

30 April 2021

Daran Ponter  
Chair  
Greater Wellington Regional Council  
P O Box 11646  
Manners Street  
WELLINGTON 6142

Dear Mr Ponter

**Kāpiti Coast District Council submission on the Greater Wellington Regional Council (GWRC) 2021-2031 Long Term Plan**

Thank you for the opportunity to submit on *The Great Wellington Regional Story: Long Term Plan 2021-2031* (the Consultation Document). These processes allow us to reevaluate how we can do better. Our focus and mechanisms may differ, but we share many of the same goals. The environments and times we are operating in are more challenging than ever, collaborative working is vital to deliver better results for our communities, faster.

Council supports the overall focus of the Consultation Document, to protect and enhance our area while securing our region's future, and are particularly pleased to note commitments to:

- take a leading role in climate action and a sustainable recovery following COVID-19
- work closely with mana whenua towards the best outcomes for Māori in the region, and
- partner closely with territorial authorities in the region.

Significant growth is forecast to occur in Kāpiti and we need to ensure that all plans support a coordinated and integrated approach to shaping growth and development across the district.

Our first comments and questions are focused on the infrastructure and services needed to support the coming population growth in our region, in particular, in relation to:

- working together cohesively to ensure plans are aligned
- improvements in the public transport network for Kāpiti, particularly for our Ōtaki ward
- the portion of costs falling to our Kāpiti residents.

Council also has some comments on climate change and coastal adaption, and on flood protection and environmental monitoring. We also have some final requests in regard to specific funding for pest control and Ki Uta ki Tai.

**Growth in Kāpiti**

The Kāpiti Coast district occupies a strategic location and plays a critical role in the success of the Greater Wellington Region – whether by accommodating growth with increased provision of housing and work opportunities for Greater Wellington population, or providing strategic access from Wellington to the wider North Island. A number of critical infrastructure projects are taking place in Kāpiti which will change the shape and dynamic of the entire Wellington Region.



The Consultation Document signals an additional 200,000 people in the region in the next 30 years, and the Wellington Regional Growth Framework (WRGF) suggests that 43% of that growth will occur in the Western Corridor from Tawa to Levin. This growth has already started, with development of some major new subdivisions and Kāpiti population figures at the upper end of the region's projections. The WRGF specifically anticipates that the Ōtaki area will be a significant part of that additional housing capacity, both through brownfield densification of existing urban areas, but also greenfield development around its fringes. The WRGF also identifies two major new growth areas, one of which, the Te Horo/Peka Peka Growth area, is also in the north of the District.

### **Working together is vital in our growth environment**

Working well together is important for delivering better outcomes for our communities - and delivering them faster. But Council considers working together and working well is particularly vital in a COVID-19 recovery environment and with the projected growth.

We also strongly support 'Aligning with Government direction' as a strategic priority, with significant legislative reforms in resource management and water supply coming our way.

#### Wellington Regional Leadership Joint Committee

The Wellington Regional Leadership Joint Committee (the Joint Committee) provides a great opportunity to improve how we work together. Regional and local councils have different purposes and levers, but many of the goals we are working towards are shared.

Council recognises the strategic role that GWRC plays in the region, and the challenges involved in coordinating approaches to some of our region's issues and opportunities but it is essential that GWRC understands the distinct needs of each of the region's councils, as well as the common challenges, because each district is unique. The Joint Committee will be a key forum for aligning each parties' individual efforts to provide for more timely and effectual investment in growth overall.

Stronger collaboration will mean we can deliver on our shared goals better and faster. For this reason, Council favors providing serious support for the Joint Committee. A higher level of resourcing for the Joint Committee will maximize the opportunities that the forum provides. A dedicated secretariat will help ensure material used is comprehensive, options fully traverse the cross-boundary issues, and decisions are carried through to implementation.

#### **WORKING TOGETHER**

- Council asks that GWRC recognises the distinct needs of each of the region's councils, as well as the common challenges, because each district is unique.
- Council supports option 1 for 'Taking joint action to super charge our region', and providing serious support the Joint Committee.

