

4 May 2018

Bryn Gandy  
DCE, Strategy and Investment  
Ministry of Transport  
P.O Box 3175  
**WELLINGTON 6140**

Dear Bryn

### **Government Policy Statement on Land Transport 2018**

1. Thank you for the opportunity to submit on the draft Government Policy Statement on Land Transport (GPS) 2018. This is our final submission, having been finalised and improved by our Strategy & Policy Committee at their meeting on 3 May.
2. Kāpiti Coast District Council (Council) supports the submissions from Greater Wellington Regional Council (GWRC) and Local Government New Zealand on the draft GPS 2018. Council fed into the development of GWRC's submission via its participation in the Wellington Regional Transport Committee.
3. Council would like to take this opportunity to write to the GPS Policy team about a number of issues that are of particular interest to the Kāpiti Coast District.
4. In principle, Council supports the strategic priorities identified in the draft GPS, and particularly the increased focus on reducing emissions and promotion of active modes. Council recognises the need to improve road safety and contends that (i) improving access through better land use and transport planning and (ii) the consideration of all modes of transport (including multi-modal options) are key to ensuring successful urban centres, as well as enabling better environmental outcomes.

### **Safety**

5. As with national trends, the Kāpiti Coast District has seen the number of serious and fatal crashes increase over the previous 5 years. The Kāpiti Coast District has been identified by NZTA in their (national) Communities at Risk Register as having a very high risk rating for cyclist and pedestrian crashes. Intervention is required and Council supports the priority given to safety in the GPS.
6. Council looks forward to a new road safety strategy, including the introduction of Vision Zero. It is important that local authority knowledge on local issues and challenges should inform the development of the strategy and the decision

making process, so Council wishes to participate in the development and implementation of the strategy.

7. Council is currently reviewing local speed limits in accordance with the Speed Management Guide, but thinks it should be recognised that speed limit changes very often need to be complemented by physical safety improvements, for which improvements funding will have to be available.
8. Apart from the above measures to improve safety on our roads, Council thinks that reconsideration of New Zealand's driver education programmes and licensing regimes to ensure highly-skilled New Zealand drivers should be part of the overall programme towards safer roads. Sufficient policing is also key to reducing unsafe driving practices. Council is pleased to note that the GPS makes specific comments about supporting investment in effective enforcement to promote safe behaviour by road users on page 10.
9. Council considers that, in order to support the implementation of road safety initiatives and new policies that might need to be developed, increased funding assistance needs to be made available to support additional resourcing within councils.

#### **Access**

10. Council supports mode neutrality and mode neutral investment and agrees that consideration should first be given to ensuring the best use of existing infrastructure, before investing in new. However, there are areas where infrastructure does not exist or is substandard, especially in relation to walking, cycling and public transport. In some of the Kāpiti Coast District's rural areas, there are no footpaths, cycleways or public transport available, and significant investment would be needed to achieve modal shift. Overall, there is an increased need for alternative modes to the private car.
11. Alternative modes to the private car are important for environmental protection, resilience against increasing weather events and other natural hazards affecting the local network and the provision of viable transport options to all members of society. Kāpiti Coast District Council has a proportionately high level of elderly residents and many residents (of all ages) who are physically challenged. Council supports the use of the New Zealand Disability Strategy and the World Health Organisation's *Global Age-friendly Cities: A Guide* to inform such programmes of work.
12. Council supports the recommendation in the GWRC submission that the GPS provides explicit encouragement for joint programmes of investment across activity classes to develop integrated transport programmes that support land use outcomes (e.g. transit oriented development)
13. Whilst Council understands that there should be some focus on metropolitan and high growth areas, this should not be at the expense of other areas. Some medium growth areas will have similar transport challenges to high growth areas. As a Council that is looking at higher growth, we have argued for improved public transport in the Kāpiti Coast District because the demand for services and usage of our local road network will continue to increase as a result of the new



expressways, creating a number of challenges on our local networks. In addition, Council contends that low and medium growth areas may even require additional focus because reliable transportation networks are fundamental to economic development and access to employment options, which can be particularly important outside of metropolitan centres.

