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Dear Madam/Sir

Feedback – Sounds Future Access Study – Engagement by Council

This submission comments on the MDC Consultation process concerning the Sounds Future Access Study (FAS) carried out by Council with the release of Council's FAS Engagement document and associated background technical papers on 9 June 2023. This was followed by a stakeholder's workshop on 13 June and then various public drop-in sessions at diverse locations ending 28 June. It is made on behalf of the Kenepuru and Central Sounds Residents' Association (**Association**).

Introduction

1. The Association is a voluntary community organization with scarce resources that nevertheless endeavors to represent the interests of our many members (currently around 290, mainly household members) on a variety of local issues.
2. From the Association's viewpoint the primary outcome of the FAS process is the retention of the Kenepuru road network. This network is a mix of seal and gravel rural roads totaling some 150 kms. It is the lifeline for hundreds of property owners, residents, businesses as well as the main entry point for numerous recreational and other visitors. Accordingly it should come as no surprise that since the Association's inception, back in 1991, the resilience, maintenance and security of the Kenepuru road network has been a core work stream for each committee over the decades.

3. We stress that we are well aware of the severe impacts recent storm events have had on the Marlborough wide rural network, but in this submission we focus on the Kenepuru Road network.

4. We also record that the community has suffered real stress as a result of the consequences of the storm event and disruption to, degradation of and ongoing uncertainty as to the recovery of a resilient road network. However at this point again we want to focus on road recovery matters.

5. It is also important that we place the events of 2021 and 2022 into their context from the Association's perspective with a little more background narrative.

Background to the FAS

6. Around 2017 the Association became aware that the carrying out of basic repairs and maintenance for the Network was no longer functioning well. Simply put the little jobs of maintaining the pipes (culverts) and water tables (ditches) were being left to become big jobs. Storm water management was inadequate. The Association took steps to engage with Council officers, Councilors, the annual plan process around funding network initiatives and to get to grips with the contractual arrangements whereby Council had devolved its operational functions to the New Zealand Transport Agency (NZTA) - now branded as Marlborough Roads (MR).

7. By early 2021 the Association was cautiously optimistic that by working with Council and MR various suggestions as to improving methodologies and operational efficiencies were being taken on board and implemented.

8. The severe and impactful storm event of July 2021 changed all that. However, in due course NZTA had approved some \$85 million for Marlborough wide road recovery and repairs. Kenepuru had been allocated some \$20 million. By the second quarter of 2022 recovery work on the Kenepuru Network was gaining momentum.

9. July 2022 was quite wet in the Sounds (and Marlborough generally). This unfortunately, was followed by a further significant Marlborough wide storm event in August 2022. This resulted in the Sounds wide road network suffering further significant damage. What was encouraging for the Association and the Kenepuru Network was that most of the July 2021 works that had had been completed or partially stabilized did not fail.

10. Unfortunately, Central Government money was now very tight. Council very promptly took the pragmatic step of approaching NZTA to re-allocate the yet to be spent \$45 million of the July 2021 recovery budget to address the immediate Marlborough wide effects of the August 2022 event. As part of this reallocation Council suggested, and NZTA agreed, that Council carry out a comprehensive resilience and sustainability study focused on the Kenepuru and French Pass network¹. This work was to be part of the business case for further NZTA funding. In due course this initiative became the Sounds Future Access Study.

¹ Correspondence between Council and NZTA dated 6 September and 5 October 2022 respectively.

What did the recovery budget reallocation mean for the Kenepuru Network?

11. As at August 2022 of the money allocated to recovery of the Kenepuru network after July 2021 approximately \$5 million had been spent on the road, another \$4 million on overheads and the balance of some \$10 to 11 million was available for reallocation². This meant that work **stopped or never got started** on a number of significant July 2021 event sites, and recovery work on new subsequent significant event sites has not progressed.