### **A public transport network that services all our district's residents, including our outermost suburbs, is a fundamental need now and a key enabler for growth**

If we are to support the level of growth indicated in the WRGF there needs to be a clear and coordinated implementation plan that links the delivery of new development to the delivery of high quality public transport. The improvement of public transport will be key to giving effect to the WRGF 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.

Council generally supports the proposals that expedite the delivery of improved services and a low carbon public transport network, and this is consistent with Council's Sustainable Transport Strategy and the WRGF.



We take this opportunity to raise transport issues of relevance to Kāpiti district. Council wants to ensure that connectivity in Kāpiti is improved particularly to the north, within Ōtaki, from Ōtaki to the north in Horowhenua and south into Kapiti and beyond, and to the railway stations in Ōtaki and Waikanae.

#### Connections in the rail network

The rail network is critical to support growth and encourage mode shift, particularly for commuter journeys within our district and into Wellington City. Currently there is heavy reliance on cars, where over 50% of our workforce commute to work in a car and over 30% of our working residents travel outside of Kāpiti for work. This contributes to transport issues within the district and in Wellington City where emissions, parking and congestion are an issue.

Council has advocated for improved rail services, particularly in the north of our district, for a long time. This will become increasingly important to support the level of growth identified in the WRGF and give effect to the NPS-UD and to capitalise on the opportunities it presents. The North Island rail network is electrified from Wellington station to Waikanae, and also from Palmerston North to Te-Rapa north of Hamilton. There is a strategic opportunity and good reasoning to extend the electrified passenger train network further north in the region.

We note high demand on the Kāpiti Line, with patronage steadily increasing and have seen evidence of a strong recovery post the COVID-19 lockdown. This demand is likely to continue and we support measures to improve rolling stock and infrastructure on the Kapiti Line.

Council has submitted on the Draft New Zealand Rail Plan, our comments included:

- calling for infrastructure improvements and quicker implementation than envisaged
- supporting investment in the Capital Connection service, and to consider that funding for both infrastructure and rolling stock is required to realise service improvements
- acknowledging investment proposals for the Kāpiti Line but seeking that these should be recognised as more than just future opportunities
- supporting full electrification of the North Island Main Trunk Line, and
- cross border complexities should not disadvantage our community and project delivery.

Council understands basis of the proposals relating to the Manawatū Line is that 90% of funding for rolling stock will come from Waka Kotahi. We would be pleased to support GWRC (and Horizons Regional Council) in advocating for the funding to support delivery.

Council looks forward to working together on Station Access Plans and commenting on the Park and Ride Strategy that will be developed alongside the Regional Public Transport Plan. Council has concerns that the introduction of parking charges at Park and Ride sites could be counter-productive. This has the potential to act as a disincentive to public transport use, for commuters (particularly with Transmission Gully opening soon) and for seniors (the cost will have an impact for those who use Goldcard fares to enable them to move around the region). It would also create parking problems in surrounding residential streets and business areas and commuter parking is already over spilling in areas such as Paraparaumu and Waikanae, with some commuters also parking on State Highway 1, and station access improvements are required to encourage the use of alternative modes.

Council also considers that the rollout of a new integrated ticketing solution across the public transport network, including rail services, should remain a priority to ensure seamless journeys by public transport. However, we also ask that Greater Wellington Regional Council consider the appropriateness of staffing at the Paraparaumu and Waikanae station offices. The loss of staffing at Paraparaumu on a Saturday in particular means weekend commuters, especially older commuters, need to walk a significant distance to pre-purchase a ticket if they do not have cash on them.

#### Connections in the bus network

We support measures to decarbonise the bus fleet. These improvements fit with the measures to address Council's climate change emergency declaration, by assisting in reducing



emissions from private motor vehicles. However, there are opportunities to make improvements beyond those already identified. Connectivity across the region and within our district will play a critical part in achieving mode shift both now, and as our population grows.

The Consultation Document is relatively silent on the delivery of services to support growth, beyond identifying that there will be 169 new buses. Council seeks an indication of where these new buses will be running and asks that Kāpiti be supported by some of this increase.

Unless there are significant and programmed improvements to public transport services between the north and the rest of the region through the bus network, there is a risk that the objectives in the Regional Land Transport Plan will not be achieved.

