

## **BY EMAIL**

15 September 2023

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### **Submission of Kapiti Coast District Council to:**

#### ***Te Tauāki Kaupapa Here a te Kawanatanga mō ngā Waka Whenua* Draft Government Policy Statement on Land Transport 2024/25 – 2033/34**

The Kapiti District Council thanks Te Manatū Waka – Ministry of Transport for the opportunity to comment on the Te Tauāki Kaupapa Here a te Kawanatanga mō ngā Waka Whenua, draft Government Policy Statement on Land Transport 2024/25 – 2033/34 (GPS).

Kapiti District Council is a peri-urban council situated on the north-west coast of the Wellington region. Our district is experiencing significant growth and is developing from a dormitory ‘suburb’ to Wellington, to a district with a growing commercial and services sector. In recent years improved north-south linkages through improved rail services north to Waikanae and the opening of the expressways from Mackays Crossing to Ōtaki and the Transmission Gully motorway, have significantly strengthened the district linkages to Wellington, making Kāpiti attractive to people seeking lifestyle changes and housing choice.

### **Strategic priorities**

In 2022 Council adopted a Sustainable Transport Strategy (Strategy). The Strategy takes a long-term view, out to 2035, in shaping the future of transport in the district, and provides a framework for guiding transport investment in Kāpiti, and a basis for engagement with all transport stakeholders. The Strategy’s principles of sustainability for the transport network include: equitable access for all; and a system that can cope with change, integrating transport and land use, and avoiding, remedying, or mitigating impacts on the environment. These principles parallel the strategic priorities outlined in the draft GPS to support environmental sustainability, resilience and security, economic prosperity, access, and healthy and safe people.

Drawing on the Strategy and supporting its own forward strategy for Access and Transport, initial submissions to the 2024-2027 National Land Transport Programme and Regional Land Transport Plan, and Council’s own 2024-2027 Long-term Plan, Council identified six ‘problem statements’. These problem statements closely align with the Strategic Priorities identified in the draft GPS (Table 1).

**Table 1**

| <b>Council Access &amp; Transport Problem Statements</b> | <b>Strategic Priorities for GPS 2024</b> |
|--|--|
| Connectivity   | Freight                                  |
| Fit for Purpose network                                  | Maintaining & operating the system       |
| Demographics and accessibility                           | Sustainable urban & regional development |
| Resilience and Climate change                            | Increasing resilience                    |
| Carbon reduction   | Reducing emissions                       |
| Road safety  | Safety                                   |

We support the proposed Strategic Priorities as we believe they will guide investment decisions by Waka Kotahi NZ Transport Agency (Waka Kotahi) and its co-investment partners, including local authorities such as our Council, towards the areas of focus we agree are of highest priority.

### **GPS outcome**

The section covering the Strategic Priorities also sets out the draft GPS' contribution to transport outcomes. However, in the description of these contributions there is nothing to demonstrate how the draft GPS is intended to 'shift the needle' on many of these outcomes. This makes it difficult for Council to tie its own planning direction, efforts, and advocacy through to the local, regional, and national transport planning hierarchy, for decisions on priority of investment.

With the recent passing of the Natural and Built Environment Act and the Spatial Planning Act, and with the first regional spatial strategies due mid-2027, Council would have expected some recognition of what this new planning environment may mean to ongoing prioritising of projects and funding. Transport is a clear enabler of many of the outcomes we are seeking to improve at a local level, and this uncertainty leaves a large gap in our ability to deliver the improvements needed to support housing, health, connection, tourism and local economic development.

References to resource management drivers throughout the document are limited to the NPS-Urban Development and the Medium Density Residential Standards. While these will continue to be important drivers in urban planning and development, longer term indications as to how the GPS will respond and fit with the new regional spatial strategies would be invaluable.

### **Constraints and effectiveness**

Some documentation in the draft GPS on its planning and forecasting assumptions against which expenditure allocations can be judged would be useful. With an overall increase from all sources of 34%, the impact of that increased funding on achieving better levels of service and new infrastructure is difficult to judge. With roading costs increasing by 24 percent over the next ten years, and transport costs increasing by 23 percent<sup>1</sup> it is difficult to gauge overall effectiveness of

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<sup>1</sup> From Taitaura: Local Government Professionals Aotearoa, prepared by BERYL.

