

Out of scope

Programme Manager, Transport Services
Waka Kotahi NZ Transport Agency
Majestic Centre (Level 5)
100 Willis St
Wellington 6140

By email: WNOR@nzta.govt.nz and **Out of scope** [@nzta.govt.nz](mailto:Out of scope@nzta.govt.nz)

Tēnā koutou Waka Kotahi NZ Transport Agency, **Out of scope**

RE: Submission on Response to the Consultation on NZTA3.B – Future of SH59 post opening of Te Aranui o Te Rangihaeata

The Greater Wellington Regional Council (**the Council**) thanks Waka Kotahi NZ Transport Agency (**Waka Kotahi**) for the opportunity to provide feedback on the Consultation on NZTA3.B – Future of SH59 post opening of Te Aranui o Te Rangihaeata.

The Council has considered how this proposal aligns with the strategic objectives of the Greater Wellington Regional Land Transport Plan.

This Council wishes to **emphasise** the following points:

1. The proposal must align with the Regional Land Transport Plan's strategic targets
2. The proposal needs to consider how this section of road contributes to the Emissions Reduction Plan and specifically how it can support reduction in VKT
3. Development of a Strategic Plan should not be delayed
4. Recognition of Ngāti Toa as Mana Whenua

1. The proposal must align with the Regional Land Transport Plan's strategic targets

The Council expects all decisions made about the future of these roads by Waka Kotahi to take into account the RLTP 2021 targets of:

- a. *40% fewer deaths and serious injuries on our roads*

In the Wellington Region, 66% of all deaths and serious injuries occurred on urban roads, with pedestrians and cyclists over-represented in these statistics. Waka Kotahi NZ Transport Agency needs to consider the safety of all road users, not just motor vehicle users, in the proposal.

The Council has been unable to consider the implications of the proposal on road user safety in part because a Safe System / Road Safety Audit assessment of this proposal has not been made available as part of the consultation.

b. 35% less carbon emissions from transport and 40% increase in the share of trips by active travel and public transport.

The proposal has a significant focus on motorised traffic, which risks missing the opportunity to significantly improve service levels for active transport users, including those using active transport as first/last leg links to public transport. The RLTP targets of reducing carbon emissions and increasing active travel and public transport trips are ambitious targets and therefore require commitment from all our partners to achieve them.

While the proposal makes note of the lower vehicle volumes following the opening of Transmission Gully, there is a visible upwards trend in vehicles using the road. The proposal and its current 'do nothing' status will continue to prioritise motor vehicle transport, which will negatively impact the region's ability to achieve its carbon emissions reduction and active travel targets – particularly as land development results in increasing population and demands on the network.

2. The proposal needs to consider how this section of road contributes to the Emissions Reduction Plan and specifically how it supports reduction in VKT

The motor vehicle centric nature of this proposal means it is missing an opportunity to achieve a significant shift in mode choice, as required by the VKT reduction targets set out in the national Emissions Reduction Plan. In introducing the concept of reducing light vehicle fleet Kotahi stated that '*all councils should contribute to an overall reduction in transport emissions by 41% by 2035 (as compared to 2019) and a reduction in VKT by cars and light vehicles by 20% by 2035.*'¹ The Council would like Waka Kotahi NZ Transport Agency to reconsider the proposal against its own advice for reducing VKT. Trialling an alternative corridor allocation model would allow Waka Kotahi to be contributing to, and supporting, the regional VKT reduction target (draft regional VKT reduction target for the Wellington Region is for a 29% reduction by 2035 compared with baseline).

¹ <https://www.nzta.govt.nz/planning-and-investment/national-land-transport-programme/viewupdate/290#:~:text=With%20the%20release%20of%20the,vehicles%20by%2020%25%20by%202035>. Accessed 27 02 2023

3. Development of a Strategic Plan should not be delayed

The proposal document is unclear about when the Strategic Plan will be finalised. The Council strongly supports Waka Kotahi developing the proposed Strategic Plan (for the full SH59 corridor), in partnership with Porirua City Council at the earliest convenience. There is currently a unique opportunity for achieving mode shift changes now, but these could be lost if too much time is spent on an administrative project to develop a plan before physical changes can be made. This Strategic Plan should also consider the impact the Northern Growth Area Specified Development Project will have on the network.

4. Recognition of Ngāti Toa as Mana Whenua.

The Council notices the lack of recognition of Ngāti Toa as Mana Whenua in the consultation document. The Council urges Waka Kotahi NZ Transport Agency to partner with Ngāti Toa in the changes made on this road.

5. Further Contact

We welcome the opportunity for Greater Wellington Regional Council officers to engage further with Waka Kotahi – New Zealand Transport Agency on any aspect of our submission. For future discussion, please contact:

Out of scope, Senior Strategic Advisor, Regional Transport
Out of scope [@gw.govt.nz](mailto:Out of scope@gw.govt.nz)

Out of scope, Manager, Regional Transport
Out of scope [@gw.govt.nz](mailto:Out of scope@gw.govt.nz)

Ngā mihi nui

Out of scope

Out of scope

General Manager, Strategy
Greater Wellington Regional Council