

28 March 2024

Ministry of Transport  
Wellington  
C/- GPS@transport.govt.nz

Tēnā koe

**SUBMISSION OF KĀPITI COAST DISTRICT COUNCIL TO DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2024-34**

1. Thank you for the opportunity to comment on the draft Government Policy Statement on Land Transport 2024-34 (GPS).
2. As the gateway between Horowhenua and the Wellington Region, the Kāpiti District is well-positioned to leverage the significant investments that have been made to the regional and inter-regional transport network.
3. Improved North-South linkages through enhanced rail services north to Waikanae and the opening of the expressway from Mackays Crossing to Ōtaki and the Transmission Gully motorway, have strengthened the district's linkages to Wellington, increasing the district's attractiveness to people seeking lifestyle changes and housing choice. These significant transport investments have enabled increased opportunities and efficiencies for households and businesses, driving strong investor interest in housing and industry across the Kāpiti District.
4. Our land transport network supports our people to access the things they need. Ensuring the right infrastructure is in place, including improving transport connectivity across the district and inter-regionally, will be critical to supporting jobs and growth in Kapiti, whilst preserving the quality of life and amenity for which the district is known. This will require transport planning and funding arrangements to balance a strategic view of transport needs across the country, while enabling local fit-for-purpose solutions that will deliver efficient, effective and sustainable investments at the right time.
5. Core issues for our district continue to be:
  - Enabling efficient and sustainable transport for people across our district both North and South, especially for Ōtaki – we need to ensure we are getting the basics right and that people have the ability to get to the services they need to thrive.

- Considering the strategic value and costs of land transport investment holistically (eg the value of low carbon and active transport as well as the value of transport that is accessible for all).
  - Sustainable and clear funding mechanisms that account for short, medium and long-term needs.
  - Managing the project planning and delivery challenges associated with persistently high rates of construction-sector inflation.
6. We can see progress in some of these spaces through the outlined major projects, strategic priorities and outcomes sought. However, we would like to see more to support the needs outlined above.
  7. In particular, we are concerned about the reduction in public transport fare subsidies having an impact on our community's ability to afford the public transport they need to get to core services that are delivered for our people outside of our district (eg hospital, policing and corrections activity for Ōtaki) and the large proportion of our residents who commute outside the district for work (27%). We note that the Ōtaki to North of Levin project is positive in this respect, for those that have reliable access to cars.
  8. Considering this, Council supports the comments made by Taituarā in its submission, particularly in relation to the need extend the planning horizon of the GPS from 10 to 30 years, to enable longer-term strategic investment certainty and direction.
  9. We would further emphasise the importance of ensuring there is alignment in not only strategies and investment planning but the supporting funding priorities and processes which together will help achieve better national, regional and local alignment and delivery of shared transport and economic and social outcomes. A funding cycle that delivers 6 – 10 years of funding certainty (as opposed to the current 3-year cycle), would make a great difference to the ability to providing certainty and delivering on key projects that contribute to the long-term infrastructure needs of our community. We note this may require an approach that crosses sectors and is pragmatic over political cycles to enable consistent long-term priorities.
  10. Council is also in agreement that future GPS should allow greater lead-in time, to enable meaningful consultation with stakeholders with the aim of achieving better alignment between national and local/regional transport plans (LTPs and Regional Land Transport Plans).
  11. Council also supports the submission by LGNZ, including the call for a national freight strategy to guide diversified investment in road and rail, with the aim of improving the resilience of the freight network and balancing the consequences and efficiencies of road freight with road safety and maintenance considerations.
  12. In addition to the above, we have specific feedback on the System Reform, Strategic Priorities and Outcomes, and Investment sections. This is set out below by section.

## **Feedback on Strategic Priorities**

### *Active Transport*

#### ***Council would like to see inclusion of mitigation of environmental impacts and support for active transport as a strategic priority***

13. In 2022, Council adopted a Sustainable Transport Strategy (Strategy), which provides a framework for guiding local transport investment decisions in Kāpiti, towards 2035, and forms the basis for Council's engagement with regional and central Government regarding the district's transport priorities. The Strategy's principles for the Kāpiti District's 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.

14. Council's Strategy highlights that integrating land use planning and transport investment decisions, supported by balanced investment in public and active transport infrastructure, will be critical for achieving the Kāpiti community's objectives for environmental and community wellbeing. Otherwise, we risk exacerbating car dependency, economic inequality, the consumption of productive land for housing and transport-related climate impacts.
15. In light of this, Council submits that including the mitigation of transport-related environmental impacts including climate change, as an additional strategic priority in the draft GPS 2024, would give greater effect to the Government's commitment to establishing a secure long-term investment program for transport infrastructure, fit for the 21st Century.
16. Active transport funding is important element of encouraging mode-switching and supporting other transport objectives including reducing congestion and road maintenance costs, helping to achieve our carbon emission reduction targets, and improving health and wellbeing outcomes for our communities. Such transport options are also core to tourism opportunities that support economic development opportunities in our district. Council is concerned, therefore, that the draft GPS provides for allocated funding for the maintenance, but not new construction, of active transport infrastructure (such as walkways and cycleways). Council notes that under the draft GPS, the funding allocated to active transport infrastructure is to be effectively halved.
17. Strategic investments have been made to the Kāpiti District CWB (cycleway, walkway and bridleway track) network over the past decade, driven by local community demand for these improvements, and supported by local, regional and central Government funding. Gaps remain, however, in some parts of the CWB network. Closing these gaps would improve public safety and the function and efficiency of the road network more broadly. In light of this, Council would like to see funding for new walking and cycling network infrastructure available, beyond maintenance, in the GPS.

