26 April 2018

Chris Laidlaw
Chair
Greater Wellington Regional Council
PO Box 11646
Manners St
WELLINGTON 6142

Dear Chairperson Laidlaw

GWRC Long Term Plan 2018-2028

1. Thank you for the opportunity to submit on the *Greater Wellington Regional Council (GWRC) Long Term Plan 2018-2028.*
2. Kāpiti Coast District Council (Council) takes this opportunity to write to GWRC about a number of issues of interest to Kāpiti, and welcomes future opportunities to meet and discuss how our agencies can work together to plan and deliver our services.

Regional leadership

3. Council acknowledges the important role GWRC plays in driving strategic planning across the region, and recognises the many challenges involved in developing a coordinated approach to shared issues across the region.
4. Council is pleased with GWRC's intentions to build on its relationships with its mana whenua partners to ensure that they are intimately involved in the development and implementation of GWRC's work programmes (Supporting information, p116).
5. Council would also support efforts within GWRC for further alignment across programmes of work that have significant overlaps, but are not always aligned. As an example, 'freshwater management and biodiversity' can occasionally be at odds with 'flood protection and control'. Our Council finds itself caught in between these two work programmes at times and, as a result, it can be difficult to move either programme forward (as discussed further in this submission). The same could potentially be said for 'economic development' and 'transportation'. For some of our most transport disadvantaged communities, access to affordable transportation is important for job seekers but they can find themselves trapped in situations where affordable transportation is not available at peak commuter

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hours because they live on the outskirts of the region where demand is lower so the priority is lower (as also discussed further in this submission).

Proposed rates

6. Council is extremely concerned by the potential impact of the revenue and financing proposals in this LTP. Council notes the average rates increase proposed is 6.7% for the 2018/19 year. By our calculations, the total increase in rates contributed by Kāpiti residents under this new proposed policy would be 14.1% (increase from $9,327,068 in 2017/18 to $10,644,427 in 2018/19). This is totally unacceptable.

7. Council is concerned that these rates increases are too high and do not take into account residents' ability to pay these rates. According to Census data, in 2013 the median household income in Kāpiti was $53,400 compared with $74,300 in the Wellington Region and $63,800 in New Zealand. Similarly, the Ministry of Business, Innovation and Employment (MBIE) found that in 2017 the average household income in Kāpiti was $90,500 compared with $113,600 for the Wellington Region.[1] It is not apparent from the consultation document that there has been adequate assessment in accordance with Section 101(3)(b) of the Local Government Act, which requires consideration of 'the overall impact of any allocation of liability for revenue needs on the community'.

8. Council notes that the transition from the rates review is proposed over 3 years, although it is not entirely clear how the new models would be implemented across the 3 years. Three years is an unacceptably short timeframe, imposing a significant burden on our District, which we have noted has some of the lowest ability to pay in the Region. Council recalls that GWRC went through a similar transition with its funding assistance rate (FAR) for rail transport, however, that transition was over ten years. Council requests that any rates review is implemented over a ten-year transition, not a 3-year transition.

9. Council further requests GWRC reprioritise its activities to reduce the rates increase. Council has recently undertaken the same exercise itself and deferred operating expenditures – many of which Council considers to be more important than some of the newly proposed GWRC expenditures – in the interest of affordability for our ratepayers. It is therefore unsatisfactory to see this effort eroded by GWRC's proposal for such a significant rates increase.

10. As a point of clarification, Council notes that GWRC calculates rates according to equalised capital values (ECV). This Council requests further clarification on how the ECV has been applied to this District, given our recent revalution.

[1] MBIE's Regional Economic Activity Web Tool.

RATES INCREASES

- Council is alarmed that these proposed rates increases are excessive and unacceptable. They do not take into account residents' ability to pay these rates;
- Council requests that any rates review is implemented over a ten-year transition, not a 3-year transition; and
- Council further requests GWRC reprioritise its activities to significantly reduce the rates increase.

Funding for transportation and flood management

11. Council supports GWRC's intention to develop more transparent funding models that connect levels of benefit more closely with funding, and notes that the new funding model proposes changes to rates allocations for public transport and flood protection because these are the two biggest areas of work for GWRC (Consultation document, p3). While Council appreciates GWRC's intention to distribute rates across the region in a more equitable manner, Council argues that residents' ability to pay (i.e. relative affordability) must also be considered.

