

HURUNUI DISTRICT COUNCIL

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30th May 2024

NZ Transport Agency Waka Kotahi
PO Box 6995
Wellington 6141

By email: emergencyworksreview@nzta.govt.nz

Hurunui District Council submission for NZTA Emergency Works Investment Policies Consultation

This letter and the attached response to your questions make up our submission.

The Hurunui District Council appreciates the opportunity to submit feedback on the proposed changes to the emergency works investment policies. This submission reflects our commitment to maintaining and improving the resilience and functionality of our local transport infrastructure, which is crucial for our community's wellbeing and economic activity.

Context

We are of the opinion that the way roading is funded in is flawed, as the funding is focussed on operational and maintenance issues. As such it does not consider intergenerational equity in funding of assets and does not encourage depreciation of those assets to fund future replacement. It is our view that it is appropriate to debt fund long life asset investments such as bridges, and to fund depreciation of those assets to ensure future generations pay their share and are not saddled with the entire end of life replacement costs.

Our context

Hurunui District is a vast area with a population of approximately 12,500. Our roading network spans 1,500 km, including 280 bridges, and we share boundaries with eight other territorial authorities. Significant portions of State Highways 1 and 7/7a run through our district, making our local roads a vital part of the regional and national transport network. Given the predominance of low-volume, high-value roads, maintaining and enhancing these vital links are essential for our community.

Hurunui District Council feedback on the NZTA Emergency Works Investment Policies Consultation

- 1. Impact of Proposed FAR Changes and Qualifying Events:** The proposed changes to the FAR, particularly increasing the qualifying event threshold to a 1 in 20-year event and reducing the enhanced FAR to normal FAR +10%, will significantly impact our ability to provide the local share required. The increased financial burden may lead to delays in response and recovery efforts, especially for events that fall below the new threshold but still cause substantial damage. With the frequency and severity of 1 in 10-year events increasing it seems at odds with all the information being disseminated about preparation for climate change. The reduction in NLTF support will further strain our financial resources, and our capacity to restore essential infrastructure and services.

While we understand the financial pressures currently being experienced throughout the transport sector, there are limited funding levers available to local government. Securing local funding share to meet the government's expectations will become increasingly difficult, particularly for smaller rural Council's with a network covering a vast expansive area. It is worth noting that this adds to the already experienced burden of the loss of the SPR.

- 2. Effects on Planning and Investment in Maintenance and Resilience:** The requirement for activity management plans to consider network prioritisation and levels of service in advance of an emergency event will create additional pressure. Developing these plans will require significant time and effort beyond the proposed implementation date.
- 3. Transitional Issues:** We recommend a longer timeframe to implement the proposed changes to ensure we are given adequate time to re-plan and re-allocate budgets without forgoing maintenance renewals and resilience investments. A transitional period better aligned with the 2027 RLTP and National Land Transport Programme planning process would allow us to continue to work towards a proactive approach in line with our activity management plan. Further clarification is needed on the treatment of activities currently funded via emergency works.
- 4. Additional Policy, Planning, or Process Changes Needed:** Consideration should be given to creating a fund specifically for resilience improvements, which could be accessed more readily than the enhanced FAR, especially for smaller scale but frequent events.

Yours sincerely,

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Signed by Hamish Dobbie
Chief Executive Officer and authorised signatory
Hurunui District Council

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