport" allows further clarification. These two active modes have different needs, with pedestrians using footpaths and requiring good pedestrian road crossing facilities while bicycles being a "vehicle" require good on-road facilities. Shared pathways are shared between pedestrians and cyclists, but in an urban environment in relation to commuting these are adjuncts rather than common transport commuter options. Buses and cyclists share "bus lanes". Car sharing or ride sharing can be covered under private car usage categories, as the infrastructure required is similar.

In some cases such as the “Canterbury Active Transport Forum”, the words Active Transport is appropriate as it is not necessary to define the two modes separately to achieve the goals of the forum.

Separation of the different transport modes allows easier measurement of targets and clearer allocation of what is being funded. Hence it allows a clearer understanding of what is happening in terms of modal shifts and what is required to be done to ensure all modes are accommodated.

The concept of “Alternative Modes” does not fit comfortably with the concept of making walking and cycling “mainstream”, it makes walking and cycling appear “fringe” modes, rather than what would be ideal as first or primary modes of transport.

(Reference: Koorey, G. Are you a cyclist or do you cycle? The language of promoting cycling. NZ Cycling Conference (2008) available at: <http://spokes.org.nz/articles>

We seek the following amendment(s):

Replace the words “alternative transport” with “walking, cycling, and public transport” throughout the Strategy.

Page 29 Cycling Policies 1.2 - Active Transport

Our submission is:

The proposed cycling policies are generally supported. However, we consider that reference to the Active Transport Working Group, as endorsed (but yet to meet) by the Regional Land Transport Committee should be included under “Planning methods” in this policy. A working group such as this can help with ensuring the RLTS targets are met and also in implementing the Cycling in Canterbury Strategy (ECan, March 2005) which has made inadequate progress since its adoption. It is our understanding a project has been undertaken to scope possible routes but other than this there has been little progress.

We seek the following amendment(s):

Add a new Policy after 1.2.5, as follows:

The Active Transport Working Group to co-ordinate and provide planning input into the implementation of new cycling and walking projects.

Page 29 Cycling Policy 1.2 - Cycling routes

Our submission is:

Any increase in cycling needs to be supported by the development of attractive, safe, and convenient cycling routes. Such routes are typical of cycle friendly cities in other parts of the world. While there are policies that provide for the planning of such routes, there are policies under Physical Methods that specifically support the development of such routes, some of which will require infrastructure provision or modification. In our view there has been plenty of planning but insufficient implementation of cycle routes in Greater Christchurch.

We seek the following amendment(s):

Include a new policy after 1.2.6 as follows:

Provide for the development of attractive, safe, and convenient cycling routes in urban areas with priority to be given to strategic locations and linkages that will encourage greater participation in cycling by commuter, utility, and recreational cycling.

Page 30 Cycling Policy 1.2.9

“Seek to provide physically separated cycling facilities on the strategic freight network and busy arterial roads where cycle safety warrants.”

Our submission is:

The proposed cycling policies are generally supported. However, this policy may have the unintended effect of diverting cyclists onto circuitous and indirect routes that are inconvenient and/ or may not be utilised.

We seek the following amendment(s):

Reword this policy to read “Seek to provide physically separated cycling facilities on the strategic freight network and busy arterial roads where cycle safety warrants *and these do not disadvantage cyclists in relation to distance and desired routes.*”

Page 34

Key result Area activities for 2009-2018

“Investigate the securing and protecting of future rail corridors in the long-term by designation, purchase, or other proactive means.”

Our submission is:

We consider that this key result area is progressive and forward thinking as existing and future rail corridors are valuable potential shared pathways (walking and cycling paths) for pedestrian and cyclists, and maybe light rail in the longer term.

The role of the Regional Council in providing integration is critical here as rail corridors generally cross district boundaries as well as those of other Regional Councils. We congratulate the Council on taking this initiative.

Page 45

Road Pricing

Our submission is:

This issue should be addressed in the medium term during the life of this Strategy rather than being deferred. This is particularly important given road congestion projections and the projected “funding gap” of \$370.2 million between proposed TRIP expenditure and total funding available that is identified in section 6.5 of the strategy.

We seek the following amendment(s):

That provision for assessment and implementation of road pricing measures be included in the Strategy.

Thanks again for the opportunity to make this submission. If there are matters requiring clarification, please contact our submissions co-ordinator Robin Delamore in the first instance. His contact details are: Phone 3599746, Email: robind@actrix.co.nz

Matthew Cutler-Welsh

Chairperson
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