

**Before a Panel of Independent Hearing Commissioners
appointed by Wellington City Council**

IN THE MATTER OF the Resource Management Act 1991 (**RMA**)

IN THE MATTER OF the hearing of submissions on the Proposed Wellington City Plan

**STATEMENT OF EVIDENCE OF AKHYLESH BABU KESHABOINA FOR WAKA KOTAHI NZ
TRANSPORT AGENCY**

Dated: 8 February 2023

1. EXECUTIVE SUMMARY

- 1.1 My full name is Akhylesh Babu Keshaboina. I am the Regional Manager, Systems Design, for the Wellington region and Top of the South Island at Waka Kotahi NZ Transport Agency (**Waka Kotahi**) and am presenting evidence on behalf of the organisation.
- 1.2 My evidence outlines the statutory functions and obligations of Waka Kotahi and some of the aspects of the wider transport planning system, such as the Government Policy Statement.
- 1.3 Waka Kotahi is responsible for contributing to an effective, efficient and safe land transport system in the public interest. This includes managing the state highway network, shared paths and funding councils to manage the local road network. The location and nature of development strongly influences the demand for travel and subsequent infrastructure and operational investment by Waka Kotahi.
- 1.4 The key outcomes sought by Waka Kotahi in relation to the Proposed District Plan are to:
 - (a) Promote integration of development with public and active transport and its funding; and
 - (b) Reduce the distances that people travel for their everyday trips and enhance the options available to them to travel by means other than the private car.
- 1.5 Overall, Waka Kotahi supports the officer's recommendations for Stream 1 of the Proposed District Plan. However, as outlined below, and as outlined in the evidence of Mr Alastair Cribbens, there are residual concerns outstanding in relation to the location of intensification, particularly as it relates to the extent of walkable catchments around rapid transit stations centres. In order to address these concerns, I recommend that the walkable catchments be extended to 800m for rapid transit stops and metropolitan centres and to 1,500m for the city centre. Making these changes will help to give effect to the collective central government transport policies / targets that I outline in my evidence below.

2. QUALIFICATIONS AND EXPERIENCE

- 2.1 My full name is Akhylesh Babu Keshaboina. I am the Regional Manager, System Design, for the Wellington region and Top of the South Island at Waka Kotahi. In this role I am responsible for leading and supporting the design of the integrated transport

system with our partners, such as local councils, in the Lower North Island and Upper South Island areas. I have been in this specific role since 2020. However, I've held various transport planning roles at Waka Kotahi since 2014.

- 2.2 As Regional Manager, System Design, I help lead the Waka Kotahi relationship in the Wellington region with iwi and local and central government, to bring spatial and integrated transport planning ambitions for the region to life. I am accountable for ensuring the transport system is designed right from the start. This involves working with our partners to ensure land use and development is integrated with the current and future transport network needs and delivers the appropriate outcomes for the region and New Zealand.
- 2.3 While I am not giving expert evidence, for completeness I have the following qualifications and experience relevant to my evidence
- (a) ME (Civil) transport engineering and planning from University of Canterbury and B Civil ENG from Karnatak University
 - (b) I have led and continue to lead at a political, strategic and systems thinking level which includes stakeholder management, local government collaboration and procurement of large packages of works.
- 2.4 I am authorised to give evidence on behalf of Waka Kotahi.

3. SCOPE OF EVIDENCE

- 3.1 The purpose of my evidence is to outline the Waka Kotahi role in maintaining a safe, efficient and effective land transport network, describe the existing and future transport environment and outline the outcomes Waka Kotahi seeks in relation to the Proposed Wellington District Plan.
- 3.2 This evidence takes into account Waka Kotahi objectives and statutory obligations, as well as prior experience with integrated land use and transport planning and funding across the region.
- 3.3 My evidence addresses the following matters:
- (a) Waka Kotahi statutory obligations and the transport framework; and
 - (b) Planning for growth in the region and the effect of growth on Waka Kotahi operations and investment

4. STATUTORY OBLIGATIONS AND TRANSPORT FRAMEWORK

4.1 Waka Kotahi is a Crown entity whose purpose is to deliver transport solutions for New Zealand. This includes investing:

- (a) In public transport, local roads, pedestrian and cycle networks;
- (b) In the construction and operation of the state highway network on behalf of the government;¹ and
- (c) In integration of the network including with the rail network.