14. Council welcomes the Provincial Growth Fund. The rural economy and tourism make significant contributions to the Kāpiti Coast District's economic base so we look forward to exploring the opportunities that may be afforded to Council through this process.
15. Council agrees that technological advances have the ability to enable virtual access and inform transport choice, but this must be supported by organisational change and the infrastructure delivery, such as fibre optic broadband.

### **Environment**

16. Council supports the reduction of emissions from transport through mode shift, public transport and better integrated transport and land use planning. This is consistent with Council's strategic outcomes and goals, and our vision to create a transport network that enables people to act in a sustainable way
17. In regard to environmental mitigation as part of reporting back on investment, Council would like to understand what 'clear reporting' on investment means, who will be expected to report, and whether there be resource available to achieve this.

### **Funding**

18. Whilst Council supports an increase in funding over the next 6 years to 2023/24, Council is concerned about the ability to meet the expected local share and notes that the draft GPS identifies an increase in local share to \$1.5bn, compared to \$1bn in the February 2017 draft GPS. This is an increase of 50%. For the Kāpiti Coast District, with a growing elderly population on fixed incomes, affordability is an ongoing and major issue when developing infrastructure programmes and budgets. Such an increase will further impact these challenges. As with GWRC, we consider that a review of wider funding policies, including the Funding Assistance Rate (FAR), is necessary to address issues around constrained local share funding.
19. Council requests further consideration of how the relationship between different funding streams (such as the Regional Development Fund, NZTA, and the Provincial Growth Fund) can support local authorities in the delivery of local and regional schemes. The government should work with local government to review local government funding tools to ensure a sustainable long term approach to funding infrastructure. Part of this discussion needs to be the misalignment in timing of funding processes between the Local Government Act 2002 (Long Term Plan budgets) and the Land Transport Management Act 2003 (RLTP/NLTP).
20. Council strongly supports the inclusion of footpath maintenance in the GPS as currently footpath renewal and maintenance is not funded. Council has requested funding for footpaths for the 2018-21 funding period and has written to the

Minister by letter of 17 November 2017 to seek support for a change in funding policy.

21. Council also supports GWRC in recommending that consideration is given to how NZTA's Investment Decision Making Framework, including the Economic Evaluation Manual, could incentivise improved environmental outcomes, and other outcomes such as safety and resilience. Council thinks that more clarity is needed, in particular in relation to public transport, when projects require investment that span across district and regional councils. When this occurs, it can be difficult to clarify where funding responsibilities lie. A case in point is the Capital Connection, which runs between Palmerston North and Wellington City. After many years of deliberation, Horizons Regional Council and Greater Wellington Regional Council developed a joint-funding arrangement, but it is set for only a limited time period.

### **General comments**

22. Council agrees with the need to better align transport and land use planning but notes that other legislative change may be required to realise this. We agree with GWRC that the linkages between the Land Transport Management Act 2003 (LTMA), the Resource Management Act 1991 (RMA) and the Local Government Act 2002 (LGA) are poor and pose a significant barrier to greater integration.
23. In particular, the RMA can often create inflexibilities in the District Plan development process that make changes difficult to achieve without a plan change process, which is resource intensive and time consuming.
24. We are also supportive of the recommendation made by GWRC in relation to the need for a stronger focus on resilience. Climate change, as well as the earthquake in November 2016 and a number of land slips, has demonstrated that there are important risks and challenges that need to be addressed. The aim is to increase resilience in the roading network and develop systems whereby damaged infrastructure can be quickly repaired, while also providing alternative transport options to reduce reliance on infrastructure. While these aims appear to be at odds, they both need to be considered because, in some cases, resilience and the ability to attain business as usual as quickly as possible after an event will mean that new infrastructure can be as important as mode shift.
25. Council is keen to understand how investment in rail, air, and sea freight movement will be considered. In Council submissions to GWRC and NZTA, we have repeatedly requested an extension of electrification of rail services north of Waikanae. Council feels there is a need to clarify expectations on how NZTA will engage in this coordination with Kiwirail and other providers, as well as the expectations for local authorities. How will this work in practice, and how will it be measured?

### **Conclusion**

26. Kāpiti Coast District Council appreciates the opportunity to comment on the draft Government Policy Statement on Land Transport (GPS) 2018.

27. We would like to speak to our submission at the hearings and we thank you for considering our feedback.

Yours sincerely



Wayne Maxwell  
**CHIEF EXECUTIVE**