12. For transportation funding, the new model proposes to treat the region as one geographic entity served by a single transport network, while recognising that different rating categories (i.e. residential, business, CBD and rural) should pay differently because they derive different levels of benefit from the network. As such, the proposal applies differentials to reflect the different levels of benefit each category receives.

13. Council notes that all of Kāpiti appears to fall into the standard rating categories for residential, rural and business. This means that residential, rural and business areas in Ōtaki would be charged like the rest of the region, excluding the Wairarapa who receive a differential because they are deemed to receive lower levels of benefit from the transport provided.

14. Council does not support an average cost model for transport funding, and believes a marginal cost model is more appropriate. Our commuters already provide the highest farebox revenues per passenger due to distance travelled (not including Wairarapa). Council advises that this revenue far exceeds the marginal cost of the rail network provided in our District.

15. In addition, Council contends that north of Waikanae there are considerably lower levels of public transport benefit. As GWRC is aware, regular train services north of Waikanae are extremely limited and there are fewer bus runs. In addition, Ōtaki and Ōtaki Beach have some of the highest rates of deprivation in the region (NZDep 9 based on University of Otago NZ Index of Deprivation).

16. Because these are low income communities with low levels of public transport benefit, we contend that the residential and business categories in Ōtaki and its surrounding areas should be given the same differentials as the Wairarapa.

17. Moreover, in recognition of the new Government's revised priorities as expressed through the GPS on transport, Council requests that GWRC should advocate to

NZTA for an increase to the rail FAR. An increase from other funding sources could alleviate pressures to increase the rates funded component of the service.

PUBLIC TRANSPORT FUNDING

- Council does not support an average cost model for transport funding, and believes a marginal cost model is more appropriate. Our commuters already provide the highest farebox revenues per passenger due to distance travelled (not including Wairarapa). Council advises that this revenue far exceeds the marginal cost of the rail network provided in our District.
- Council supports the proposed differentials for public transport rates provided that the Ōtaki area (i.e. north of Waikanae) is provided the same differential as the Wairarapa.
- Recognising the new Government's revised priorities as expressed through the GPS on transport, Council requests that advocacy to NZTA for an increase to the rail FAR is undertaken, rather than an increase to the rates funded component.

18. For flood protection, the new funding model seeks to transfer more of the flood protection costs to the communities receiving the most benefit from GWRC's flood protection programmes. Under the new proposal, a targeted rate on all properties within each catchment would fund 70% of the flood protection costs for each catchment while the remaining 30% would be funded from targeted rates on equalised capital values (ECV) across the region.

19. Under the existing model, Kāpiti residents will contribute $1,368,226 for river management and flood protection (excluding GST) in 2017/18. Under the newly proposed model, however, it appears as if Kāpiti residents will pay nearly double -- based on the rates calculations provided by GWRC, a total of $2,629,706 for river management and flood protection (regional rate of $1.0m and catchment rate of $1.6m combined, excluding GST). Council requests more information to explain and understand the impact of the proposed model on Kāpiti residents.

20. Council does not accept that a funding model recovering asset costs over less than the economic asset life is appropriate, and Council would like to understand the terms over which debt funded capital expenditure is recovered through rates as it is unclear whether there is appropriate consideration given to the intergenerational benefit of the capital expenditure. As an example, recovering the costs of a 50 year stormwater asset over 25 years is inequitable to current ratepayers, by a factor of 100%. At a time when councils are struggling to fund infrastructure across the country, this approach by GWRC is egregious and cannot be justified.

FLOOD PROTECTION FUNDING

- Due to the unreasonable increase in rates for Kāpiti ratepayers, Council does not support the proposed change from the current funding policy for flood protection, unless there is clear understanding of the benefits that the additional funding will deliver to Kapiti residents.
- Council would also like to understand the terms over which debt funded capital expenditure is recovered through rates as it is unclear whether there is appropriate consideration given to the intergenerational benefit of the capital expenditure. Council would have an issue if the rates funded debt repayment profile is considerably shorter than the useful life of the flood protection assets.

Proposed rates remissions and postponement policy

21. Council has conducted extensive research during the development of its LTP on rates affordability. Using data on affordability at an area unit and meshblock level, Council sought an understanding of affordability challenges in different areas of the District. While this rates review considered only Kāpiti Coast District Council rates, GWRC rates were included in order to ensure a complete picture on affordability.