12. It is important for Council to note that this reallocation at the expense of the Kenepuru Network and its users generates, in our view, very important issues around equity and fairness. We will, quite reasonably, be looking to Council to acknowledge these issues and take positive steps to compensate the Kenepuru Network as additional funds become available and or reallocated money can be directed back to repairs and recovery of the Kenepuru network. In essence the Kenepuru took a significant hit for Team Marlborough and that should not be lost sight of.

13. In the interim by the Association working closely with Council and MR the road is now much more drivable than it was and some encouraging business as usual maintenance work has helped, we believe, improve the resilience of a fragile Network. Meanwhile we wait for the FAS process to work its way through Council, Central Government, and translate into – we hope - funding and a program of recovery work and implementation. We are somewhat dismayed and concerned by the projected time line for commencement of implementation – **2025**.

Engagement by the Association in the FAS Process

14. In the run up to the release of the Engagement documents the Association had actively participated in the likes of various Council convened public meetings and attended the Key Stakeholders workshop in mid January 2023. Following this the Association made a formal follow up submission. It has also engaged with Council and MR through other forums. It has also continued to work with and advocate with Council and MR on ongoing roading operational matters to improve the resilience and security of the Network, have business as usual repairs and maintenance work carried out in a timely and workmanlike fashion and so on.

15. Since the stakeholders workshop of 13 June 2023 and the subsequent public drop-ins the Association has attempted to come to grips with a fairly complex suite of options - some preferred and some not - trying to assess the logic and case behind these options and the Kenepuru's ranking against these options as well as reviewing the various technical supporting documents - the Program Business case, the Preliminary Natural Hazard Susceptibility report (Geological Assessment), the Economics impact note. This is an ongoing work stream for the Association, but this paper attempts to summarises our approach, concerns and questions at this time.

16. Our focus and intensive effort reflects the importance of the retention and functioning of the Kenepuru Road Network to our members (and the wider community and public).

² Taken from Council supplied data via a LOGIMA information request.

17. Finally, it is important to note the geographical area defined by the Engagement documents as the Kenepuru Study Area includes a number of water access only properties along the Queen Charlotte Sound. These are not our focus. As can be appreciated the focus of the Association is primarily on the Kenepuru Road Network (**Network**) and its users, be they property owners, residents, businesses, service providers, recreationalists, visitors, tourists or other road users.

Structure of this submission

18. In order to assist the reader we note the balance of this submission is divided into various sections as follows:

- Overview comments
- Problem Identification and Multi Criteria Analysis – Inappropriate criteria weightings and inconsistent or unfair assessment of criteria
- Geology or Natural Hazard review – Some comments
- Costings – How were they derived and where are they?
- Economics methodology paper
- Alternative Marine options- some comments
- Conclusions

Overview

19. In this Overview section we briefly comment under various subject headers and as appropriate expand those comments later.

20. In our view the overwhelming majority of members and Kenepuru property owners and residents want continued access to the full Network and a Network that is resilient and secure. They see marine transport options as having been a most useful back up in the aftermath of the likes of the recent storm events, but the time, expense, inconvenience, impracticalities and other limitations pertaining to the day-to-day use of marine transport favor retention and recovery of the full Network.

21. **Road Retention Option(s):** Accordingly, there is much **that is positive** for the community about the emerging preferred option of Council for the Kenepuru Road Network – notably the accommodation of road access going forward with most of the Network to be built back with targeted improvements.

22. This option seems to envisage a reasonably high degree of service level for users. Trucks up to 44 tonnes over most of the Network and we have been advised that in terms of length restrictions these may be eased with the use of a permit system and pilot vehicles for stock truck and trailer units. This level of service must of necessity translate into a fairly serious road recovery program with multiple retaining wall sections and so on. Perhaps there will be more one-way areas (not a major issue for users).