### Public transport in Ōtaki

Our Ōtaki ward lacks a range of services to enable transport-poor residents to connect to other parts of the district and the capital. This makes it particularly difficult for residents who cannot drive, and depend on public transport for their wellbeing. In addition, many residents in the Ōtaki ward look to the Horizons region for services, including health care, employment, financial services, retail and economic opportunities. Ōtaki currently has a low socioeconomic profile and therefore the transport needs of the community are particularly ill-served by the current situation.

To meet the level of growth indicated in the WRGF, there needs to be a clear and co-ordinated plan for high quality public transport, both to the north and the south, for Ōtaki.

Council has sought the extension of double tracking and electrification of the rail north of Waikanae. We consider that addressing the needs of Ōtaki, and advocating for double tracking and electrification, will go some way to supporting the achievement of the RLTP's headline targets, as well as delivering the sustainable growth identified in the WRGF. While the combination of double tracking and electrification is the preferred option, as this would see the existing Matangi units extended to Ōtaki when combined with an integrated ticketing system to get around comfort requirements on the longer journey, if the electric/hydrogen trains are selected then double tracking to Ōtaki will need to occur to allow for increased capacity of services to a full commuter standard.

The level of service in Ōtaki is low with only one diesel passenger service to Wellington. 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 activities that enable Manawatū Line fleet renewal and service increases.

Neither of the public transport options in the Consultation Document involve extending the overhead line network – but electric rail to Ōtaki ward where much of our population growth is forecast to occur would solve a key transport issue in Kāpiti in a way that doesn't increase Kāpiti's or GWRC's carbon footprint but will reduce vehicle emissions.

Kāpiti is a Tier 1 council in the NPS-UD and is required to make plan changes to give effect to intensification provisions. In this context, we need to make some decisions about how much intensification should occur in Ōtaki. A major criterion in our decisions is connectivity to public transport and related to that, what's planned for the railway station. We would find it difficult to encourage or make provision for development if transport improvements are not implemented in a timely manner, or considered to be planned within the context of the NPS-UD.

At present, there are no current or future provisions that would allow for Ōtaki to be classed as a Rapid Transit Stop (the definition being "frequent, quick, reliable and high-capacity"). The RLTP states that the identification of Rapid Transit Stops is '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 doesn't currently meet that definition to still be considered a Rapid Transit Stop if sufficient evidence exists it is 'planned' to be? Ōtaki needs to be a 'planned' Rapid Transit Stop 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 NPS-UD.

Council is also concerned about the bus services in Ōtaki. We need to plan for, and deliver, better services. The last improvements to peak hour runs were important for commuters, but residents who require public transportation to travel to basic community activities and services during off-peak hours are disadvantaged. Council is also keen to explore how bus services could be extended to include Te Horo. There is also a 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.

### Collaboration on Transport

Given our comments on growth and public transport provision, particularly in the north of our district, we wish to see closer partnership and engagement with GWRC when developing the public transport network links to and within Kāpiti.

We ask that GWRC work further with Council to identify opportunities for areas where joint working can support and encourage an increase in public transport use. One example is looking at the ability to future proof through purchase of land where opportunities arise to improve station access for all modes and look forward to working with GWRC on the development of Station Access plans and commenting on the Park and Ride Strategy that will be developed alongside the Regional Public Transport Plan.

Our collaborative working should extend beyond the regional boundaries. As identified in our submission on the Draft New Zealand Rail Plan, cross border complexities should not disadvantage our communities and delivery, especially where our northern Kāpiti communities sit within other overlapping public service jurisdictions. We note that the strategic objectives in the Regional Land Transport Plan include “Journeys to, from and within the Wellington Region are connected, resilient and reliable” but consider that there should be a stronger message in the Long Term Plan around the links between Kāpiti and Horowhenua and the Horizons region.

Inter-region links are likely to strengthen further in the future, and many of our residents look north for services, including healthcare, education/training, 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 partnerships 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.

Consequently, Kāpiti District seeks engagement and leadership from GWRC to front foot a number of critical issues for our district, as a key location for growth, and to ensure that growth is effectively managed and adequately supported.

