

19 June 2024

NZ Transport Agency Waka Kotahi

Via email: EmergencyWorksReview@NZTA.govt.nz

To whom it may concern,

Submission on the NZTA proposed changes to the Emergency Works Investment Policies

Rangitikei District Council welcome the opportunity to provide feedback on the NZ Transport Agency (NZTA) proposed changes to the Emergency Works Investment policies. This submission has been prepared in response to the NZTA request for feedback.

We make the comment that the speed of this legislative change makes it difficult to submit fully and assess the impact particularly as it comes at a time when we have effectively adopted our long term plan.

The Rangitikei District covers a large geographical area and RDC is responsible for a disproportionality large road network in relation to the number of rate payers in our district. This makes funding of road maintenance activities under normal business as usual conditions challenging.

Our district is subject to challenging and steep topography with two major rivers on two of our boundaries. The Rangitikei District is vulnerable to weather damage with a history of emergency works claims. Agriculture is the foundation of our district's economy and although some parts of our road network does not carry large volumes of traffic, the economic contribution to the district and the country is substantial and always needs urgent repairs.

With the limited number of rate payers and the already high demand for funding of road maintenance activities, the additional costs of emergency works will be unaffordable to our communities without at least the current level of emergency funding from the National Land Transport Fund. The proposed changes to the emergency works policies will shift responsibility for funding of emergency works to rate payers who are already struggling with the current funding requirements for road maintenance activities and RDC does not see this as a realistic and sustainable solution.

Alternative funding solutions for unexpected weather damage will most likely include redirecting of available funding to substitute any shortfall and this will increase the risk of asset condition deterioration across the rest of the road network. The current road maintenance funding is already less than required and this additional pressure on unforeseen and often large costs will increase the shortfall between required minimum asset management practices and available funding to complete these works.

RDC have the following comments to the questions set out in the consultation document:

Making this place home.

Regarding proposed FAR and qualifying event changes

- 1. How would the proposed changes impact your organisation? For example, your ability to provide local share, the likely impacts for your organisation.**

The proposed changes would have a material impact on our organisation as described above. Affordability is a challenge for our rate payers due to the small number in relation to the size of the network. It is uncertain at this stage how we would provide for the shortfall in local share created by these proposed changes.

- 2. Please tell us if you support the proposed changes or recommend different ways to ensure that NZTA has sufficient NLTF available to cover emergency works.**

RDC does not support the proposed changes.

- 3. What will the proposed FAR changes mean for your organisation's planning for and/or investment in maintenance and resilience? For example, would your organisation invest more in resilience and if not, what incentives would you need to improve the resilience of your transport infrastructure?**

Current funding allocations from the NLTF via NZTA is less than what is required (and has been requested) just to keep the road network assets condition at a steady state. There is no additional funding available to invest in particular improvements such as resilience.

- 4. Are there any transitional issues that NZTA needs to consider in relation to emergency works that occur prior to 1 July 2025?**

RDC suggest that the emergency works investment policies remains unchanged as a minimum with no transitional measures required.

Regarding proposed changes to definitions, processes, and operational policies

- 5. Are there any issues in applying these proposed changes? For example, what further guidance is required? What other changes are required?**

No additional feedback

- 6. Are there any proposed changes that your organisation does not support? Please tell us why**

The changes to the Minor Event Policy where previously Council was able to claim initial clean-up costs for emergency works should remain.

- 7. Are there other policy, planning or process changes that you think are needed? Please tell us what and why?**

It may be an advantage to both NZTA and us as an authority that we work together as sectors to have a policy relating to how we consult and agree on stopping roads for land that is uneconomic to rebuild ahead of events.

Regarding Uneconomic Transport Infrastructure Policy

8. Are there any other issues with this policy that you think need to be addressed?

No additional comments

9. Are there any other forms of access you think the NLTF should fund that are currently ineligible? For example, cable pulley systems to transport goods across rivers where bridges have been washed out.

No additional comments

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Andy Watson', is positioned above the printed name.

Andy Watson

Mayor Rangitikei District Council