23. However, we hold quite some concern over the emerging preferred option for the length of road between Kenepuru Heads and Portage. The emerging preferred option for this length of road is given as Accommodate/Retreat - with no improvements and essential repairs only. This appears to amount to a preferred option of consigning the road to abandonment. This is bewildering given it seems to us that this particular length of road is as resilient, if not more,

than a lot of the other Sounds roading³. There is no differentiating hazard in the FAS hazard report nor any other data or basis (that we could find) that could possibly justify differentiating this length of roading to anticipated abandonment as a preferred option. This is all the more bewildering given this length of roading effectively links the entire Outer Sounds roading network to the Linkwater-Portage Rural Connector road and to the State Highway network.

24. It seems to us that the equation here is one of the imposition of very significant economic costs and losses to hundreds of properties and businesses across a vast area of the Kenepuru/Pelorus peninsula through the loss of access to a Rural Connector road and this for the sake of saving only the marginal additional cost of accommodating this particular length of the road with, at the least, a repair and targeted improvement program in common with the balance of Kenepuru Road.

25. Council needs to smartly front up and explain, in a coherent manner, why such a neglectful approach to this particular length of road, for the sake of a relatively small marginal cost, has been put up as an emerging preferred option?

26. Then there is the question of cost - an astounding \$400,000 per kilometer. As can be seen from paragraphs 8 to 12 above this is not easy to reconcile with the budget and experience from the July 2021 event – albeit those funds are still not expended as planned. We have been assured this cost estimate is just a “best guess” at this stage, but there is no detail in the documentation as to even how the “best guess” was derived. Whilst it is tempting to put to one side the more relatively expensive Road Access option, we have concerns given the significant gaps in the documentation as to the process by which it was passed over for the Kenepuru Network. We consider these and other aspects in a little more detail later.

27. Multi Criteria Analysis: From what we understand of the NZTA assessment process the Problem Identification and Multi Criteria Analysis (MCA) is a critical part of their funding decision. Accordingly it is concerning that our review has pointed to what we see as fundamental flaws in the MCA criteria weightings and to anomalies in the “scores“ that have been assessed for the various categories - and thus in the selection of the preferred option as derived. We will discuss these concerns and queries in a little more detail below bearing in mind we are awaiting more detail of this process from various information requests.

28. Geological Assessment: New Zealand is a young, geologically speaking, country with a variety of common natural hazards. Earthquakes, volcanic activity and as recent storm and Cyclone events have shown NZ contains a number of highly erodible soil/rock types. Examples include: the mudstones of Te Tairāwhiti/Gisborne and Northern Hawkes Bay and the clays of the Coromandel. It is thus no surprise to find the Sounds area also contains some of these susceptibilities. We will discuss our concerns with where the natural hazard assessment has taken the Kenepuru in terms of the MCA etc but not, for example its close neighbour the Queen Charlotte area and how that may have unfairly impacted on the MCA and the general thinking as to the choice of the preferred option by Council.

³ Member observations are that this length of road carries a relatively smaller degree of residual damage from the 2021 and 2022 events than other parts of the Network. It is also not signalled out in the Hazard Adaption Pathway analysis as being particularly prone to large land movement from earthquake or storm events (per page 32 FAS Engagement Document June – July 2023)

29. **Costings - approach and logic:** We were staggered by the estimate of around **One million dollars per Kilometer** for the Road Focus option. Accordingly we spent some time looking for the detail behind the costings for the three road centric options developed by Council and its consultants. **In short there is none.** We are hopeful of receiving some more detail from various information requests but in the interim will comment a little more on this aspect as – at the end of the day – **money talks.**

30. **Marine Options:** We stress the Association was appreciative of the quick response after the July 2021 event leading to the prompt installation of a robust new useful barge ramp at Fish Bay and the more “so so” barge ramp installed at Torea Bay, as well as the subsequent improvement work we understand has occurred at the Double Bay barge ramp. These have proved useful back up options. However what is proposed envisages a more extensive set of new and upgraded marine hubs. Unfortunately little detail around the level of costing, funding sources and rationale for this investment is supplied. We will comment a little more later, noting that we are still awaiting a response to various information requests around this aspect.