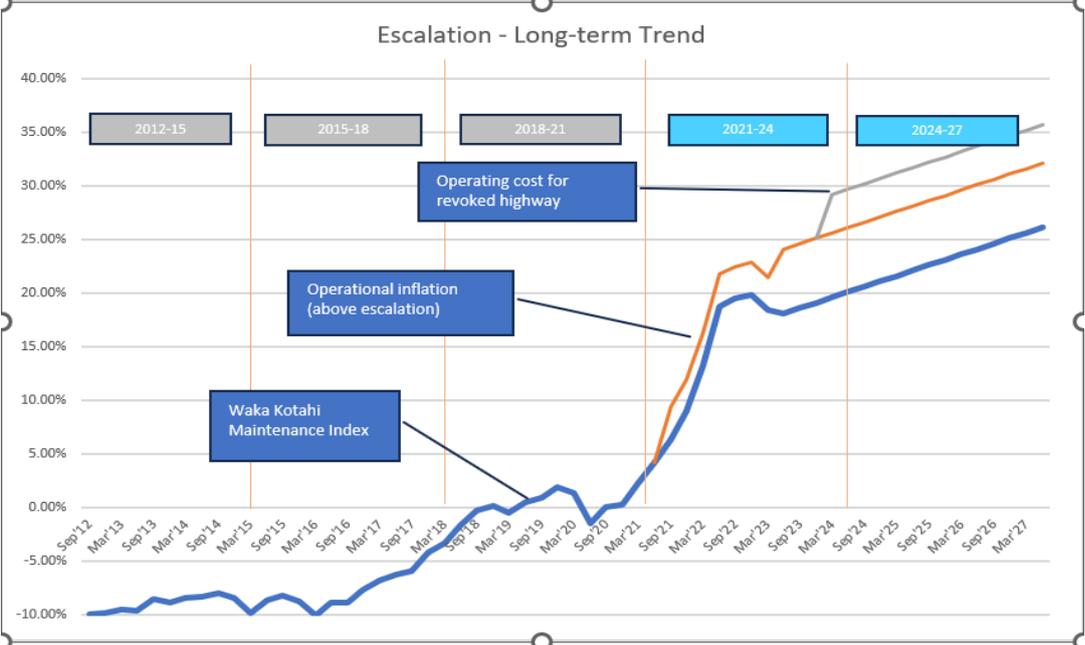
the identified prioritisation of funding, particularly where some output classes are ‘straight-lined’ in outer years. Without this information it is difficult to make an informed assessment of the GPS, its impacts, and its likely effectiveness.

**Capacity, cost, and effectiveness**

While agreeing the role of Waka Kotahi in operationalising the GPS, some allocation of responsibility for the Ministry as steward of the overall transport system, to grow the sector’s capacity (workforce numbers) and capability (available skills) is paramount and should be explicitly captured as a priority, particularly in meeting the Minister’s expectations, (and the sector’s needs). While currently stated as an expectation of Waka Kotahi to “demonstrate how it is investing and collaborating with the sector to build capability...”, it is an appropriate task of the Ministry, as system steward, to take responsibility to affect immigration, education, and skills policy.

The condition of our roads (state and local networks) is for the public, one of the clearest indicators of value for money. The draft GPS has maintenance and operation of the network as one of its strategic priorities with an increase in investment of 30%. As noted above, a predicted increases in roading costs and an 1-2% growth in traffic across the network, over the life of the GPS, would suggest this funding increase may barely maintain the status quo in service levels. Indeed, for the local network within our own district, inflationary costs easily match a 30% increase in funding levels (Fig.1, below: Kapiti Coast District Roding Long-term cost trends).

**Fig. 1: Kapiti Coast District Roding Long-term cost trends**



**Strategic Investment Programme**

Council supports the increases in funding both through the NLTF and direct Crown appropriation. Within the caveats expressed above, the increases in local road maintenance and local road improvements will be severely impacted by current inflationary pressures and will need to be revisited during the currency of the draft GPS to ensure that funding remains sufficient to make headway in improving levels of service, or at the very least, not allowing them to slip further.

**Comments on fund allocation**

Council notes that the NLTF is augmented by direct Crown funding from a number of sources. This funding includes the New Zealand Upgrade Programme (NZUP), which includes funding for

the proposed new highway from Ōtaki to North of Levin (O2NL). While the draft GPS lists a number of the projects in the NZUP, it does not list the O2LP. Council would like to see this project explicitly itemised. The new highway would link Ōtaki, the northern-most town in Kāpiti district through to Horowhenua and Levin, which is a major service centre for this part of our district for health, education, and jobs.

