

11 May 2020

Ministry of Transport
PO Box 3175
WELLINGTON 6140
Attn: GPS Team

Dear Sir / Madam

Government Policy Statement on Land Transport 2021

1. Thank you for the opportunity to submit on the draft Government Policy Statement on Land Transport (GPS) 2021.
2. Kapiti Coast District Council recognises that engagement is continuing on this document that was produced pre COVID-19. However, it is understood that there is likely to be a change to the draft GPS 2021 because of COVID-19, and that COVID-19 will impact on the Transport Agency's Investment Programme, consultation on the draft Investment Prioritisation Method and Arataki.
3. Council wishes to see further consultation on any proposed changes to the GPS 2021 once the impact of COVID-19 on transport investment is fully understood.

Overview and Strategic Priorities

4. Council supports the strategic priorities for land transport investment that are contained within the GPS in principle. However, we would like to take this opportunity to raise a number of issues that are important for Kapiti Coast District Council.
5. Council recognises the need to develop a safe transport system, provide people with better transport options, and develop a low carbon transport system. We are in the process of refreshing our Sustainable Transport Strategy and our proposed key focus areas align well with these priorities.
6. We also welcome the commitment to New Zealand Rail Plan and Lets Get Wellington Moving (LGWM). However, we are concerned that the full understanding of cost allocation and relative benefits across the Region are not yet fully understood and would be concerned if those costs allocated to Kapiti outweigh the potential benefits. The scale of overall costs are also a concern if they were to limit future funding availability for other local transport improvement initiatives.

7. Council is also supportive of the need to look at alternative funding models for large intergenerational projects with the potential for loan funding or general taxation funding additional to the current fund could be considered.

Safety

8. As with national trends, the Kāpiti Coast District has seen the number of serious and fatal crashes increase over the previous 5 years and a high risk to motorcyclists and pedestrians. Therefore, we support safety being a high priority, and the vision that no-one is killed or seriously injured on our roads.
9. Council welcomes that infrastructure safety treatments on roads as a key element of the Road to Zero to be implemented through GPS 2021 and supports the development of the Accessible Streets Regulatory Package.
10. Road to Zero identifies a critical issue as being that *“87% of our speed limits are not appropriate for the conditions of our roads”* and Council recently reviewed its local speed limits on rural roads and most town centres in accordance with the Speed Management Guide. Council would welcome further regulatory support and guidance for Local Authorities relating to the creation of more consistent speed limits based on form, function, design and risk.
11. In setting appropriate speed limits, it should also be recognised that speed limit changes very often need to be complemented by physical safety improvements. Council considers that, in order to support the implementation of road safety initiatives, for speed management and the system management focus areas in Road to Zero, increased funding assistance should be considered to enable additional resourcing.

Better Travel Options

12. There appears to be little line of sight between the outcomes (such as improved access and social and economic opportunities and public transport being more available and accessible), and how these outcomes will be delivered. As an example, improving the public transport network (which includes physical measures as well as vehicles) is not identified as a way of delivering the outcomes. Similarly, GPS 2021 does not refer to measures that improve inter-modal connectivity as a way of making public transport more accessible and encouraging mode shift.
13. Council supports the optimisation and maintenance of existing transport networks and the need for transport and investment to shape and support growth. This requires a strong relationship between land use and transport planning and our draft Sustainable Transport Strategy identifies this as a focus area. We recognise that the GPS on Land Transport and the developing Housing and Urban Development GPS (HUD GPS) will help provide a strategic direction across land use and transport policy.
14. However, we urge that in developing the HUD GPS there is recognition of the importance of, and it builds upon, work already undertaken and plans in place. This includes the Regional Growth Framework, District Plans, and the Housing and Business Assessments produced as a requirement of the National Policy Statement on Urban Development Capacity.
15. GPS 2021 appears to focus on better travel options for towns and cities including the implementation of mode shift plans for Wellington, and the shaping of urban form. 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 and will require investment on rural roads and in rural areas.