31. **Economic Assessment:** This is a short but dense mathematical equation rich paper. As far as we can ascertain it merely sets out a methodology, aspects of which seem questionable or have important definitions lacking. For example; Why has a total economic cost and loss of a loss of road access not been given? Why and what discounts are applied to costs for perceived bias? The paper recognizes the loss of property value through loss of road access however the note suggests that loss of property value should be discounted back by 30 years as events may occur in the future. This seems to over-look the fact that loss of property value will arise at the point that roading access decisions are made, not if or when future storm events occur.

32. Again we are waiting on various information requests asking if this methodology was in fact used and if so the accompanying detail in order to assist Council with critiquing this approach and its consequences as to choice of option.

More Detailed Comments – Multi Criteria Analysis (MCA).

33. Given the importance of the Problem Identification and the MCA analysis in the arriving at the preferred option we have concerns about the detail of the approach – based on what we could glean from the FAS documentation. In a nutshell our concern is that consciously or unconsciously bias may have crept in taking the Network away from the more road network retention desirable options of Road Focus and Road Access.

34. We see two fundamental issues with the Problem Identification and the MCA. Firstly, the weightings that have been applied to the various factors in the MCA. Secondly, inconsistency or unfairness in the scoring of the various factors across the different roading corridors.

35. **MCA Weightings;** The approach taken effectively assigns 40% of the MCA outcome to reduced disruption and improved resilience of transport assets and access whilst on the other hand the social and economic impact of the different transport solutions to the users (public, community, service people etc) is weighted at just 13.5%. This means that the MCA inherently prefers solutions that simply reduce disruption⁴ more than it values what the transport users (the public, residents, property owners, service people, recreationalists etc.)

⁴We see improved resilience of assets and reduced disruption as effectively the same thing in this context – i.e. in an analysis of road vs marine transport solutions.

actually value most overall – being transport efficacy. That is, the convenience, cost efficiency and practicality of the overall transport option. For Sounds roads that is the ability to freely move around within the community with everyday freight and goods and as well being able to move in and out of the Sounds along with standard carriage such as bulk groceries, hardware, building supplies, white ware and furniture as and when needed.

36. Put another way, road users see disruption for road repairs or recovery work (i.e. a less ‘resilient’ access system) as being of significantly lesser concern than a transport system that comes with a very significant loss of overall transport efficacy - such as marine access.

37. Through valuing reduced disruption or ‘system resilience’ higher than transport efficacy the MCA thus produces what we see as false or fundamentally flawed outcomes.

Inconsistent or Unfair Assessment of Different Roding Corridors

38. KCSRA have undertaken a sensitivity check of the MCA table and identified significant inconsistencies between the ratings applied to the Queen Charlotte Drive and Kenepuru Roding Networks. These two areas are seen by the Association as comparable based on their close proximity, similar geological make up and similarity of land slip events (if not more pronounced history for Queen Charlotte Drive) in the last two storm events.

39. The Association replicated the spreadsheet used in the FAS so that numbers could be reviewed to determine the differences and the high scale of the differences. The differences have been shown as percentages, to make it easier to review.

See the table below for the differences.