22. At an overall level, Kāpiti rates (including GWRC rates) are relatively high as a proportion of median household income (5.2%). This is largely because household incomes are lower in Kāpiti.

23. Recognising the affordability issues in the District, the Council currently budgets $175,000 to fund rates remissions where residents are experiencing difficult financial circumstances.

24. GWRC rates as a share of the total rates charged to Kāpiti residents is proposed to be 14% of the total rates paid by Kāpiti residents during 2018/19. Therefore, Council argues it would be appropriate for GWRC to contribute approximately $28,000 towards remissions for Kāpiti residents to represent GWRC's share of the rate burden on households, particularly given the significant increases proposed for the 2018/19 year.

RATES REMISSIONS

- Council argues it would be appropriate for GWRC to contribute approximately $28,000 towards remissions for Kāpiti residents to represent GWRC's share of the rate burden on households, particularly given the significant increases proposed for the 2018/19 year.

Transport

25. A high quality transportation network is important to several of GWRC's community outcomes – connected communities, a strong economy, and healthy environments (Supporting Documentation, p12).

26. The Wellington Region Land Transport Plan (RLTP) defines a high quality public transport network as one that is frequent, comfortable, safe, easy to use, and reliable (2015, p10).

27. While Council appreciates recent investments towards the Kāpiti public transport network[2], Council remains concerned about:
    a) the challenges some residents face when trying to access the network, particularly transport disadvantaged residents; and
    b) the frequency and reliability of the network.

28. The Wellington Regional Public Transport Plan (RPTP) states 'the provision of travel options and access to basic community activities *for all members of the community* is one of the key roles and social benefits of the region's public transport system' (2014, p135, emphasis added).

29. Council acknowledges GWRC's current intentions to introduce newer technologies to the public transport network[3], and notes GWRC's contention that 'higher quality infrastructure and facilities will make public transport more attractive and more accessible for all users, *including the transport disadvantaged*' (RLTP p37, emphasis added). Council is not convinced, however, that these changes will automatically translate to improved services for transport disadvantaged residents. Furthermore, Council is concerned that these investments have taken priority over other investments that would provide greater benefit to the transport disadvantaged.

30. The RPTP defines transport disadvantaged as those who are 'least able to travel to basic community activities and services' (p135). Many factors – such as age, physical or mental disabilities, income, and location – can restrict accessibility to public transport services and facilities. In Kāpiti, two factors that contribute most to restricted access are (i) availability of transport and (ii) the cost of transport.

Availability of transport

31. As Council has noted in past submissions[4], many transport-disadvantaged residents are concentrated in the north of Kāpiti – particularly in the Ōtaki area – where household incomes are lower and public transportation is less prevalent.

32. To assist the transport disadvantaged in this area, greater investment is required. These residents would benefit from additional bus runs during peak and off-peak

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[2] For example, the Roads of National Significance; the Cycleway, Walkways and Bridleways; the Park 'n Ride facilities in Paraparaumu and Waikanae; and the partnerships with Horizons Regional Council to maintain the Capital Connection and introduce the Levin-to-Waikanae bus service.

[3] Examples of new technologies include integrated ticketing across the whole Metlink network; real time information boards; and a new environmentally sustainable fleet.

[4] See: Kāpiti Coast District Council. 18 April 2017. *Submission on the GWRC Annual Plan 2017/18*; Kāpiti Coast District Council. 29 July 2016. *Submission on Better bus services for Kāpiti*; Ōtaki Community Board. 29 July 2016. *Submission on Better bus services for Kāpiti*; Kāpiti Coast District Council. 18 April 2016. *Submission on changes proposed for the GWRC Annual Plan 2016/17*; and Kāpiti Coast District Council. 20 April 2015. *Submission on the GWRC Draft Ten Year Plan.*

hours, improved northwards and southwards transportation services (bus and train), and more bus shelters.

33. Council recognises that steps have been taken in recent years to improve bus runs, particularly in Ōtaki during peak hours. But, while these peak hour runs are important for commuters, they have been provided by pulling buses from off-peak runs rather than through increased investment. As such, Ōtaki residents who require public transportation to travel to basic community activities and services during off-peak hours are disadvantaged.

