Christchurch City Council comments on the Draft South Island Freight Plan

1.0 Overall

1.1 The Christchurch City Council (the Council) is supportive of the Draft South Island Freight Plan (the Freight Plan).

2.0 Comments

Hierarchy of Freight

2.1 The Freight Plan should make it clear where freight is placed within a hierarchy of transport modes, including walking, cycling, public transport, and private motor vehicles. Many roads, particularly in metropolitan urban areas, cater for a variety of transport modes which are often competing for limited road space. Therefore it is important that the needs of freight are clearly assessed against the needs of other transport modes. Providing for the efficient movement of freight may be beneficial for freight but may come at the detriment of other transport modes. Accordingly the Freight Plan needs to be clear that freight needs will have to be balanced with the requirements of other transport functions and modes. For Christchurch, the *Christchurch Transport Strategic Plan* identified routes where freight movements would be given a higher priority over other functions. However, there will be other roads where other transport functions will be prioritised over freight, so it needs to be made clear that freight will not be able to be prioritised on every road and on some roads freight movements may be discouraged. It would be helpful if the Freight Plan adopted a similar approach to denote where Freight fits within the hierarchy of other modes across the South Island.

Assumptions for Freight growth

2.2 The Council considers that the predictions for freight growth in the plan need to be reconsidered, particularly in the light of recent changes in milk prices. Many of the assumptions behind the predictions were developed in 2012 and 2013, since then there have been changes in demand, such as the dairy down turn that need to be taken into account. It is difficult to accurately predict freight growth and Council recommends that a band with a range from a low growth to a high growth scenario is used rather than a single figure. This is the approach that was used with the Greater Christchurch Freight Study to resolve similar issues. The table on page 12 should be split to distinguish between export commodities and domestic commodities as there as different assumptions and certainties between those two groups of commodities.

Use of Rail

2.3 The Freight Plan predicts that there will be a decrease in the mode share of rail freight to 2042 to 6%, whilst there is an increase in the mode share of road freight. The Freight Plan should be aspiring for an increase in the mode share of rail freight and putting plans in place to achieve that. As mentioned before there are many transport modes competing for limited road space, in particular in urban areas, which can decrease the efficiency of road freight. Greater use of rail freight can reduce the pressure on roads in urban areas. The Integrated Transport Assessment (ITA) for the Lyttelton Port Recovery Plan states that currently 20% of containers travel by rail to the Port and the ITA is predicting that will increase to 30% in 2026 and 40% in 2041. This increase in rail freight should be shown in the South Island Freight Plan and there should be an increase in the use of rail freight in other parts of the South Island to reduce the amount of trucks travelling through the Christchurch urban area to the Port of Lyttelton. An increase in rail freight also needs to be planned with rail improvements to cater for both rail freight and future commuter rail services on Christchurch's rail network. There is a need to integrate road and rail to improve overall freight network productivity.

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Changes to Brougham Street

2.4 Brougham Street has been identified in the Freight Plan for improvements. Whilst Brougham Street is the key road access between the Christchurch Southern Motorway and the Port of Lyttelton, it is also a key urban arterial road being used by a variety of transport modes, (e.g. walking, cycling, public transport, private motor vehicles) as well as freight. Many homes, commercial properties, schools and parks are located along this route. More people cross Brougham Street (over 100,000 people daily) than travel along Brougham Street (40,000-50,000 people daily). It is important that any changes to Brougham Street do not negatively impact on the surrounding communities and the people crossing Brougham Street, between Christchurch's southern suburbs and the Central City. The An Accessible City Chapter of the Christchurch Central Recovery Plan proposes that the "*new central city will be a great place to live, work, play, learn and visit. It will be more attractive and compact, and will offer a wider range of activities. … The transport system will allow people to travel easily between the central city and other parts of Christchurch*"[1]. There are critical routes (e.g. core public transport routes, urban arterials, major cycleways and pedestrian links) that cross Brougham Street. Therefore it is important that these routes are protected and not delayed by network changes to Brougham Street so they can continue to support the accessibility and economic function of the City. Council would prefer that more focus was put on moving more freight by rail to the Port of Lyttelton, rather than encouraging more trucks to use Brougham Street which will create further congestion and severance issues for other parts of the network.