For Kapiti district and its residents, rail services are central to many peoples commuting and social activity. As noted above, the northern part of our district is particularly poorly serviced. Investment via the Rail Network Investment Plan (RNIP) in improving cross regional services (Palmerston North to Wellington), electrification for a commuter service north to Levin, to include Ōtaki in passing, is for our district a strategic priority. Similarly, for this northern area of our district, the Inter-regional public transport funding is vital to augment what are currently very basic services. It would be useful for the GPS to have greater expectations for regional government, around:

- Ensuring Public transport priorities ‘shift the needle’ on issues specific to vulnerable communities, so that ‘quick wins’ for these communities are a stated priority from the outset. This is a significant gap in the system presently on the basis of regional priority, rather than local need. The most vulnerable communities are left the worst off, with Ōtaki and Te Horo as a key example in the Kāpiti district.
- Addressing the gaps between regional boundary areas and whether there is need for stronger national direction around regions working to meet the needs of New Zealand rather than, in places, an ill-defined boundary point. An example is Ōtaki, where the majority of Wellington regions public transport ends at Waikanae, whilst Horizons (for the Manawatu region) ends at Levin. Transport for passengers and freight movement requires national connection, which is not blocked by regional cutoff points. Perhaps new approaches focused on corridor connectivity could be considered as an improvement to regional activity (for example, the Western connectivity corridor in the North Island). Cross-regional goals could be set through the GPS to achieve this.

Finally, in terms of connectedness, and sustaining community wellbeing, we note that in funding allocations for the O2NL, an initially promised provision for a bridle path as part of an accompanying walkway/cycleway seems to have been rescinded. Funding from the NZUP has a wider wellbeing ambit than that from the NLTF. Such facilities for our rural population align with the GPS’s “Inclusive Access” and “Healthy and Safe People” transport outcomes. For our semi-rural communities that the O2NL bridle facility would serve, this is an amenity of particular importance to their wellbeing. For provincial and peri-urban districts, the GPS needs to provide a stronger commitment to acknowledge and support the needs of rural areas and to empower their ‘sense of identity’ and connection as a community.

### **Support for the Submission from the Wellington Regional Transport Committee (RTC)**

Generally, Council supports the submission to the draft GPS from the Wellington Regional Transport Committee, and would like to emphasise some of the points made around funding, namely:

#### *National Land Transport Fund (NLTF) funding drop-off and level of debt incurred.*

- In considering the overall NLTF programme, Council agrees with the RTC concern about the funding pathway proposed in the Draft GPS 2024. The increase in NLTF funding proposed between 2024/25 and 2026/27 is welcomed. However, Table 3 in the Draft GPS shows a significant drop from \$7.75 billion in 2026/27 to \$5.4 billion in 2027/28. Given the uncertainty also surrounding when the major projects in the Strategic Investment Programme will

commence and require funding, the RTC recommends that more consideration be given to smoothing NLTF funding over the next 10 years rather than focusing on a short-term funding spike over the next three years.

- Council also shares the RTC's concern at the level of debt proposed and the ongoing impact this may have on the NLTF's future ability to fund the ambitious Strategic Investment Programme proposed, the increased importance of funding additional public transport services and active mode networks to decrease VKT and help deliver the transport emission reductions of the Government, or meet unforeseen contingencies such as continued inflationary pressures or major severe climatic events.
- Council also shares the RTC's concern that this funding arrangement may lead to increased pressure on local and regional councils to increase their funding shares for public transport services, new and improved local roading projects, improving resiliency of local transport networks and maintaining existing local roads – further overextending the already constrained financial environments in which territorial authorities are operating.

*The future of transport funding*

- As outlined above, Council shares the RTC's concern about the drop in NLTF expected revenue beginning in 2027/28, particularly when considering the level of debt that the NLTF is assuming after this triennium. We emphasise the urgency for the Government to complete a comprehensive review of the future of transport funding to smooth NLTF revenue over a longer period of time.

Thank you again for this opportunity to comment on the draft 2024/2025 to 2033/2034 draft Government Policy on Land Transport.

Yours sincerely



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