#### **PUBLIC TRANSPORT**

- Council wants improved connectivity in Kāpiti, particularly to the north at Ōtaki, for better access to the north into Horowhenua and south into Kāpiti and Wellington.
- The rail network is critical to support growth and encourage mode shift and there is good reason to advocate for the extension of electrified passenger train network further north in the region, as a gateway north.
- Council would also be pleased to support GWRC in advocating for the funding to support delivery of proposals improving the Manawatū Line.
- Rolling out a new integrated ticketing solution across the public transport network should remain a priority, and Council asks GWRC to re-consider staffing levels at the Paraparaumu and Waikanae station offices.



- We seek an indication of where the additional 169 buses will be running, and ask that Kāpiti be supported by some of these new buses as well as Wellington City.
- Council is concerned about public transport options in Ōtaki, where residents have few services connecting them within the district, to the capital, and to the north.
  - Extending electric rail to Ōtaki would solve a key transport issue in Kapiti in a way that reduces our district and region's carbon footprint.
  - Ōtaki needs more buses, and we are keen to extend services to Te Horo.
  - With project population growth in the north of our district, there must be a plan to establish Ōtaki (and potentially Te Horo) as a Rapid Transit Stop.
- Overall, Council seeks more engagement and a closer partnership with GWRC in developing the public transport network in Kāpiti.

## **Climate change and coastal adaption**

### Climate change

Council is grateful for the leadership GWRC is showing in mitigating and adapting to climate change. We are very pleased to see 'Responding to the climate emergency' as one of the four strategic priorities, and being climate positive by 2035 and planning for a climate-resilient, low emissions region as key outcomes.

Council would also like to acknowledge the value of the GWRC reports on climate change and the value of the Wellington Region Climate Change Officers Group. The reports on climate change projections and impacts have been used by councils across the region for their LTP planning. It is incredibly helpful to have regionally consistent, robust projections and have this information funded either solely or jointly by GWRC. We also acknowledge that the Officers Group is assisting to align council work on climate change-related issues across the region and developing recommendations for the Wellington Regional Growth Framework on regional approaches to planning for and managing climate change impacts and a regional emissions reduction plan. Council hopes that GWRC will continue to provide this level of leadership, co-ordination and procurement of information to support the climate change agenda and that GWRC recognises the importance of the work the Officers Group is progressing.

Within the Kāpiti district, transport makes up 57% of greenhouse gas emissions, which means that mode shift from private cars to public transportation is crucial for emissions reduction and is one of the reasons why our earlier comments on improving public transport are so important.

Having 'an efficient, accessible and low carbon public transport network' as a strategic priority is important, but it is equally important that transport planning is carefully aligned with the climate change response to realise sustainable growth. To achieve this, it is crucial that key programmes (WRGF, Regional Land Transport Plan and the Climate Emergency Response Group) collaborate with each other and do not develop their work in silos.

Alongside transport measures to reduce the region's carbon footprint, Council supports phasing out grazing in regional parks (and limiting other environmental impacts) and doing so quickly. In Queen Elizabeth Park, our community is keen on a more rapid conversion and ask GWRC to consider if this could be done faster than the 10 years that is proposed in the Consultation Document.

### Coastal Adaptation

Council has strongly advocated for a regional approach to coastal adaptation for several years. A regional approach is recommended by the Ministry for the Environment in its *Coastal Hazards and Climate Change: Guidance for Local Government*, because there are many benefits to a regional approach, including regional consistency and potential cost-savings. Unfortunately, a Wellington regional approach has not gained traction beyond the report



*Preparing Coastal Communities for Climate Change*. Without this, the robustness of developing sustainable and resilient coastlines across the region will be impeded.

Council is committed to the delivery of the *Takutai Kāpiti: Our community-led coastal adaptation project* (Takutai Kāpiti project) and is in the process of establishing the Community Assessment Panel (CAP) to run over 2021/22. While Council is grateful to GWRC for confirming availability of one of their officers to attend some of the CAP meetings, the funding restraints resulting from Council delivering this project alone, are considerable.