8. Multi Criteria Analysis Evaluation										
SOUNDS FUTURE ACCESS PROGRAMME BUSINESS CASE										
Theme	Investment Objectives			Achievability	Opportunities and Impacts					
Criteria Number	40%			30%	30%					
Criteria	1	2	3	4	5			6	7	8
	Improve ...resilience by providing travel alternatives	Reduce frequency and duration of disrupted access	Improve resilience of the transport assets	Technical Difficulty	Social and Community Impacts			Environment Effects	Climate Change Mitigation	Supplier capacity and capability
					Final	Community Focus	Business Focus			
	20%	30%	50%	100%	45%	0%	0%	30%	15%	10%
Total Weighting	8%	12%	20%	30%	14%	0%	0%	9%	5%	3%
Road Focus										
Queen Charlotte	1	1	2	-2	3	3	3	1	-3	1
Kenepuru	1	0	-2	-3	2	2	-3	1	-3	-2
%Difference	0%	-17%	-67%	-17%	-17%	-17%	-100%	0%	0%	-50%
Road Access										
Queen Charlotte	1	1	2	-2	3	3	3	1	-3	1
Kenepuru	2	-1	-1	-2	1	2	-3	1	-2	-1
%Difference	17%	-33%	-50%	0%	-33%	-17%	-100%	0%	17%	-33%
Balanced										
Queen Charlotte	1	-1	1	-1	2	2	2	1	-2	1
Kenepuru	2	2	0	-1	0	1	-2	1	-2	-1
%Difference	17%	50%	-17%	0%	-33%	-17%	-67%	0%	0%	-33%

40. The first significant inconsistency is Business Focus – being a 100% difference, where Queen Charlotte receives a +3, which is the highest possible score, whilst Kenepuru received a -3, which is the lowest possible score.

41. It is difficult to rationalise the assessment of the "Business Focus" criteria between the two areas. It could be argued that the business focus for Kenepuru should actually have a higher number to Queen Charlotte. If Kenepuru is damaged there would be no road access, however both the Road Focus and Road Access option allow for support from marine access (acknowledged not as comprehensive as the Balanced option). It could be further argued that the marine access available for Kenepuru under Road Focus and Road Access options actually provides a more resilient network than that provided for Queen Charlotte under the same options.

42. The next criteria "Improve resilience of the transport assets" is a 67 % difference for Road Focus and a 50% difference for Road Access. The same argument as above holds for this criteria also.

43. There are three other criteria that are at least 33% - 50% further against Road Access or Road Focus relative to Queen Charlotte Road - and that leaves the Association again scratching its collective head as to the rationale behind these significant assessment differences.

44. The assessment of "Technical difficulty" for both roading sections is relatively close - the Association is more supportive of this assessment.

45. It is pertinent to note that if the assessment numbers in just the criteria as noted above are corrected to something a little more aligned, you will get a very clear "**Road Access**" as the preferred option for Kenepuru Road. We do expect Queen Charlotte to be "Road Focused" due to its alternative route in case State Highway 6 is blocked.

46. KCSRA are concerned that the focus for the report has been on “Marine Access”. It is acknowledged that the current marine access has been a successful backup to the Network when it has been damaged in both the 2021 and 2022 storm events. However, the Association does not see marine access as an alternative to the roading Network. It should only **be an emergency backup** to the Network in the event of prolonged road outages from significant storm events.

47. It is the view of KCSRA that if "**Road Access**" was the preferred option there is much more likelihood that NZTA/Waka Kotahi would support funding at a higher contribution rate. KCSRA understood this was the rationale behind engaging Stantec to undertake the FAS.

48. Given the importance of the MCA in arriving at the preferred option KCSRA have significant concerns about the robustness of the approach. It is important to note that the opinion of the Association is based on what can be gleaned from the FAS documentation. To assist in better understanding the significant variation KCSRA has made an information request and is awaiting the same.⁵

49. In a nutshell our concern is that consciously or unconsciously bias appears to have crept in, resulting in an inordinate and unexplained focus away from the more effective road centric options of Road Focus and Road Access.

More Detailed Comment - Natural Hazards Report

50. We have not had the opportunity to have this report reviewed by an independent expert **and recommend** that Council do so. We say this because the authors of the report are commendably up-front about its limitations. Thus the report (at Section 3) acknowledges its limitations and assumptions and notes that verification of validation *is desirable* to confirm the accuracy or *at least the sensibility* of the outputs (i.e. ratings).