4.2 The functions and operating principles relevant to Waka Kotahi are set out in the Land Transport Management Act 2003 (**LTMA**) and the Government Rounding Powers Act 1989 (**GRPA**).

4.3 The Waka Kotahi statutory objective under the LTMA is:

To undertake its function in a way that contributes to an effective, efficient, and safe land transport system in the public interest.²

4.4 A "Land transport system" is defined broadly in the LTMA as including "*transport on land by any means*" and "*coastal shipping and associated infrastructure*".³ The relevant functions include:⁴

- (a) to contribute to an effective, efficient, and safe land transport system in the public interest...
- (c) to manage the state highway system, including planning, funding, design, supervision, construction, and maintenance and operations, in accordance with this Act and the Government Rounding Powers Act 1989...

4.5 In meeting its objectives and functions, Waka Kotahi is required under section 96(1) of the LTMA to exhibit a sense of social and environmental responsibility and use its revenue in a manner that seeks value for money.⁵ This means Waka Kotahi aims to provide environmentally and socially responsible outcomes in particular transport projects, within the overall funding allocation.

4.6 The above functions reflect a general duty to ensure that all forms of land transport (not just state highways) operate in an effective and integrated manner. For this reason,

¹ Government Rounding Powers Act 1989, section 61 provides Waka Kotahi with the sole power of control for all purposes, including construction and maintenance, of all state highways and has the power to do all things necessary to construct and maintain in good repair any state highway.

² Land Transport Management Act 2003, section 94.

³ Section 5.

⁴ Section 95.

⁵ Section 96(1)(a) and (1)(b).

Waka Kotahi is an approved requiring authority not only for the construction and operation (including the maintenance, improvement, enhancement, expansion, realignment and alteration) of state highways, but also cycleways and shared paths.⁶ It also means that Waka Kotahi has an interest in how local roads (including walking and cycling networks and public transport facilities) are managed and funded. As a consequence, it has a duty to ensure district plans and changes to district plans are not inconsistent (at minimum) with the environmental and social responsibility outcomes it seeks.

Government Policy Statement on Land Transport

- 4.7 Waka Kotahi also must give effect to the Government Policy Statement on Land Transport (**GPS**). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next ten years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery. There is also a focus on investment in “providing people with better travel options to access places for earning, learning, and participating in society”.
- 4.8 Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. When development is completed, it has a long-term impact on the transport network. Changes in land use can affect demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. Likewise, changes in transport can affect land use in both positive and negative ways.
- 4.9 To deliver on the outcomes set by the GPS, Waka Kotahi has developed several strategies which are summarised below.

Arataki - Waka Kotahi's thirty-year strategic view

- 4.10 Arataki – baseline network version is the Waka Kotahi thirty-year view on strategic changes and actions needed to deliver the long-term outcomes for the land transport system. It includes a national view as well as a pan-regional view for the Lower North Island and for Wellington. For Wellington the identified areas of focus for future interventions include:

- (a) Supporting growth in line with the Wellington Regional Growth Framework, including transit-oriented development around key rapid transit hubs, improving

⁶ Resource Management (Approval of Transit New Zealand as Requiring Authority) Notice 1994; Resource Management (Approval of NZ Transport Agency as a Requiring Authority) Notice 2015.

walking and cycling networks and utilising speed management to support active modes in and around growth centres, and to schools and other key destinations;

- (b) Optimising existing networks to maximise usage;
- (c) Completing strategic cycling networks;
- (d) Supporting delivery of the Wellington Mode Shift Plan, including Let's Get Wellington Moving (LGWM);
- (e) Improving capacity, frequency and quality of commuter rail services;
- (f) Improving links between the western and eastern corridors to support network resilience and efficiency;
- (g) Supporting safe and reliable port access.

Toitu te Taiao - Waka Kotahi's sustainability action plan

4.11 Toitu te Taiao is the Waka Kotahi sustainability action plan. This seeks to address the strategic challenge of reducing greenhouse gas emissions and improve public health. This plan seeks to transform sustainable urban transport and liveability by:

- a) Reducing or avoiding the need to travel;
- b) Shifting to modes of transport that are more environmentally friendly; and
- c) Improving the energy efficiency of transport modes and vehicle technology.

