

Chairperson and Committee Members
STRATEGY AND POLICY

3 MAY 2018

Meeting Status: **Public**

Purpose of Report: For Decision

**SUBMISSION TO THE MINISTRY OF TRANSPORT ON THE
DRAFT GOVERNMENT POLICY STATEMENT ON LAND
TRANSPORT (GPS) 2018**

PURPOSE OF REPORT

- 1 This report requests approval of the submission to the Ministry of Transport (MoT) on the draft Government Policy Statement on Land Transport (GPS) 2018 (Attachment 1).

DELEGATION

- 2 As per section 6 of the Standing Orders, the Strategy & Policy Committee has the authority to approve submissions on behalf of Council.

BACKGROUND

- 3 On 14 March 2018, MoT released the draft GPS, which sets out the government's priorities for expenditure from the National Land Transport Fund over the next 10 years. The priorities set out in the GPS are given effect to by the NZ Transport Agency and taken into account by councils when making transport investments.
- 4 The submission was due on 2 May 2018. At this time, Council officers have submitted an interim submission and clarified to MoT that a final submission will be provided once the Strategy & Policy Committee has had this opportunity to review and accept the submission.
- 5 Through participation in the Regional Transport Committee, this Council's Access & Transport team have participated in a series of workshops and special sessions with MoT on the draft GPS and attended a Transport Summit with the Minister of Transport, the Honourable Phil Twyford, on 16 April.
- 6 Greater Wellington Regional Council (GWRC) and Local Government New Zealand (LGNZ) are also making submissions, and officers from this Council's Access & Transport team have fed into those draft submissions.

ISSUES

- 7 The most significant point to note about the draft GPS is that it shifts the focus of investment in land transport towards new strategic priorities that demonstrate 'this Government's commitment to safety, liveable cities, regional economic

development, protecting the environment, mode neutrality, and to delivering the best possible value for money¹.

- 8 The GPS' four strategic priorities are safety, access, the environment, and value for money. Themes to assist understanding of how to effectively deliver on the priorities include a mode neutral approach, incorporating technology and innovation, and integrating transport and land use.
- 9 The attached submission is generally supportive of the GPS, however, in our submission, we comment on matters that are of particular importance to Kāpiti such as issues relating to funding and resilience, and the connection between the GPS and the RMA (given the requirement to better integrate transport and land use planning).
- 10 Of greatest concern from a funding perspective is the ability for Local Authorities to fund their local share of transport schemes. It is why, in the attached submission, the Ministry has been asked to consider changes to the Funding Assistance Rate as well as working with Local Authorities to explore other funding opportunities.
- 11 The response also considers that investment in metropolitan and high growth areas should not be at the expense of medium growth areas.
- 12 With regards to resilience, it is considered that a stronger focus is required as experiences of events such as the November 2016 earthquake has demonstrated that the ability to return to business as usual as quickly as possible is fundamental.

CONSIDERATIONS

Policy considerations

- 13 There are no policy considerations for this submission.

Legal considerations

- 14 There are no legal considerations for this submission.

Financial considerations

- 15 There are no financial considerations for this submission. However, of significance is the points made in the submission relating to Local Authorities' ability to raise the local share and resource schemes that may be enabled through higher funding levels identified in the GPS.

Tāngata whenua considerations

- 16 There are no tāngata whenua considerations for this submission.

SIGNIFICANCE AND ENGAGEMENT

Significance policy

- 17 This submission is considered to have a low level of significance under Council policy.

¹ Ministry of Transport, GPS 2018 Questions and Answers, p2.

Consultation already undertaken

18 No consultation has been undertaken in the development of this submission.

Engagement planning

19 An engagement plan is not required for this submission.

RECOMMENDATIONS

20 That the Council approve the submission to the Ministry of Transport on the draft Government Policy Statement on Land Transport (GPS) 2018.

Report prepared by	Approved for submission	Approved for submission
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ATTACHMENTS

1 Draft submission to the Ministry of Transport on the draft Government Policy Statement on Land Transport (GPS) 2018.

ATTACHMENT 1

2 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 letter is an interim submission; we will provide our final submission after our Strategy & Policy Committee reviews the submission at their next 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. 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. In addition, 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 hopes that there will be a process by which local authorities have the opportunity to feed into 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. Council considers that, in order to support the implementation of road safety initiatives and new policies to be developed, increased funding assistance should be considered to enable additional resourcing within councils.

Access

9. 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 because of a proportionately high level of elderly residents in the Kāpiti Coast District.
10. 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)
11. 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, for example, will have similar transport challenges to high growth areas. As a medium growth council, we have argued for improved public transport in the Kāpiti Coast District and consider that the demand for services and usage of our local road network will continue to increase in the future as a result of the new expressways, creating a number of challenges on our local networks.
12. 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.
13. 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

14. 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.

15. 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

16. 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. Especially 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. 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.
17. 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).
18. Council strongly support 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.
19. 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.

General comments

20. 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.
21. 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.
22. 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. In some cases, resilience and the ability to attain business as usual as quickly as possible after an event will mean that new infrastructure (which may be underutilised on a day-to-day basis) could be as important as mode shift.

23. Council is keen to understand how investment in rail, air, and sea freight movement will be considered. 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

24. Kāpiti Coast District Council appreciates the opportunity to comment on the draft Government Policy Statement on Land Transport (GPS) 2018.
25. 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