34. Similarly, the lack of transportation to Levin creates a barrier for those who need to access services in Horowhenua. Council has been pleased to see the Levin-to-Waikanae bus service trial, but the timetable makes it clear that this service is geared towards bringing Levin residents to Ōtaki and Waikanae for the day, rather than helping Ōtaki residents travel north to Levin for the day.

35. Another issue that remains is the need for additional infrastructure (e.g. bus shelters) in Ōtaki to support the bus service. Ōtaki does not appear to have the same amount of bus shelters per capita as other areas in the District. For our most vulnerable bus riders, this is genuinely challenging. The Ōtaki Community Board and GWRC have discussed this concern on many occasions, but the situation persists.

36. There is also a strong need for improved rail services because the rail service north of Waikanae is extremely limited. Residents would benefit from improvements, particularly for commuters traveling south into Wellington or north towards Palmerston North. Council notes that GWRC recognises this need for improved rail services, and is pleased to find consideration of long-term solutions included in the consultation document, *Investing in our extraordinary region.*

37. In the consultation document, GWRC asks for feedback on the options proposed for improved rail services on the Wairarapa and Capital Connection lines (p15). Council appreciates the contribution GWRC has already made to maintain the Capital Connection, and is pleased to see the Capital Connection considered within GWRC's proposed LTP. Council supports any option that would maintain and extend the service. Whilst Council recognises that Option 1A is reliant on a significant amount of funding from central government, Council still supports Option 1A as the preferred option because the alternative Option 1B would not lead to increased service levels for quite some time (p15).

38. Council would like to see increased rail services north of Waikanae during peak and off-peak hours. Council would like to see the electrified tracks extended north of Waikanae. In the short term, however, Council would be pleased to see the introduction of hybrid (diesel electric) engines. As a number of these projects may require significant investment from GWRC's partners, Council would be willing to participate in the development of any business cases supporting the development of these projects.

Cost of transport

39. Council notes that progress has occurred on the establishment of a single ticketing system and understands that a series of new concessions will now be

offered. However, as argued in Council's *Better Metlink Fares* submission, Council is concerned that the cost of these concessions falls too heavily on residents who are on low or fixed incomes, SuperGold Card holders and occasional users.[5]

40. SuperGold Card holders can access reduced fares during off-peak hours, but this means that off-peak bus runs must be available. Meanwhile, for low or fixed income residents that are not SuperGold Card holders, there do not appear to be any special concessions (unless they happen to qualify for another type of concession). Because Kāpiti is home to a large proportion of low income residents and SuperGold Card holder residents, the new fare structure seems like it will further disadvantage a large proportion of Kāpiti residents.

41. In addition, Council notes GWRC's intention to extend Snapper in July 2018 and wishes to remind GWRC that it is important that the infrastructure to access Snapper cards is in place before the transition actually occurs. There are currently no outlets in the Kāpiti Coast District that sell Snapper cards; while Snapper Cards can be accessed online, there are some Kāpiti residents that do not have internet access.

PUBLIC TRANSPORTATION

- Residents north of Waikanae would benefit from:
  - additional bus runs during peak and off-peak hours,
  - improved northwards and southwards transportation services (bus and train), and
  - more bus shelters.
- Council is concerned that the new fare structure will further disadvantage Kāpiti residents, particularly SuperGold Card holders and low income residents. Council would like to ensure that sufficient transportation is offered during off-peak hours to ensure that SuperGold Card holders can access their concession, and Council would like concessions offered for low income residents.
- Council supports OPTION 1A, the long-term solution for the Wairarapa and Capital Connection lines.

Regional Resilience & WREMO

42. Council recognises the important role GWRC plays in readying the Wellington region for adverse events, and Council is generally pleased with the WREMO model.

43. Of the two potential WREMO funding models proposed in the consultation document (p17), Council supports Option 2A which would provide increased funding to WREMO.

44. As for the other projects that seek to increase regional resilience (e.g. The RiverLink flood management programme and the Lifelines project), Council would

[5] Kāpiti Coast District Council. 12 September 2017. *Submission to Greater Wellington Regional Council on Better Metlink Fares.*

also encourage GWRC to recognise the importance of the Kāpiti airport in the wider resilience strategies of the region. Council would be keen to see GWRC promote the airport as a key component in regional readiness, response and recovery plans.