51. Clearly this work is *preliminary only*. It is not supported by any site visits or on-site empirical geo-technical work. The only verification or validation offered is reference to the number of faults that have in fact occurred along these sections of road in the 2021 and 2022 events and an historic record of slip events provided by David Miller to Council in a 2015 report.

52. That report seems to suggest that there has historically been only a very small number of slips between Portage and the Kenepuru Heads and not a whole lot more between Mahau and Portage. Most have been around Portage. We refer to Appendix E.4 of the Hazard report.

53. There also appears to be no land instability peculiar to the Network in the Marlborough Sounds Resource Management Plan and there appears to be no land instability issue mapped for the area in the Marlborough Environment Plan.

54. Members have quite reasonably queried why the Kenepuru Network has been singled out as having relatively high natural land instability in the FAS (and in public comments from Council) when the Queen Charlotte area is not so labeled - notwithstanding its close

⁵ A copy of the individual spread sheets/analysis documents used to populate the MCA spread sheet (slide 24 of the FAS Stakeholder Presentation, attached). Obviously with all individual identification details removed.

proximity, similar geological make up and a similar if not more pronounced history of land slip events in the last two storm events.

55. Further on, at page 39 the hazard report notes that inadequate storm water capacity and maintenance has not been assessed and is likely to be a key contributor to human induced instability risk. We **heartily endorse the author's recommendation** that consideration be given to a further assessment of existing storm water management systems. Something the Association has been banging on about for some years and if more promptly acted upon, would, in our view, have mitigated much of the subsequent damage from these two events.

56. In summary:

- The absolute number of faults identified for the Network is alarmist/misleading. Our own analysis suggests that most of these are minor and a lot are difficult to even find. We have also spent some time reviewing table E3 of the report and would like to discuss further the various anomalies and inconsistencies that review has highlighted to date⁶.
- Of **significant concern** is the fact that no focus at all has been directed toward engineering solutions that may count toward or assist to keep a full roading network open into the future. The assumption is simply made that future storm events will continue to occur and that the road network will consequently continue to suffer extreme amounts of damage.
- In particular, there is no analysis of the extent to which future failure may diminish as unstable material finds more natural ground over time and as weaknesses in the road are identified and repaired. As we have noted, the 2021 storm recovery work withstood the 2022 event.
- Neither does any analysis appear to have been undertaken of pragmatic recovery solutions, even ones as simple but as potentially significant as the identification, securing and development of a portfolio of spoil disposal sites.
- The failure to consider these basic road positive factors represents an inherent miss focus of the FAS study – inferring a predisposition towards hazards being found to be unmanageable.
- As noted, the FAS documentation does not even consider the state of the existing water management system nor how that might have contributed to the storm damage. This is a very “tin ear” to the barrage of concern directed to Council and its consultants at each and every public meeting or workshop convened by Council. In the Association’s view there needs to be a proper independent assessment of the Networks storm water management systems, including their maintenance and contribution to the 2021 and 2022 faults. Why keep on repeating the mistakes of the past?
- The emerging preferred option for the Network from Portage to the Heads (i.e. essential repairs only and no investment in water management or other improvements) is most alarming. Moreover, it is not supported by any differentiating hazard data in the hazard report or other evidence in the FAS documentation at all. Indeed, this section of road is in as good a condition, and appears to be as resilient, if not more, than other sections of Sounds roads. This emerging preferred option is unsupported

⁶ It is unclear if there has been some double counting of un-remedied 2021 event sites with the August 2022 site count. Our analysis also included some examination of costs/km, costs per fault etc

and we cannot conceive of any economic, hazard or other basis for the proposed under-investment in this particular length of road.

57. Overall the Association submits that the Stantec natural hazard work is an insufficient basis upon which to make decisions about the future of invaluable and irreplaceable roading infrastructure. More work is required, including a comprehensive water management review and a more positive focus on how future under slip and over slip events might be best managed. Marine access can be developed as a back up, but there is insufficient hazard basis (as well as flawed MCA and KPI analysis) for either marine option (access or focus) to become an alternative current roading outcome for any of the Kenepuru Network.

