



4 May 2006

Ref RM 03 02 56

Our Community Plan Submission
Christchurch City Council
PO Box 237
CHRISTCHURCH

Dear Sir / Madam

Draft Long Term Council Community Plan 2006/16 Submission

Thank you for the opportunity to submit on the Christchurch City Council Draft Long Term Council Community Plan 2006/16 (LTCCP).

Introduction

Land Transport New Zealand (Land Transport NZ) acknowledges the efforts of local authorities in preparing their LTCCPs. In particular, the LTCCP has an important role in integrated decision making and co-ordination of resources while providing for a long-term focus for the decisions and activities of the Council. The LTCCP, in particular, will also assist Land Transport NZ and others in the transport sector in planning activities so as to contribute to the purpose of the Land Transport Management Act 2003 (LTMA), namely the achievement of an integrated, safe, responsive and sustainable land transport system.

Land Transport NZ is committed to working collaboratively with local government and other organisations to develop the land transport system in a strategic manner. In doing this we are committed to an approach that is forward looking, collaborative, accountable and evidence based.

Land Transport NZ is committed to meeting the objectives of the LTMA and the New Zealand Transport Strategy. Land Transport NZ believes that the LTCCP process has a fundamental role in linking community outcomes with national objectives which are both then delivered through the LTCCP. Land Transport NZ believes that developing a programme that incorporates the comments above, will facilitate this and produce a more integrated approach that will meet all our common objectives.

Major Capital Projects

Page 71 – New Bus Exchange. Land Transport NZ acknowledges that the proposed bus exchange may be eligible for financial assistance through the National Land Transport programme (NLTP). However we consider the assumption that 'capital contributions from Central Government will be received to contribute to this project' is presuming too much. We are yet to receive or consider a formal

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application for funding of the exchange and no decision has been made by the Land Transport NZ Board as to whether this project will receive financial assistance. We ask that the stated assumption be amended as follows: "Council anticipates that financial assistance will be received from Land Transport NZ through the National Land Transport Programme. N.B. Land Transport NZ are yet to consider funding for this project.

Streets and Transport Activity Statement

Land Transport NZ understands that your council is consulting on your 2006 / 07 LTP in accordance with the provisions of section 13 of the LTMA. Land Transport NZ would like to state that whilst your LTP is included in the Draft LTCCP, the fact that you are consulting on the LTP is not clear. Land Transport New Zealand suggests the LTCCP should clearly state that the 2006 / 07 LTP is incorporated into the LTCCP as provided for by section 13 of the LTMA.

In order to ensure that the LTP contained in the LTCCP meets with the requirements of the LTMA, Land Transport NZ draws your attention to the requirements of section 13 of the LTMA. This requires that the provisions of section 12 and Schedule 1 apply in full to the land transport aspects of the LTCCP, if the LTCCP is to be used as a substitute for the LTP.

Schedule 1 of the LTMA describes the content requirements for an LTP or in this case the land transport components of a LTCCP. Broadly speaking it must describe:

- Each activity or activity class for which payment is sought via the National Land Transport programme
- How the objectives and purpose of the LTMA have been taken account of
- Consultation undertaken to prepare it
- Steps taken in developing land transport options and alternatives
- 10-year financial forecasts of funding and expenditure

Land Transport NZ considers that the tables on page 155 of your LTCCP do not meet the financial requirements of the LTMA. We acknowledge that some detail on capital activities is provided on page 84 for the first three years of your LTCCP but not the full 10 years as required by the LTMA.

However we note that in addition listing the activities in the LTP / LTCCP, the LTMA requires a LTP / LTCCP to set out for each activity or activity class their:

- Priority
- Total Cost
- Proposed starting date and duration
- Alternatives and options considered
- The objectives of each activity
- Contribution to the purposes and objectives of the LTMA

Land Transport NZ refers Council to the National Land Transport Programme Guidelines 2006 / 07, Booklet 1 (in particular pages 20 and 21) for further advice and the LTMA to ensure that the requirements of the Act are met. Failure to meet the requirements of the LTMA may result in part or all of your LTP being unable to be included in the National Land Transport Programme (NLTP). Land

Transport NZ also wishes to state that it is the responsibility of the approved organisation to ensure that legislative requirements are met and that Land Transport NZ's comments, with respect to the above do not necessarily cover all of Council's obligations.

We acknowledge that your council has indicated a broad range of capital and operational transport activities in the Plan. However, we have been unable to ascertain from your LTCCP how you have assessed that your LTCCP has taken into account the objectives of the LTMA as required by section 12(3) of the LTMA. This is a fundamental analysis required for all land transport activities proposed to be included in an LTP. We suggest that your LTCCP will need to complete this assessment to comply with the LTMA requirements for an LTP. Similarly there is no evidence that the LTMA Schedule 1 section (5) requirement for assessment of activities and activity classes has been completed.

Page 151 proposes a performance measure for accident statistics with target performance for years 2006/07 – 2008/09 having the same target. We suggest that in order for your council to make progress on achieving safety improvements in line with the Road Safety 2010 Strategy there should be clearly stated targets to achieve a reduction year on year in crashes and casualties over the life of the LTCCP.

Asset management

Land Transport NZ regard the development and implementation of robust asset management plans as vital to the long term sustainable provision of transport infrastructure. Asset management planning established the proposed levels of service; this in turn will determine the rate of asset renewal capital improvements required and future funding requirements. The funding requirements will then need to be given effect to in your LTCCP.

We have completed a cursory review of your transport related activity management plans. As a result of this review we have noted some concerns with the various plans including the technical basis for the proposed renewals programmes and performance measures. For example

- your activity management plan for streets places a considerable emphasis on future renewals for pavements based around the rate of renewal of kerb and channel. Kerb and channel, and pavements have differing renewal profiles related to quite different asset condition considerations. Each should be managed according to its respective technical needs.
- We consider the asset related performance measures as proposed do not take into account how current network performance compares to industry trends.

We would welcome the opportunity to discuss your asset management planning for this activity.

Development Contributions Policy

Land Transport NZ supports the thrust of the proposed policy and notes the intention to refine this to include infrastructure for the former Banks Peninsula District Council.

Land Transport NZ does not consider it necessary to present this submission in person at the hearings, however if you have any questions or queries we would be happy to meet and discuss with you at your

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Yours sincerely

A handwritten signature in black ink, appearing to be 'JC' followed by a large, sweeping loop that extends to the right.

Jackie Curtis
Partnership Manager - Southern