#### *Road safety*

#### ***Council is committed to road safety and supports a more localised, pragmatic approach to setting speed limits, where the needs of local communities are supported by central Government funding***

18. Council is committed to infrastructure and good road design that supports safety for all road users. Local road speed zones should reflect the design speed of the road, having regard to the safety of all road users, including pedestrians and cyclists. A road's design speed is typically a product of the history of the road design, as well as its land use context and community composition. Council is concerned that the proposed reduction of funding for traffic calming measures may be counterproductive to achieving the right balance between road efficiency and public safety, suitable for a particular location and community need.
19. Reflecting this, Council agrees that a shift to a more localised, pragmatic approach to setting speed limits is valuable having regard to the needs of local communities, supported by central Government funding.
20. This is supported by Kāpiti Coast Speed Management Plan 2023-33, where the Implementation Plan focuses on reducing speed limits around schools and town centres where there are high numbers of pedestrians and cyclists.
21. Council supports the approach to implementing interventions that provide value for money. For example, an area-wide approach followed by corridors followed by site

specific interventions. This approach could have the potential to deliver higher benefits than the current approach to road safety.

22. Council also looks forward to the new set of objectives and intended actions for road safety that will focus on safer roads, safer drivers and safer vehicles. Council submits, however, that ensuring safer speeds is a key tool in making our roads safer especially in the urban environments around schools and town centres where there are high numbers of vulnerable road users.

## **Feedback on Investment in Land Transport**

### *Fund allocation*

***Council is pleased to see some priority funding that reflects our district's needs, but would like to see emphasis on getting the basics of public transport right, and focus on interregional priorities***

23. Council supports the increases in funding both through the National Land Transport Fund and direct Crown appropriation in the draft GPS. Notwithstanding, Council would like to ensure that the allocation of funding under the GPS adequately reflects, and responds to, the transport challenges facing Kāpiti.
24. Currently, the northern part of Kāpiti is under-served by public transport, as Wellington's regional rail services stop at Waikanae, and those for the Manawatu region (Horizons Regional Council) stop at Levin.
25. Interregional transport is a priority in our district given the close links between us and the Horowhenua, particularly in relation to the transport needs for Ōtaki. This would strengthen the ability of Ōtaki residents to get to the services they need. We frequently hear concern regarding the ability of people in Ōtaki who do not have use of a car and cannot access many of the basic social services, many of which are based northwards in Levin, in a different region and transport network area.
26. Council is pleased to note the Government's commitment to funding the Ōtaki to North of Levin improvements to SH1. This will improve connectivity between northern parts of the Kāpiti Coast District with Horowhenua and Levin, supporting connections for health, education, and jobs.
27. Council is pleased to see the inclusion of public transport investments, including rail improvements in the lower North Island, as a funding priority. Kāpiti Coast District Council would like confirmation that this allocation will facilitate the extension of electrified commuter rail service to Levin (including Ōtaki); and if not, how additional services will be funded to ensure people can get around and access critical services for which they otherwise will not reach. These investments will assist in addressing the service gap in transport infrastructure currently experienced in the northern part of Kāpiti and for enabling balanced and sustainable regional growth along this important transport corridor, including into the Horowhenua district, which is also expecting significant growth in the future.
28. Given the absence of an interregional activity class in the GPS, we would appreciate the Government's clarification on the implications of the GPS funding model on this important inter-regional public transport service. Further, Council would appreciate clarity on the range of transport investment opportunities within each of the GPS funding categories.
29. Council also welcomes the GPS allocation of funding for Electric Vehicle Charging Infrastructure, which will aid the transition to increased electrification of the private vehicle fleet.

30. The emphasis on preventative maintenance is welcomed, highlighting the necessity of integrating resilience in the initial design stages and considering replacement as a critical phase. However, the proposed arrangements for pothole funding should acknowledge the higher level of complexity, costs and timing constraints associated with road reconstruction. The arrangements should also seek to achieve a workable balance between 'fixing potholes' in a timely manner vs achieving a cost effective and efficient delivery of road improvements, within the resource constraints of road authorities.