More Detailed Discussion – the Approach to Costings

58. As noted previously we have been staggered by the indicative costs per kilometer allocated to recovery work for the Kenepuru network the FAS engagement document uses. Following discussion at the workshop and drop-ins it emerged these were best guess estimates. It is **not reassuring** to be told by Council through its consultants – *“do not focus on the actual cost figures just look at the relative weightings of cost between the three road centric options for the Kenepuru network and you will see why we choose the Balanced option”*.

59. We understand the reasoning behind this sweeping approach, but the fact of the matter is the concerning lack of detail as to this best guess approach in the FAS documentation. We have requested but we have yet to be supplied with the approach and detail behind the ‘best guess’ methodology. Accordingly, we are unsighted as to what were the assumptions and logic behind this work.

60. This uncertainty and our quite reasonable and rational concerns around the apparent approach to deriving these indicative costings leaves us most uncomfortable about the lack of clarity as to the apportionment of costs and the differences between the suggested level of service and recovery effort for each road centric option. This is most unfortunate.

61. The PBC report is also reproducing and reporting a lot of errant data on historical road repair and maintenance costings etc. This includes a statement on page 47 that \$30M was spent on K Road 2021 event works (actually only \$5M works and \$5M preliminary and barge subsidies). Further on page 48 it is reporting Kenepuru Network costs that the Association has already shown– and not now disputed by Council - to be over-stated by a magnitude of at least 10 times.⁷

62. The relocation of the remaining July 2021 budget sought by Council in early September 2022 has impacted most unfairly on the resilience of the Kenepuru Network in the sense the July 2021 event sites have largely been left to fare as best they can. Accordingly, it is disappointing that, to date, there is no suggestion in the FAS documentation that there is a fairness and equity component to be factored into the appropriate levels of service and recovery work for the Kenepuru Network.

⁷ MDC Letter 26.05.23 "KCSRA concerns about Manaroa Road costs affecting the MSFAS" and KCSRA email 24.05.23 "Council Costings - Manaroa Road"

63. Further, the Association has not overlooked the fact that under the “Current Status” option the Network is allocated \$10 million. This is almost exactly the amount reallocated away from the Kenepuru. So the question we have is - just what exactly that money would be spent on, in other words what does the Network get for \$10 million under this option?

64. As a general comment we find the lack of detail around the design and level of service for the various options an area of concerning weakness.

65. It is also galling that whilst there is repeated reference to high road maintenance cost in the PBC report, there is no mention at all of the contribution to these high costs that the structure of the current MR Networks Contract (NOC) has had. This is a real sticking point given the Association’s ongoing discussion with Council on this issue. We urge the Council to address this and introduce both more and timely supervision and **competitive tension** into these arrangements.

66. In our view what emerges from the FAS documentation and the costing effort to date is that the approach, methodology, assumptions, data sources and logic used to derive these indicative figures need to be **independently assessed and reviewed**. Pending such a review it is unreasonable to expect the likes of the Association to support or even accept the validity of a business case for an NZTA funding application based on such an approach. The results of such a review need to be publically available in order to restore confidence in the Councils process. We urge the Council to do this.

67. Further the design and levels of proposed service also need to be **independently and robustly** reviewed.

68. Given the uncertainties we have highlighted and general lack of detail provided as to the validity of the approach taken to date the Association wishes to record that it cannot reject the notion that a **properly costed Road Access option** could reasonably apply to the recovery of all of the Kenepuru Network

More Detailed Discussion - Marine Option

69. In terms of improving the marine infrastructure in the Kenepuru the Association was appreciative of the quick response after the July 2021 event leading to the prompt and robust installation of a new useful barge ramp at Fish Bay and the more “so so”, in terms of quality and robustness, barge ramp installed at Torea Bay as well as the subsequent improvement work we understand has occurred at the Double Bay barge ramp. These have proved useful emergency back up options and would continue to do so should road access be impaired by a future weather or other event. Accordingly, **we support** their retention as emergency back up options.