REGIONAL RESILIENCE

- Council supports Option 2A, which would provide increased funding to WREMO.
- Council would like GWRC to include the Kāpiti airport in regional readiness, response and recovery plans.

Flood protection

45. Council wishes to emphasise our ongoing issues related to flood protection and control. A significant portion of our storm water network is already over capacity. The Kāpiti District has been growing steadily for quite some time, and these growth projections are forecast to continue into the foreseeable future, putting further pressures on the storm water network.

46. Our Council has developed a long-term plan proposal to maintain and upgrade the existing storm water network over the next 45 years, while also preparing to accommodate the new growth. Council would like to ensure that we are working alongside GWRC to ensure that any future flood protection and control works carried out by GWRC can be incorporated into our planning frameworks.

47. Specifically, Council would like to know more about the specific flood protection projects planned for Kāpiti over the course of this LTP. Council notes GWRC's intention to implement the Ōtaki and Waikanae flood management plans and environmental strategies over the next 10 years (Supporting information, p80), but would like more detailed information about any specific projects planned for those rivers over the next 10 years as well as any further plans for other waterways such as the Mangaone, Waimeha, Rangiuru, Mangapouri, Waitohu and Ngatotara streams.

48. Outside of recent works on the Jim Cooke Park stopbank as well as regular ongoing maintenance works in parts of the District, Kāpiti is not aware of any other detailed plans for the District. Council acknowledges that this is likely because other areas in the Wellington region are deemed to be of higher risk. Just to ensure that Council understands where Kāpiti sits within the long-term flood protection and control plan for the entire region, Council would appreciate more information on how hazard identification and assessment is measured.

Resource management

49. Council notes that 'freshwater quality and biodiversity' and 'regional resilience' are both identified as key priorities for GWRC (Supporting information, p13 & 15).

50. As Council has argued in past submissions[6], Council appreciates GWRC's mandate to ensure protection of the natural environment – particularly in relation to freshwater quality and biodiversity – but argues a more practical approach for the consenting of open storm drainage channels is required because this is fundamental to resilience. As GWRC is aware, the inability to clear these channels in a timely manner on a regular basis contributes significantly to the flood risks in our communities. As GWRC states, 'floods are one of [the Wellington region's] most significant natural hazards and have the potential to cause both economic and social hardship' (p15).

51. This issue has been discussed repeatedly between our two Councils over several years, but a solution has not yet developed. A solution must be reached, so Council requests GWRC's commitment to this process.

52. The development of a whaitua committee for Kāpiti would be helpful in addressing this issue because the committee would make decisions on the future of land and water management in Kāpiti. Within the supporting information Council does not find any specific information on the development of a whaitua committee for the Kāpiti Coast over the next ten years. Council has requested more certainty on when this will occur in a number of past submissions.[7]

FLOOD PROTECTION

Council requests:

- further information on the management of waterways such as the Mangaone, Waimeha, Rangiuru, Mangapouri, Waitohu and Ngatotara streams;
- more information on how flood hazards are identified and assessed throughout the region;
- a more practical option to consenting for the open storm drainage channels, which are important to the natural environment while also providing a vital flood protection role for both public and private property; and
- more certainty on plans to establish the Kāpiti whaitua committee.

Climate Change

53. Council is surprised to note that, while the consultation documents (including supporting information) mention climate change as a significant issue for the region, there is not more of a focus on GWRC's proposed programme of work related to climate change and natural hazards.

54. In our *Long Term Plan 2018-2038*, Council has identified 'an effective response to climate change in Kāpiti' as one of our key outcomes.

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[6] Kāpiti Coast District Council. 18 April 2017. *Submission on the GWRC Annual Plan 2017/18*; Kāpiti Coast District Council. 29 July 2016

[7] See: Kāpiti Coast District Council. 18 April 2017. *Submission on the GWRC Annual Plan 2017/18*; Kāpiti Coast District Council. 18 April 2016. *Submission on the Changes Proposed for the GWRC Annual Plan 2016/17*; and Kāpiti Coast District Council. 20 April 2015. *Submission on the GWRC Draft Ten Year Plan.*

55. In terms of mitigation, Kāpiti Coast District Council has been CEMARS certified since 2012, and continuously seeks new ways to reduce greenhouse gas emissions across Council activities.

