

19 March 2021

Greater Wellington Regional Council 100 Cuba Street, Te Aro P O Box 11 646 WELLINGTON 6011

Dear Sir / Madam

#### DRAFT WELLINGTON REGIONAL LAND TRANSPORT PLAN 2021

Thank you for the opportunity to submit on the Wellington Region Land Transport Plan (RLTP) 2021. We wish to submit the following comments:

#### General

- 1. The Kāpiti Coast District Council (Council) generally supports the RLTP but would like to take this opportunity to raise issues of relevance to Council.
- 2. The Kāpiti Coast has seen significant growth in the last 30 years, and this trend is expected to continue. The Regional Growth Framework (RGF) has signalled substantial growth in the region (200,000 people), of which around 43% are to be accommodated along the Western Growth Corridor from Tawa to Levin.
- 3. The Council through our Growth Strategy will be responding to the RGF. A key part of supporting this will be a need to invest in transport infrastructure that provides for growth in a co-ordinated way to achieve the strategic objectives and transport priorities identified in the RLTP. The changing pattern of growth and the Western Growth Corridor, therefore, needs to form a key part of our thinking to ensure that that new brownfield and greenfield development, is well connected, supports mode shift, and addresses climate change.
- 4. The Council has advocated for some time for improved services to the north of our District. This will become increasingly important to support the level of growth identified in the Regional Growth Framework, give effect to the National Policy Statement on Urban Development, and capitalise on the opportunities it presents.

### Strategic Objectives

- 5. We support the strategic objectives in the RLTP, which are consistent with the focus areas in the Council's Sustainable Transport Strategy. These include improved connections and mode choice, integrating transport and land use, safety, resilience, climate change and the environment.
- 6. We note that the strategic objectives include "Journeys to, from and within the Wellington Region are connected, resilient and reliable" and consider that there should be a stronger message in the RLTP around the links between Kāpiti and Horowhenua.
- 7. These links are likely to strengthen further in the future, and many of our residents look north for services, including healthcare, education, employment, legal services and economic opportunities. Kāpiti is the gateway to the Wellington Region with transport forming part of a wider network rather than Ōtaki being the terminus, and significant growth is planned for Levin. This should be supported by transport links for all modes, and partnership working at District and Regional Council level as well as with Kiwirail and Waka Kotahi, will be fundamental to the success of improved connectivity to the north.

## **Headline Targets**

- 8. We are supportive of headline targets for climate change, mode shift and safety, and consider that working together to implement measures to support the achievement of these targets will be fundamental. However, we note that the Climate Change Commission has recently provided advice which may require further thought in the next stage of the RLTP. In particular, the need to more quickly decarbonise transport if we are to achieve net zero emissions by 2050, and the Climate Change assumptions that "walking, cycling and public transport can be increased by 25%, 95% and 120% respectively by 2030".
- 9. As you are aware, Council has declared a climate change emergency and, therefore, we also support the measures to encourage mode shift and address climate change identified in tables 1 and 3 of the RLTP.
- 10. The Council implements a number of measures to encourage mode shift and address climate change through replacement of our fleet with electric vehicles, implementing electric vehicle charging stations, and developing cycle and walking infrastructure.
- 11. The Paraparaumu Town Centres projects, identified in the RLTP, in particular will support the development of infrastructure that supports mode shift and provides improved accessibility to the rail station and the town centre for pedestrians, cyclists and public transport.

# **Transport Improvement Priorities**

12. We support the Transport Priorities identified in the RLTP and consider that they will ensure that the strategic objectives and headline targets can be met. Council is strengthening our infrastructure to support a wide range of transport options.

### **Public Transport**

13. Council considers that the development of public transport services, particularly to the north of our District, will be significant in supporting sustainable growth and travel patterns.

