

7 October 2024

NZ Transport Agency Waka Kotahi
Private Bag 6995
Marion Square
Wellington 6141

RE: Ōtaki to North of Levin tolling

Tēnā koe,

Thanks for the opportunity to provide feedback on the proposed tolling of part of the new Ōtaki to North of Levin (Ō2NL) highway.

Kāpiti district sits at the northern boundary of the Wellington region. The southern parts of the district utilise health, educational, and social services, and employment and business opportunities from the wider Wellington region to the south. However, the northern end of the district including the township of Ōtaki look north to Levin in the Horowhenua District for these services. For health services, residents look even further afield to Palmerston North. For the residents of Ōtaki and its surrounding areas, the Ō2NL is a long-awaited improvement to their lives, making services and opportunities more accessible and convenient to commute to, in support of their wellbeing.

Overall, Kāpiti Coast District Council is:

- **Supportive** of the new Ō2NL highway and the improved access and benefits it will bring to the Kāpiti Coast District and the wider Horowhenua - Wellington region.
- **Not supportive** of the proposal to toll part of the new Ō2NL highway.

We are concerned that the tolling proposal will cause undue hardship to residents in Ōtaki and surrounding areas and will undermine the purpose for building the new highway. Our concerns relating to the issues and impacts from the tolling proposal include:

1. Safety and resilience:

The residents of Ōtaki and surrounding areas should be able to travel safely on a resilient highway available to them in all circumstances. We consider introducing a toll on Ō2NL to be inappropriate, for the following safety reasons:

- It is inappropriate to toll a road which is being built for safety purposes. Of note, the current highway and future 'alternative' road is considered one of the most dangerous roads in the country, due to geometrics, and a number of narrow bridges of poor and

outdated design. Median barriers and a reduced speed limit have been introduced as mitigations to improve safety. These have not improved, but exacerbated problems due to the roads use by rural traffic (tractors etc).

- High levels of ongoing usage of the local road also won't decrease risks from traffic turning into roads and driveways, school children walking home from bus stops, pedestrians and ongoing impacts on Ngāti Raukawa iwi, hapū and marae between Ōtaki and Levin.
- We question whether the existing state highway is a "feasible untolled route" because the road is not considered safe now, hence Ō2NL being built as a replacement road.
- We have ongoing concerns in relation to the Taylors Road local road arrangement as identified in the O2NL Notice of Requirement application. It is our view that this road is not suitable from a resilience and roading efficiency point of view. The current Taylors Road arrangement is susceptible to flooding in a small rain event, compromising the resilience and use of the local alternative road. The road also has a poor geometric design with 5, 90-degree bends which are not suitable for heavy vehicles. Tolling and additional local use will exacerbate this risk.

2. Connectivity and equity:

Several communities living along Ō2NL already experience deprivation and tolling will exacerbate this issue. We consider that the residents of Ōtaki and surrounding areas should have the same levels of free and safe access to their necessary services (health, education, employment) as provided to all other New Zealanders.

We have concerns that introducing a toll on Ō2NL will result in the following connectivity and inequity issues:

- Introducing toll fees will create a financial barrier for residents to commute between towns, from Ōtaki to Levin, to maintain familial and friendship relationships, economic activity, and for most social services. Tolling will disproportionately affect people travelling to/from Ōtaki, Manakau, and Ohau as the proposal leaves Levin untolled.
- It will also restrict access to Palmerston North for residents where affordability is already an issue. As part of a rural health district, Palmerston North is the closest hospital for Ōtaki and surrounding areas. Tolling Ō2NL will increase already high costs of living and limit access to affordable and reliable healthcare, exacerbating existing inequities.
- Tolling is a direct and regressive tax on locals in the region who must either pay a toll or use a less efficient and more dangerous road as an alternative to access daily life opportunities and services. Tolling will lock in, through cost, many more years of using a busy and dangerous roading link to access these services.
- The historical social/family/whānau, economic, educational and cultural links between Ōtaki and Levin are significant. With no frequent or reliable public transport between these two towns, travel by private transport is by necessity rather than choice. The proposed tolling of the Ō2NL will further embed an ongoing inequity that the people of Ōtaki and surrounding areas currently experience.

3. Economic and public benefit:

With tolling and the resulting moving of more traffic to the old highway, the economics and public benefit of the new highway needs to be reassessed. Identified issues with the proposal include:

- Traffic volumes on the new highway may reduce if more locals continue to use the old highway. This alters the cost/benefit calculations supporting the new highway's build.
- To fully understand the impact of the proposal, a willingness to pay and full social impact assessment is required. It is not clear that these assessments have been completed.
- Ongoing upkeep of the old highway will fall on the ratepayer, which has a significantly smaller revenue base than those available to the NLTP. The resilience of the local alternative road and levels of maintenance needed to ensure the road continues to be kept safe (particularly if people continue to use the road to avoid tolls). These costs are likely to exceed those forecasted in the business case for reverting the old road to a "local road". This could also have an impact on the use and arrangements for local roads agreed as part of the completed expressway relating to Ōtaki.
- Placing a toll on heavy and commercial vehicles will result in these costs being passed onto the consumer, including on essentials such as food. Under the existing economic climate and ongoing rising costs of goods and services, any economic benefit of tolling Ō2NL will be eroded by this cost shift for the communities affected.
- Tolling the new highway creates a barrier to general use by locals. This erodes the public benefits of building the new highway.
- If the purpose of the toll is for maintenance and operations of Ō2NL, rates of \$2.70 and \$5.40 are inappropriately high. For example, existing toll roads in Auckland and Tauranga are tolled at similar rates but those tolls are used to repay the costs of construction. Although maintenance and operations funding may be significant, one would also expect the toll rates to fluctuate or be reduced in alignment with its asset management plan.

4. Impact on purpose:

Consultation material supporting the proposed tolling claims that the Ō2NL is being built to support growth and efficiency in the region. We believe that tolling undermines this purpose because:

- Tolling neither supports the growth of the area, which is growing rapidly, or the efficiency of business in the local area – it is just another cost.
- Effectively, local residents and businesses will be subsidising efficiency gains of long-haul road freight and long-distance travellers.
- Expected reduction in travel times will be minimal for locals, who for affordability reasons, may be 'forced' to use the old highway alternative.
- Tolling is a highly regressive tax that can significantly impact poorer communities. Government already has an equitable funding system for roads, based on choice to use – the existing fuel tax/road user charges system. Increasing rather than suppressing costs through this efficient and equitable mechanism would ensure the true costs of our roads, of safety improvements, and increased efficiency and convenience, is met by all.

We have had feedback from our northern iwi partner, Ngā Hapū o Ōtaki, who are opposed to the tolling of Ō2NL given the particular negative impacts and outcomes it would have on whānau and hapū members living in the area. They have indicated support of this submission.

Thank you for the opportunity to submit on this tolling proposal. We would be happy to discuss the points outlined in this paper with officials and the Minister.

Yours sincerely



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Kāpiti Coast District Council



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