56. In terms of adaptation, Council intends to initiate a programme in 2018 to work with the community to identify the key issues and risks of climate change, develop provisions for adoption in the district plan as required, and identify preferred management options for Council activities under different climate change scenarios. Because coastal hazards are of particular concern in Kāpiti, it is intended that this work will initially focus on coastal hazard management.

57. It is important that Council work alongside its regional partners as it undertakes this work, particularly in relation to coastal hazards. Council was pleased to adopt the Natural Hazards Management Strategy (NHMS) for the Wellington Region and actively participates in all of the regional climate change and natural hazard-related forums.

58. It is likely that the implementation of the NHMS will progress very slowly without further support from GWRC, which could undermine the ability of the councils to align their activities in these areas. For this reason, Council requests that GWRC consider an increase to the resources allocated to GWRC's climate change and natural hazards work programmes. GWRC needs to play a very important role in the development of regional alignment across these complex and challenging issues.

CLIMATE CHANGE

- Due to the important role GWRC plays in the development of a regional response to climate change and natural hazard management, Council requests that GWRC consider an increase to the resources allocated to GWRC's climate change and natural hazards work programmes.

Economic development

59. In the consultation document, *Investing in our extraordinary region*, the Wellington Regional Strategy is defined as the regional economic development plan, carried out by the Wellington Regional Strategy Office and WREDA. The document goes on to explain, however, that WREDA is 'a joint council controlled organisation of Greater Wellington and the Wellington City Council, [which] also undertakes tourism, major events and venues activities for Wellington city' (p11).

60. Council would like detailed information on the proportion of WREDA funds that are spent on economic development activities outside of Wellington City. Council recognises that Kāpiti benefits from activities across the region (in terms of increased tourism, employment opportunities, and events), but Council is not convinced that the Wellington Regional Strategy Office and WREDA are doing enough outside of Wellington City. Council would expect to experience a contribution to economic development in our Region that exceeds our financial contribution, due to the ability of WREDA to leverage economies of scale and scope.

61. Council acknowledges that approximately $500,000 of the rates paid by Kāpiti residents is directed towards WREDA, and Council questions whether this is the best use of this money. Council would like to see a regional economic development model that is more agile and able to react quickly to emerging issues, while also progressing other long term projects across the region. For example, Council would like to see further promotion of its airport and more assistance in the development of the Kāpiti Island Gateway project.

62. Council acknowledges that such a discussion might align well with GWRC's signal that it intends 'to review how we invest in regional economic development to achieve the best outcomes for the region' (p20). Council looks forward to participating in that review.

ECONOMIC DEVELOPMENT

- Council would like GWRC to demonstrate, through quarterly and annual reporting, WREDA's contribution to economic development in Kāpiti.
- Council would also like:
  - detailed information on the funding that is spent on economic development activities outside of Wellington City;
  - a regional economic development model that is more agile and able to react quickly to emerging issues, while also progressing other long term projects across the region;
  - further promotion of existing resources, such as the Kāpiti airport; and
  - more assistance in the development of new projects, such as the Kāpiti Island Gateway project.
- Council notes GWRC's intention to review its strategy for investment in regional economic development to achieve the best outcomes for the region, and looks forward to participating in that review.

Points of clarification

63. Council notes that in the Supporting information's chapter on water supply, GWRC writes that one of the priorities for water management is to develop 'a regional asset management plan for water infrastructure' (p59). Council assumes that the asset management plan is not for the region, but rather for the 5-councils of Wellington City, Lower Hutt, Upper Hutt, Porirua and Greater Wellington. Council requests clarification on this point.

64. The draft Infrastructure Strategy identifies a large spike in infrastructure spending from 2041 to 2044, and notes that these peaks 'represent large investment' (p16). Council request further information about those investments. In general, Council would appreciate further detail throughout the draft Strategy on planned spending across each of the councils in the Wellington Region.

Conclusion

65. We would like to speak to our submission at the hearings.

66. We are aware that there are other groups in Kāpiti that will be making their own submissions. Therefore, we request that a hearing be scheduled in Kāpiti so that all submitters from the Kāpiti Coast District, including those that may be unable to travel to Wellington for a hearing, are able to participate in the hearings process.

67. Kāpiti Coast District Council appreciates the opportunity to comment on the draft *GWRC Long Term Plan 2018-2028*.

Yours sincerely

Max Pedersen
ACTING CHIEF EXECUTIVE