Keeping Cities Moving

4.12 Keeping Cities Moving focuses on increasing the wellbeing of New Zealand's cities through modal shift, which will be delivered through three areas of the land-use and transport system:

- A) Achieving good quality, compact, mixed use development that will result in densities that can support rapid/frequent public transport as well as shorter trips between home and work/education/services;
- b) Making shared and active modes more attractive including the quality and performance of public transport and infrastructure for walking and cycling; and
- c) Influencing travel demand and transport choices by providing incentives to discourage private vehicle use or making people aware of other options.

- 4.13 Adopting walkable catchments of 800m for rapid transit stops and metropolitan centres and 1,500m for the city centre will help to give effect to the collective central government transport policies / targets outlined above.

Wellington regional mode shift plan

- 4.14 Modifying the walkable catchments will also help to give effect to the Regional mode shift plan for Wellington⁷ was completed in 2020 to complement Keeping Cities Moving. This plan was endorsed by the Regional Transport Committee and lists focus areas under each of the areas above.

Emissions Reduction Plan

- 4.15 The Climate Change Response (Zero Carbon) Amendment Act 2019 provides a framework by which New Zealand can develop and implement clear and stable climate change policies.
- 4.16 A key change introduced by the Amendment Act is the requirement for Government to set greenhouse gas emissions reduction targets, including specific transport reduction targets, establish a system of emissions budgets and develop and implement policies for climate change adaptation and mitigation.
- 4.17 Transport is one of New Zealand's largest sources of emissions, so decarbonising transport will be critical to the overall success of our collective response to the climate change imperative. The transport chapter of the first ERP⁸ (released in 2022) sets out a comprehensive and ambitious approach to reducing emissions, including for transport.
- 4.18 Through the ERP, the Government has set four (national) transport targets that will support these focus areas and align with achieving the sector sub-targets for transport. This is approximately equivalent to a 41 per cent reduction in transport emissions by 2035 from 2019 levels. The national targets are as follows:
- a) Target 1 – Reduce total kilometres travelled by the light fleet by 20 per cent by 2035 through improved urban form and providing better travel options, particularly in our largest cities
 - b) Target 2 – Increase zero-emissions vehicles to 30 per cent of the light fleet by 2035.
 - c) Target 3 – Reduce emissions from freight transport⁵ by 35 per cent by 2035

⁷ <https://www.nzta.govt.nz/assets/resources/keeping-cities-moving/Wellington-regional-mode-shift-plans.pdf>

⁸ [Aotearoa New Zealand's first emissions reduction plan \(environment.govt.nz\)](#)

d) Target 4 – Reduce the emissions intensity of transport fuel by 10 per cent by 2035

- 4.19 Waka Kotahi is responsible for several actions under the ERP, including some significant targets related to reducing reliance on cars and supporting people to walk, cycle and use public transport. Reaching these targets is closely dependent on ensuring well-functioning urban areas that support better use of infrastructure and more liveable cities to reduce the number and distance of trips that people need to make. Accordingly, amending the walkable catchment provisions as proposed will help to give effect to these targets.
- 4.20 Sub-national targets are in the process being developed for Tier 1 urban areas, including Wellington. These targets are expected to be ready by the end of 2023. While these targets are currently unknown, it is likely that ‘business as usual’ (or a do-minimum) approaches to integrated transport planning will be insufficient to meet the national and (pending) sub regional national targets in the ERP. Hence, amending the walkable catchment provisions as proposed will help to give effect to future regional targets.

5. WIDER LAND USE/TRANSPORT CONTEXT

- 5.1 Wellington City is projected to grow by between 50,000 – 80,000 people over the next 30 years⁹. There are various programmes and projects in place to address the transport needs of population growth.
- 5.2 Regional spatial planning has taken place through the Wellington Regional Leadership Committee (WRLC), a joint committee established in 2021 under the Local Government Act 2002, of which the mayor of Wellington City Council is a voting member of, and Waka Kotahi is an observer in.
- 5.3 The WRLC has produced the Wellington Regional Growth Framework (WRGF), which is a non-statutory regional spatial plan for the Wellington Region and Horowhenua District. The WRGF provides an agreed regional direction for growth and investment.
- 5.4 The WRGF provides for a growth scenario of an additional 200,000 people in the region. To plan for growth, the WRGF has a corridor view of future development areas. Wellington City comprises the extent of the central corridor where one quarter of housing growth is expected to occur under the WRGF.
- 5.5 The objectives and ‘key moves’ of the WRGF include:

⁹ <https://wellington.govt.nz/your-council/plans-policies-and-bylaws/policies/spatial-plan>

- (a) Objective 1 – Increase housing supply, and improve housing affordability and choice;
- (b) Objective 2 – Enable growth that protects and enhances the quality of the natural environment and accounts for a transition to a low/no carbon future;
- (c) Objective 3 – Improve multi modal access to and between housing, employment, education and services;
- (d) Objective 4 – Encourage sustainable, resilient and affordable settlement patterns/urban forms that make efficient use of existing infrastructure and resources;
- (e) Objective 5 – Build climate change resilience and avoid increasing the impacts and risks from natural hazards;
- (f) Objective 6 – Create employment opportunities.
- (g) Key move 1 – Harness growth to make the region’s housing and urban areas more affordable and liveable and provide more housing choice – ‘walkable neighbourhoods’;
- (h) Key move 2 – Make better use of the region’s limited supply of well-located greenfield land;
- (i) Key move 3 – Fully unlock the urban development potential of current and future rapid transit orientated corridors particularly the Let’s Get Wellington Moving corridor;
- (j) Key move 4 – Unlock new areas for housing and urban development and deliver greater regional resilience with a major west-east multi-modal corridor;
- (k) Key move 5 – Deliver transformational housing and development outcomes for iwi/Māori;
- (l) Key move 6 – Address the urban development challenges of climate change and transitioning to a zero-carbon economy at a regional scale.

5.6 The WRLC has also denoted the Let’s Get Wellington Moving corridor Courtenay Place to Newtown as a Complex Development Opportunity (CDO) under the WRLC’s work programme. This purpose of this is to ensure all stakeholders and partners are progressing urban development initiatives to achieve a ‘better than BAU’ result.

- 5.7 LGWM is a joint initiative between Wellington City Council, Greater Wellington Regional Council, and Waka Kotahi. The LGWM work programme includes large investment and urban development opportunities which will impact where people live and how they move around the city. Investing in improving walking as well as cycling and public transport are core components of the programme.
- 5.8 The role of the LGWM programme is to develop a transport system that meets the following objectives:
- (a) greater liveability, including enhanced urban amenity and development;
 - (b) more efficient and reliable transport access;
 - (c) reduced carbon emissions by increasing mode shift away from reliance on private vehicles;
 - (d) improved safety for all users; and
 - (e) resilience and adaptability to disruptions and unplanned events.
- 5.9 To do this, LGWM will deliver improvements in three phases:
- (a) A three-year programme delivering safety improvements for all modes, and prioritising buses and improvements for walking and cycling along key routes in the central city.
 - (b) A City Streets package which supports the wider programme by improving ways for people to bus, walk, or bike on 19 key routes between the central city and suburban centres.
 - (c) The Longer-term programme which will substantially change how people in Wellington move around, shape future growth, and transform the city through Mass Rapid Transit (MRT) and other improvements to the transport system.
- 5.10 Waka Kotahi through the National Land Transport Programme is a co-investor with Wellington City Council for transport infrastructure. Integrated planning of transport investment with land-use through the district plan settings and related growth planning processes such as the WRGF and LGWM ensure that the transport system can function safely for all modes, and also allows for mode shift.
- 5.11 As outlined in the evidence of Mr Cribbens, locating development with good access to amenities and services means that people can live close to the places where they work,

shop, learn or connect with other people will support the role out of the LGWM programme.

- 5.12 Providing for development in the most accessible locations and within walking distance of key services and public transport will contribute to reducing the need for transport investment and help to spread the cost of public transport services.
- 5.13 Waka Kotahi is both the funder of state highways and a joint-funder of local council transport projects (i.e. local roads and public transport services and infrastructure). Therefore, the level, location and nature of travel generated by land use is of direct interest to Waka Kotahi as the leading transport investor in New Zealand.

6. CONCLUSION

- 6.1 In conclusion, Waka Kotahi has a direct interest in the plan change as the location of development strongly influences travel demands. Waka Kotahi has a statutory obligation to contribute to an effective, efficient and safe land transport system in the public interest and must give effect to the GPS. I there respectfully request the Proposed District Plan be amended to follow standard practise in mapping walkable catchments of rapid transit stops and centres.

Akhylesh Babu Keshaboina.

8 February 2023