*Equity and efficiency - Toll roads and PPPs*

***Council notes the consideration of alternative funding models but this needs to be balanced with consideration of equity in the burden of changes across communities***

31. The GPS notes that "Increased public transport fare-box recovery and third-party revenue will be expected from local government". Council acknowledges that the identification of alternative funding sources for transport investment, such as value capture and congestion pricing, is necessary to secure sustainable transport funding over the long term. Council notes the Government's commitment to considering the use of road user tolls and Public-Private-Partnerships (PPPs) in the delivery of all new roads.
32. Council acknowledges that congestion pricing and user charges may provide sustainable sources of funding, whilst encouraging transport mode shifting to mitigate the social and environmental consequences of private motor vehicle use.
33. Council supports the investigation of alternative funding and delivery models which might help unlock significant local development opportunities, particularly those that are currently subject to infrastructure constraints. It will be important to ensure, however, that such alternative models are developed in close consultation with local government and industry so that they adequately reflect local needs and local conditions.
34. It is hoped, however, that the Government will consider the consequences of introducing new transport-related charges carefully, particularly with respect to equity and efficiency considerations. Such financial incentives need to be paired with strategic investment in public and active transport modes, ensuring that the setting of user charges addresses social equity considerations. A recent review of road tolling in New South Wales indicates that this is a challenge with general road tolling system (refer to [Toll Review | NSW Treasury](#)). The independent review recommended improving the transparency and regulatory oversight of PPP agreements and the arrangements for toll pricing.
35. The burden of transport user charges (public transport fares and tolls) tends to fall disproportionately on lower-income households, particularly those living in areas more remote from employment centres. In addition, increasing public transport fares has the potential to discourage patronage, undermining the broader benefits associated with public transport usage for the wider transport network (including addressing traffic congestion, air quality and climate change). Therefore, Kāpiti Coast District Council think it would be useful to consider this, and the lessons from the NSW experience, when considering the expanded use of toll roads across the motu.
36. This also highlights the need for the GPS to take a holistic approach, reflecting the full suite of community values (economic, social, cultural and environmental), when setting the decision-making framework for transport funding and delivery.

## *Value for Money and Resourcing*

### ***Council supports efficiencies in temporary traffic management and business case processes, in the context of ensuring longer term priority setting and funding certainty, and an intergenerational balance of funding through debt.***

37. Council supports reducing expenditure on temporary traffic management, which would reduce the cost for rate payers when maintaining our roading network and implementing new projects. It is noted, however, that this would require changes to the rules set for the sector by Waka Kotahi NZTA.
38. Council also supports the proposal to build a more efficient business case process, as it is hoped this will result in expedited/simplified decision making from Waka Kotahi NZTA, thereby enabling delivery to be maximised. At present, taking into account decision processes, many Road Controlling Authorities are effectively trying to deliver a 3-year work programmes in two and a half years. As noted at paragraph 9, this should also be balanced with a commitment to longer term funding certainty.
39. We note that the proposed programme of debt repayment is ambitious and would recommend that a more moderate programme is considered, balancing the funding of projects that will have long term benefit across generations, in line with Treasury recommendation on the use of debt to fund infrastructure. This would also align with the 30-year approach to investment planning requirements.
40. Council acknowledges that the GPS 2024 strategic priorities represent a significant shift from the GPS 2021 investment signals. Whilst inevitable with a change in Government, this presents a challenge when forming an effective forward works program and activity management plans. It also creates inefficiencies on already limited resources, as our construction and maintenance suppliers continue to struggle to find enough skilled staff to deliver projects in the Kāpiti district and surrounding region.
41. Further, while supportive of the Road of National Significance (RoNs), Council is concerned that we have not seen a residual increase in resources within the Kāpiti area as an outcome of the RoNs projects constructed through the district. The drain on personnel and technical expertise impacts Council and our ability to hire and retain staff however much of the RoNs workforce did not stay in our local industry after these projects were completed.
42. Considering this, Council would like to see a more bipartisan approach to long-term transport funding. Council also hopes Government will work to ensure better alignment between the strategic funding priorities of the GPS, and the physical and human resources required to deliver funded transport projects on time and within budget.

### **Feedback on System reform**

#### *Fast track consenting*

### ***Council recognises the role fast track consenting can play to support both immediate priorities and long-term 'good' growth planning***

43. We will only briefly comment on fast track consenting here, as Kāpiti Coast District Council is also submitting on the Government's Fast Track Consenting Bill, but note that it is also mentioned in the GPS in relation to transport consenting. Further information on our position with respect to fast-track consenting will be in our main submission on this.
44. We acknowledge that fast-track consenting is a useful tool, but would note the use of this tool must be balanced with the need to plan projects in the context of the wider picture of growth and future needs to ensure we are planning our infrastructure holistically to provide 'good growth' and maximising economic opportunities. In extending the fast-track consenting arrangements, the Government will need to ensure that project design and

delivery processes, associated with these significant infrastructure projects, maximises their short- and long-term potential while adequately mitigating environmental and social impacts. This will be important for ensuring transport projects of national significance do not result in disproportionate adverse impacts for local communities and the natural environment.

45. Thank you again for this opportunity to comment on the draft 2024-34 draft Government Policy on Land Transport and we would welcome any opportunity to discuss this submission in person.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Darren Edwards', written in a cursive style.

Darren Edwards  
**CHIEF EXECUTIVE | TE TUMUAKI RANGATIRA  
KĀPITI COAST DISTRICT COUNCIL**