16. Similarly, the GPS fails to recognise the interconnectivity between Kāpiti and Wellington. Kāpiti is the gateway to the Wellington Region and there is a regional impact of transport links and decisions. The new Expressways, for example, have made and will make travel between Kāpiti and Wellington more attractive and has contributed to the growth in Kāpiti. Reliance on the private car in towns and rural areas also contribute to the transport issues experienced in cities such as Wellington. This reliance is as a result of a lack of or substandard transport options for commuters travelling into the city. To be a project that supports the region rather than the City, LGWM should also consider and implement a package of transport measures, that extends outside the city boundary.
17. Kāpiti has seen significant growth in the last 30 years and our projections show this will continue. 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.
18. Poor transport connectivity coupled with population growth and demographic change in Kāpiti is resulting in level of service issues, such as congestion and impacts on access to goods employment and education opportunities, services, and recreational facilities as well as parking problems.
19. We support the public transport operating fund for the metropolitan rail network in Wellington through the Public Transport Services Activity Class. Kāpiti has advocated for some time for improved bus services, and double tracking and electrification of the rail north of Waikanae and on to Palmerston North, to better serve communities such as Ōtaki in the north of our District. We will provide a more detailed response regarding Kāpiti in our submission on the Draft New Zealand Rail Plan. We consider that this will play a key role in ensuring social, economic, economic and cultural wellbeing of residents north of Waikanae by encouraging mode shift, reducing transport disadvantage, and provide better access to educational and economic opportunities.
20. GPS 2021 also needs to recognise that in some rural areas like many parts of the Kāpiti Coast, there are no footpaths, cycleways or public transport available, and significant investment would be needed to achieve modal shift.
21. The GPS 2021 appears to lack much of the detail and substance that was contained in GPS 2018. As an example, GPS 2018 included measures such as providing more transport choice for people with less or limited access to public transport, and recognised that integration between modes is important in encouraging mode shift.
22. GPS2018 also identified that the second stage GPS will consider interventions to significantly improve the affordability of public transport. This appears to be omitted from the GPS 2021 and is important for Kāpiti, where the changes in household composition predicted to take place over time is likely to increase the proportion of our population that is transport disadvantaged.

23. Our ageing population also have lower incomes, and along with other low income groups, can often be isolated and unable to access social and economic opportunities. Similarly, our ageing population often have specific mobility needs that require a range of responses, from planning improving the safety of our network and ensuring that their needs are met when delivering new infrastructure, for example, new pedestrian networks accommodating mobility aids.
24. Council considers that technological advances have the ability to enable virtual access and inform transport choice, as well as reduce the need to travel. This must be supported by organisational change and the infrastructure delivery, such as fibre optic broadband, and should be recognised up front in GPS 2021 instead of hidden in the ministerial expectations of Waka Kotahi.

Improving Freight Connections

25. Council supports the priority to improve freight connections but wonders whether this needs to be a strategic priority in its own right. We would not wish to see the importance of rail freight being at the expense of passenger rail services because it has been identified as a stand-alone strategic priority.
26. With regards to resilience it appears as if this is the only strategic priority that considers the impacts of disruptive events. There is a need to ensure that the transport network can accommodate growth, changes in land use patterns, and the higher level of demands as a result of unexpected problems for everyone, not just freight.

Climate Change

27. Council supports the strategic priority on climate change. Climate change is exacerbating existing problems to the transport network as a result of increased flooding and ground water, greater storm intensity, increased landslips, sea level rise and warmer temperatures. These are pressing issues in coastal districts such as Kāpiti. Kāpiti Coast has declared a Climate Change emergency recognising and responding to the significant current and future increased impacts, including costs, associated with Climate Change, and it is considered that this should also be addressed through the GPS 2021.
28. In Kāpiti transport is also responsible over 50% of carbon dioxide emissions. Delivering schemes that ensure the reduction of emissions from transport through mode shift, public transport and better integrated transport and land use planning will be key to achieving a low carbon transport system. This is consistent with Council's strategic outcomes of delivering a sustainable transport network.
29. The Climate Change Zero Carbon act requires the government to develop and implement policies for climate change adaptation, this should be recognised in the GPS 2021. Council would be keen to understand the funding relationship between the National Adaptation Plan and the National Land Transport Programme. This applies not only to the development of new infrastructure but also its continued maintenance and operation. Council is currently in the process of developing our Climate Change Strategy and consider that it will be necessary to engage and consult with local authorities on the National Adaptation Plan.
30. GPS 2021 also appears to not fully consider the significant harm that transport systems can impose on the environment. There is a range of effects on water, wildlife and soils, as well as on communities that have been split by roading infrastructure or that have been

bypassed through the construction of new roads, that also need to be recognised and addressed.

31. Council also contends that, in addition to recognising that mode shift also needs to be supported outside of the major cities, that the GPS should also address the fact that changing to more environmentally friendly fuel types across New Zealand also requires supporting infrastructure. Charging points can very often require changes to the local and state highway roading network that needs to be provided for in this activity class.
32. There is also a role for technology in both improving access to transport services and reducing the need to travel. COVID-19 has changed our working patterns and has led to benefits such as decreasing fatalities and accidents on our roads, emissions, noise and pollution levels, and congestion, as well as improvements in air quality. Whilst travel levels are likely to approach pre COVID-19 levels as we recover, the benefits of technology in supporting climate change policies should also be recognised.
33. COVID-19 may also lead to the decentralising of services, which will also need to be supported by appropriate infrastructure.