The Ministry for the Environment promotes the Hawkes' Bay project as an ideal model for engagement with community and iwi partners, and the success of that project has been largely dependent on the role that Hawkes' Bay Regional Council has played in driving the project, including the contribution of funding. Such an approach recognises the coastal resource management responsibilities of regional councils. It is also, increasingly, the recognised approach of other similar projects nationally.

The Takutai Kāpiti project budget was allocated with the assumption of cost-contribution from GWRC in line with early discussions in 2018-19 regarding joint funding of two pilots in the region of the community-led approach. However, GWRC have subsequently confirmed they are unable to provide any budgetary contribution.

Council requests that GWRC make a financial contribution to the Takutai Kāpiti project. This financial contribution is required to support the current costs of the Community Assessment Panel process, as well as future costs that are likely to arise after the panel develops a set of recommendations for coastal adaptation as implementation is considered.

#### CLIMATE CHANGE AND COASTAL ADAPTATION

- Council hopes that GWRC continues the current level of leadership and facilitation for the climate change agenda, and recognises the importance of the work the Officers Group is progressing.
- Ensure that key programmes (WRGF, Regional Land Transport Plan and the Climate Emergency Response Group) collaborate with each other to ensure growth and transport improvements are sustainable.
- Council supports option 1 for 'Ramping up our restoration of regional parks to fight climate change', but asks GWRC to consider whether grazing in Queen Elizabeth Park could be phased out much sooner than the proposed 10 years.
- Council requests that GWRC make a financial contribution to the Takutai Kāpiti project to support the current costs of the Community Assessment Panel process, as well as future costs that are likely to arise after the panel develops a set of recommendations for coastal adaptation as implementation is considered.

#### **Flood protection and environmental monitoring**

##### **Environment and flood protection**

Flooding is a big issue in the Kāpiti and Council has ongoing issues related to flood protection and control. We have been growing steadily for quite some time, and growth projections will put further pressure on the storm water network. We have a long-term plan to maintain and upgrade the existing storm water network over the next 45 years.

With the growth pressures being placed upon us we need to prepare to accommodate the new growth, and with the emergence of the national planning framework for biodiversity and freshwater management, Council would like to know what investment in river maintenance, flood protection and state of the environment monitoring is being proposed to be



undertaken. Council would like to know more about the specific projects for, and management of, the Kāpiti environment, aside from the Ōtaki and Waikanae rivers.

- To keep flood risks to an acceptable level, we need to maintain specific parts of the critical watercourses in some urban areas. Council asks that GWRC makes provisions for balancing the growth with environmental outcomes.
- 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.

In regard to the approach of merging the environment, regional parks, and flood protection and control works activity groups together, does mean that GWRC will also be taking a holistic approach to catchment management including urban streams?

The Consultation Document does not talk with any detail about how managing the funding impacts of growth, climate change, and ageing assets on maintaining water supply infrastructure (including our open channel network), other than to say it will be hard to fully mitigate without introducing costs to either the developers, Councils or ratepayers. There is also no discussion around the funding implications of the national planning framework on 3-water's infrastructure. The funding impacts over the life of the Long Term Plan should be identified and included. The cost of these decisions will largely be borne by industry, developers and local communities via local councils.

We note the move to a catchment-wide delivery model and using integrated catchment teams. Council would like information on how this fits in with consenting requirements which are done on effects around a specific activity in a specific location? The approach for the consenting of open storm drainage channels also needs to be addressed as this is fundamental to resilience. The inability to clear these channels in a timely manner on a regular basis contributes significantly to the flood risks in our communities. This issue is frequently discussed between our organisations, and Council remains keen to work with GWRC to develop a solution to this problem. The development of the Kāpiti Whaitua committee will be helpful in addressing this issue, and Council is very supportive of starting the Kāpiti Whaitua this year, with GWRC and our mana whenua partners.

Lastly, there is a significant amount of environmental monitoring information held by GWRC received through the consents which require consent holders to gather and report back on data. Council would like to see that data compiled by GWRC and presented back to the region in a useful and meaningful way. There appears to be a duplication of data occurring within the region and Council would like to see funding in the GWRC Long Term Plan to make better use of and access to this environmental information. Council is often asked to establish the ecological baseline prior to assessing the impact of the activity on the environment.