- 14. We have submitted on the Regional Public Transport Plan, that for many years the public transport system has been recognised as an area for improvement by the local community and we consider that there are opportunities to make improvements beyond those already identified. Internal connectivity across the District will play a critical part in achieving mode shift both now, and in the future where we will see significant growth.
- 15. In particular, we want ensure that connectivity is improved both within Ōtaki and from Ōtaki to the north and south, as well as to the railway stations in Ōtaki and Waikanae. Unless there are significant and programmed improvements to public transport services between Ōtaki and the rest of the region, there is a risk that the RLTP Objectives 1 (people in the Wellington region have access to good, affordable travel choices;) and 5 (journeys to, from and within the Wellington Region are connected, resilient and reliable) will not be achieved. Improvements also fit with the measures to address Council's climate change emergency declaration, by assisting in reducing emissions from private motor vehicles.
- 16. In recognising the need to improve public transport and encourage sustainable transport patterns, we support the weighting given to Transport Investment Priority (TIP) 1 (Public Transport Capacity), and TIP 2 (Travel Choice). However, in progressing with transport investment decisions, we consider that focus on Wellington City's transport issues should not preclude proactive action relating to the new growth areas.
- 17. The improvement of public transport will be key to giving effect to the RGF and the National Policy Statement on Urban Development (NPS-UD), with regards to the level and location of growth, and the extent of intensification that will be enabled around rapid transit services and stops. More detail on this is provided at paragraphs 24 to 30 of this submission.

### The Kapiti and Manawatū Rail Lines

- 18. There has been high demand on the Kapiti Line, with patronage steadily increasing and we have seen evidence of a strong recovery post the 2020 COVID-19 lockdown. This demand is likely to continue and we support measures to improve rolling stock and infrastructure on the Kapiti Line.
- 19. However, services in the north of the District are relatively poor and we note that, whilst there is a business case proposed for improvements to the Manawatū line in the Regional Public Transport Plan, implementation is likely to take place in the medium term to 2028.
- 20. Council considers that the rail network is critical to support growth and encourage mode shift, particularly for commuter journeys within our District and into the City. Currently there is heavy reliance on the private car, where over 50% of our workforce commute in a private vehicle or company car and over 30% of our residents travel outside of Kāpiti for work. This contributes to transport issues within the District and in Wellington City where greenhouse gas emissions, parking and congestion are an issue.
- 21. The North Island rail network is electrified from Wellington station to Waikanae, and also from Palmerston North to Te-Rapa north of Hamilton. We consider that there is a strategic opportunity and good reasoning to extend the electrified passenger train network further north in the Region.
- 22. This is why Council has sought for some time the extension of double tracking and electrification of the rail north of Waikanae, to better serve communities such as Ōtaki in the north of our District. We would like to see this prioritised in the plan and consider that addressing the needs of Ōtaki, and advocating for electrification, will go some way to

supporting the achievement of the RLTP's headline targets, as well as delivering sustainable growth identified in the RGF.

- 23. The Council has submitted on the Draft New Zealand Rail Plan including:
  - calling for infrastructure improvements and to be implemented more quickly than is envisaged in the plan;
  - supporting investment in the Capital Connect service, and consider that funding for both infrastructure and rolling stock is required to realise service improvements;
  - acknowledging investment proposals for the Kapiti Line but seeking that these should be recognised as more than just future opportunities;
  - supporting full electrification of the North Island Main Trunk Line;
  - urge that cross border complexities should not disadvantage our community and project delivery; and
  - asking for further detail on the new platform at Waikanae.