Resilience of Lyttelton Tunnel

2.5 Council is committed to rebuilding Sumner Road, but even with a rebuilt Sumner Road, the majority of freight will still use the much shorter route to the port through the Lyttelton Tunnel. There are some safety risks with the tunnel, such as the risk of a fire and little height clearance for tall trucks at the top of the Tunnel, which could affect port operations if the Tunnel was closed as a result of an accident or fire. A long term resilient access solution to Lyttleton should be considered, including whether a long term aspiration for an additional dedicated freight tunnel is an option. This should also consider how such an option can help avoid port freight travelling through the urban area of Lyttelton. Once again greater use of rail rather than road would help with this issue.

Impact of Freight on communities

2.6 It should be recognised that whilst the movement of freight can bring benefits to the economy, it can also have negative impacts on communities. Trucks can cause noise, vibration, pollution and severance issues for communities. Trucks can also cause greater damage to the life of roading infrastructure compared with the average private motor car. The speed and size of trucks can also pose a safety risk for more vulnerable road users. So it is important that the movement of freight is managed to reduce these impacts. The 'rat-running' of freight through residential communities should be discouraged. Freight should be encouraged to travel at slower speeds in urban areas.

New Technologies

2.7 The Freight Plan should also plan for the potential role of new technologies to improve the efficiency and safety of the freight task. Increased use of cycle couriers (including electric bikes) and advances such as; the renewables highway, driverless vehicles, drones, and electric vehicles, could better utilise the existing capacity of infrastructure to meet the freight task. These need to be planned for and infrastructure provided to ensure that the South Island is ready to take advantage of these technologies and is competitive with other areas domestically and internationally.

Role of Regional Councils

2.8 Road controlling authorities have the statutory responsibility of managing freight on their transport networks. Regional Councils are not road controlling authorities. So the role of

[1] An Accessible City Chapter of the Christchurch Central Recovery Plan Page 5

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guiding and coordinating the implementation of the Freight Plan should be the domain of road controlling authorities, rather than Regional Councils. This is notably so in significant urban centres such as Christchurch, where the principle issues are traffic management within the local network.

Fuel price volatility

2.9 On page 5 of the Freight Plan there is a bullet point 'Uncertainty concerning fuel price volatility'. However, this is not expanded upon in the document. There is an expectation that transport fuels (and bitumen-related products to make roads) will continue to be readily available up until 2042 whereas the growing evidence would suggest that while that might be the case to a degree, the fuel being sourced will become increasingly expensive as it is required to be sourced or extracted from geologically difficult-to-access sites, is of poorer quality (requiring more sophisticated and expensive refining) and where oil resources are in regions of conflict. While the global demand for oil products has reached a relative plateau since the huge fluctuations and upheavals of 2008, the International Energy Agency still predicts rising oil prices in real terms over the next two decades. There remains work to be done to explore particular vulnerabilities that an uncertain future for oil supply and price might have on communities and businesses in the greater Christchurch region and the rest of the South Island.

2.10 In the table on page 4 of the Freight Plan, the constraints / challenges should refer to future fuel supply. This would involve greater preparedness of organisations (including local and central government for short-term fuel emergencies (a shock or stress) and the need for regional organisations to adopt risk management strategies to deal with a range of oil price pathways and short term volatility in prices. Consideration of this preparedness approach (and reliance on business-as-usual) doesn't appear evidence in this draft document. The Council refers NZTA to work undertaken by Environment Canterbury in 2009 - Vulnerability assessment of the impacts of peak oil on the Canterbury Region which proposed such a response as a way forward from the 2008 oil price spike crisis.

Rationalisation of Ports

2.11 The National Infrastructure Plan states that in 2045 most of our international freight is moved through a few large ports[2]. The South Island Freight Plan should plan for and consider the implications of this potential rationalisation of the number of ports. This could have implications on the needs of the land transport network to service these ports. Similar considerations should also be had of airports.

[2] Page 25, The Thirty year New Zealand Infrastructure Plan 2015

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