Indicators for How Progress Will Be Measured

34. Council supports indicators as a way of measuring results but have the following comments:
 - Who will be expected to measure these indicators?
 - Indicator 3: What is a reasonable travel time?
 - Indicator 4: How is frequent public transport service determined?
 - Indicator 6: Does predictable journey time mean predictably good or predictably bad and how do you measure success?

Funding

35. Whilst Council supports the need for transport investment, it is concerned with the ability to meet the expected local share. Kāpiti Coast District has a growing elderly population on fixed incomes, and affordability is an ongoing and major issue when developing infrastructure programmes and budgets. 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.
36. Council supports the increase in funding availability for local road maintenance as we consider this is required to ensure a high standard and safe network, however there appears to be little mention of this in the main body of GPS 2021.
37. Council, is disappointed that the funding for local road improvements has decreased significantly compared to GPS 2018. In 2022/23 this is proposed to decrease by over 50% and is comparatively disproportionate to the proposed reduction in spending on state highway improvements. Council considers that if there is an issue with previous years' uptake of funding within this category then that is more likely a further indication of the financial pressures Local Authorities are under with regard to the ability to fund their share of any project.

38. Council requests further consideration of how the relationship between different funding options in the proposed funding toolkit can support local authorities in the delivery of local and regional schemes. Councils investment decisions are made within the context of funding constraints and our financial strategy has a focus on reducing the council's debt.
39. There is significant pressure on council to keep rates and debt down, yet there is increasing need to invest in roading to support growth and outcomes sought in the GPS. For council to support the principles in the Government GPS the GPS also needs to recognise the need for support for council investment in these assets. It may be that further consideration needs to be given to a greater government contribution through a changed funding assistance rate for projects that help deliver on the GPS 2021 objectives.
40. The government should work with local government to review local government funding tools / financing options 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).
41. We seek clarity on whether the Waka Kotahi board's ability to approve a local share for projects such as State Highway improvements. Is this to enable local authorities to drive projects they would like to see on State Highways, or will it allow Waka Kotahi to require local authorities to pay a local share on a State Highway schemes. The latter would not be supported by Council.

General comments

42. GS 2021 identifies that it provides stronger guidance on what Government is seeking from land transport investments but lacks some of the detail in GPS 2018.
43. 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. 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.
44. 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.
45. Council also considers that the social and economic impacts of transport projects should also be recognised. Mackays to Peka Peka and Peka Peka to Ōtaki Expressways, for example, have contributed significantly to an increase in retail and tourism spending in Kāpiti (around 15% in Paraparaumu Beach). Transport plays a key role in contributing to the wellbeing of our communities, it influences the ability to move around and has an immense impact on people lives.
46. We consider that there is a need for a stronger focus on resilience as 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.

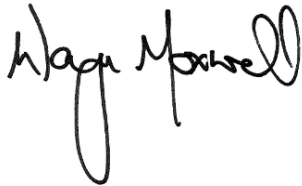
47. We urge that the resilience work undertaken by Waka Kotahi is built upon, and look forward to the National Adaptation Plan.

Conclusion

48. Kāpiti Coast District Council supports the strategic priorities in the GPS 2021 but wish to raise a number comments on investment priorities including that Council:

- supports the need to better align transport and land use planning;
- is advocating for investment in public transport and electrification / double tracking to support communities in the north of the district;
- contends that there is a need to consider connections between modes and mode share plans outside of cities;
- considers that the funding toolkit should be developed with local authorities to ensure sustainability;
- wants to see transport affordability as promised in GPS2018 as this has not been fully addressed;
- supports climate change priority but is keen to understand the relationship between National Adaptation Plan being developed and the National Land Transport Programme and considers need stronger resilience focus;welcomes investment is concerned around possible constraints in local share funding;
- is concerned over reduction in local road improvements funding (up to 50% compared to GPS2018 in some years); and
- welcomes investment in Wellington Region e.g. metropolitan rail line and Let's Get Wellington Moving, but is concerned that the full understanding of cost allocation and relative benefits across the Region are not yet fully understood;

Yours sincerely

A handwritten signature in black ink, appearing to read 'Wayne Maxwell'. The signature is fluid and cursive, with a large loop at the end of the last name.

Wayne Maxwell
CHIEF EXECUTIVE
Te Tumuaki Rangatira