## **Planning for Growth**

- 24. With the construction of the Roads of National Significance within the Kāpiti Coast District (Transmission Gully, M2PP, PP2O, and the future Ōtaki to North Levin expressway, Ōtaki is set for high demand for people who work in the region but are seeking more affordable housing. These growth pressures are already being seen in Ōtaki, as house prices and rents rise to meet demand.
- 25. If we are to support the level of growth indicated in the RGF there needs to be a clear and co-ordinated implementation plan that links the delivery of new development to the delivery of high quality public transport.
- 26. As identified earlier in this submission, the RGF anticipates Kāpiti will provide for a substantial proportion of the expected 200,000 extra people who will need to find homes and jobs across the wider Wellington region, including Horowhenua. It specifically anticipates Ōtaki will be a significant part of that additional housing capacity both through brownfield infill type intensification of existing urban areas, but also greenfield around its fringes.
- 27. Kāpiti District is classified in the NPS-UD as a Tier 1 council alongside Wellington City and Porirua. This will need to be carefully considered in the context of a plan change, and we need to make some decisions about how much intensification should occur in Ōtaki. A major criteria is connectivity to public transport and related to that, what's planned for the railway station. To this end, we would find it difficult to encourage or make provision for development if improvements are not implemented in a timely manner, or can be considered to be planned within the context of the NPS.
- 28. Related to our comments on the RGF and Council's response to it through the development of the Growth Strategy, the NPS-UD has a particular focus on urban intensification around what it defines as "rapid transit services/stops". That definition centres around some key terms such as "quick", "reliable", "frequency" and "capacity".
- 29. The RLTP states that the identification of rapid transit stops are to be confirmed, and that the NPS-UD extends the definition of mass rapid transit to include planned improvements. It is possible for a stop which does not currently meet that definition to still be considered a rapid transit service/stop if sufficient evidence exists it is "planned" to be.

- 30. As previously stated, the level of service in Ōtaki is low with only one diesel passenger service to Wellington. We understand this service is provided by another operator which means that, if it ceases to operate, Ōtaki will have no passenger rail service into Wellington unless it is resourced by GWRC. To this end, we support priority one of the significant activities table Manawatū Line fleet renewal and service increase.
- 31. However, we seek further clarity around what this means, and in order for us to understand if we should consider it to be "planned". In other words are the necessary investments going to be made in the short to medium term that will turn that service/stop into a "quick, reliable, frequent and high capacity" service/stop?
- 32. If there is strong evidence for Council to consider Ōtaki to be a "planned" rapid transit stop, this is likely to support higher density of urban development in Ōtaki being enabled through an upcoming change to our district plan. In turn, this should improve future uptake of public transport in Ōtaki as well as assisting council to meet its obligations to provide sufficient development capacity in our district under the National Policy Statement on Urban Development.

#### Collaboration

- 33. Given our comments on growth and public transport provision in the north of our District, we wish to see closer partnership working and engagement with Greater Wellington Regional Council when undertaking bus network reviews and developing route changes.
- 34. Similarly, we would also urge that Greater Wellington Regional Council work with Council to identify opportunities for areas where joint working can support and encourage an increase in public transport use.
- 35. As an example, we look forward to working with Greater Wellington Regional Council on the development of Station Access Plans, and strongly advocate for improved public transport services in Kāpiti.
- 36. Collaborative working should extend beyond the regional boundaries and believe this should be recognised further. As identified in our submission on the Draft New Zealand Rail Plan, cross border complexities should not disadvantage our communities and delivery.

#### Significant Activities

- 37. We support the priority given to the East West Connectors project and Town Centre Accessibility Improvements in the Significant Activities List in section 4.5.2. The Council is in the process of developing a Programme Business Case for this scheme.
- 38. We have raised the importance of connectivity within the District, and its relevance to the strategic objective for journeys within the Wellington Region to be connected, resilient and reliable.
- 39. The Council's Sustainable Transport Strategy raises east west connectivity as an issue for the District. The East-West Connector project will form an important part of our transport network to address these issues, improve accessibility, support revocation plans and town centre enhancements, and enable town centre development.

## **Final Comments**

40. The Kāpiti Coast District Council appreciates the opportunity to comment on the draft RLTP and looks forward to continuing to work closely with you in future.

Yours sincerely

Sean Mallon

**Acting Chief Executive**