#### ENVIRONMENTAL AND FLOOD PROTECTION

- Council would like to know more about the specific projects for, and management of, the Kāpiti environment, aside from the Ōtaki and Waikanae rivers
- Council asks that the funding implications of growth, climate change and assets be clearly identified in the Long Term Plan.
- Council would like information on how the catchment-wide delivery model fits in with consenting requirements based on effects of a specific activity in a specific location.
- Councils is keen to proceed with plans to establish the Kāpiti Whaitua in 2021, to help assist with the ongoing issues of flood protection and control in Kāpiti.
- Council asks that the environmental monitoring data provided to GWRC be compiled and presented back to the region in a useful and meaningful way.



## **Funding for pest control and Ki Uta ki Tai**

### Pest Control

Council supports the 'restoration of regional parks to fight climate change' but we emphasise the need for alignment with sustained regional pest plant and animal control at a landscape scale (not just focused on parks).

While GWRC has statutory responsibility for controlling pest plants and pest animals throughout the region, Council controls pest animals and invasive weed species as part of managing ecologically significant sites, parks and reserves. Increased funding to support greater pest animal control at a landscape scale will ensure KCDC's efforts to control pest plants on its own land are more effective. Council seeks an increase in the funding provided by GWRC for pest management activities in Kāpiti.

Council is also seeing growing public concern about problems caused by Canadian geese in Kāpiti. The birds have adverse environmental effects on private and reserve land, particularly where they gather in large numbers. This is a regional problem and a coordinated region-wide approach to this issue is needed, but currently Canada geese are not considered pest animals in GWRC's Pest Management Plan so are not a high priority for control. Council asks GWRC include Canada geese in Greater Wellington Regional Pest Management Plan and is keen to contribute to the development of a regional solution.

### Ki Uta ki Tai

We need GWRC to continue to invest in Ki Uta ki Tai to develop shared values and actions, working in partnership with iwi under a Treaty House model. This project has the potential to be a model for Whaitua planning in Kāpiti.

#### **ENVIROMENTAL AND FLOOD PROTECTION**

- Council seeks an increase in the funding provided for pest management activities in Kāpiti and asks GWRC include Canada geese in Greater Wellington Regional Pest Management Plan.
- Council requests that GWRC continue to invest in Ki Uta ki Tai.

## **The financial impacts of the proposed rating changes**

Council is concerned by the potential impact of the revenue and financing proposals in the Consultation Document. Council notes the average rates increase proposed is 12.6% for the 2021/22 year, however this is an average across the region and we calculate the average increase for Kāpiti residents to be 17%. The general rate in particular appears to be increasing significantly, by 27%. In years two and three, average rates increases of approximately 12-15% are proposed.

Council is unclear what is driving the rate increases. Of the three 'big topics' discussed, electrifying bus and rail involves significant investment but not until later years and little of that is in the Kāpiti District. Restoration of regional parks and the joint committee do not appear to involve significant investment. Council seeks to understand what is driving rates increases over the first three years, and the above average increases for Kāpiti residents.

Council is concerned that these relatively high rates increases do not take into account residents' ability to pay. These increases will exacerbate affordability issues in the district, with a high proportion of ratepayers on low and/or fixed incomes. According to Census and NZ



Income Survey data, in 2019 the median household income in Kāpiti was \$75,300, compared with \$103,800 in the Wellington Region and \$92,000 in New Zealand<sup>1</sup>.

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 current and future social, economic, environmental, and cultural well-being of community'.

#### RATES INCREASES

- Council is concerned that the proposed rates increases are too high and do not take into account residents' ability to pay these rates.
- Council seeks to understand what is driving rates increases over the first three years, and the above average increases for Kāpiti residents.

#### Conclusion

Kāpiti Coast District Council appreciates the opportunity to comment on Consultation Document for the 2021-2031 Long Term Plan for GWRC.

We consider the topics discussed in this submission are of a high priority and fundamental to sustainable and resilient growth.

We always appreciate the opportunity to discuss how we can work together to better serve our shared population and we would like to speak to our submission at the hearings.

We thank you for considering our feedback.

Yours sincerely



Wayne Maxwell  
Chief Executive

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<sup>1</sup> MBIE's Regional Economic Activity Web Tool