70. However, under the FAS emerging preferred ‘Balanced’ option the FAS documentation envisages that the Torea Bay marine infrastructure (and Torea Bay Road itself) be significantly upgraded. In addition this option envisages a new arterial marine hub be constructed somewhere in the vicinity of Goulter Bay on the North side of the Kenepuru. There is also the suggestion that investment would be made at the Havelock and Picton hubs.

71. We noted the upgrade at Torea Bay with interest but once again we were disappointed as to the paucity of narrative around the level of costing, funding sources and other detail supplied for these "investments" and just exactly what road user stream they were seeking to service – Farm traffic, Forestry, service vehicles? It is difficult to assess let alone support in the absence of detail and a feel for just what background scope work has been done. We were even more surprised that there was little detail given to justify exactly why a new marine facility was required at Goulter Bay.

72. Given the history of dealings the Association has had with Council around the need for Council to face up to the number of maturing pine woodlots whose owners might prefer to use Kenepuru road to take their logs to market instead of by barge we would have thought the FAS documentation would have addressed this aspect in some detail in order to justify the un-quantified investment.

73. As noted there is a complete lack of justification for the emerging preferred treatment of the section of road from Portage to the Heads as essential repairs only (i.e. under-investment). The narrative sheds little or no light as to why the Heads to Portage section has been so distinguished, as to what 'essential repairs' actually means, and as to why such a pivotal piece of the Kenepuru Network would be left without even basic targeted improvements such as critical water management. It seems **positively odd** to talk of investing potentially significant sums to strengthen Torea Bay road and upgrade the marine facilities there but then downgrade to potential abandonment part of the main arterial road route for heavier traffic leading to it!

74. As a consequence we believe the proposed PBC misrepresents how it meets the Government Policy Statement on Land Transport 2021. The draft PBC records a "Strong" pass under this policy (table 4-16 page 56 of the business case report). However, to the extent the FAS directs toward marine access options, as it does for some or all of the Kenepuru Network, it **actually fails** to meet three of the four objectives of this policy – being maintaining or improving transport options to access opportunities, improving freight connections for economic development, and developing a low carbon transport system (marine transport uses significantly more fuel than road).

75. We query the wisdom of facilitating a scheduled passenger or freight service whilst the roading network is open – realistically, given their real efficacy constraints, these services are unlikely to be widely used if the road is open.

76. A scheduled passenger or ferry service between Kenepuru and Havelock would also likely be inadequate in the event the road was closed. This is because passengers invariably travel in and out of the Sounds with a significant amount of goods carriage – whether it be bulk groceries, hardware, rubbish, furniture, whiteware or other supplies etc. For this reason a vehicle is invariably required - meaning that marine access will in most instances only be practicable if via a vehicle on a barge or ferry.

77. However a barge or ferry service operating out of Havelock is unlikely to be cost effective or efficient – given the time needed for a barge or ferry to travel a Kenepuru to Havelock route and the very limited vehicle capacity that could thus be facilitated. In other words we strongly suspect no real analysis has been done in terms of catering for the hundreds of vehicles a day that would need to be moved by sea at peak times to maintain social and economic activity levels.

78. The Association is concerned with the feasibility of the initial and long term funding of marine hubs and water transport options generally. No light was shed as to if Central government funding was available, other than the suggestion that the Department of Internal affairs had upgraded facilities at the Chatham Islands once upon a time. Whilst there was some conflicting advice at the drop-ins and workshop it seemed that NZTA would not be a source of funding. We are waiting clarification on this important point.

79. We suspect the ongoing cost of maintaining an extensive series of marine hubs will prove more of a direct cost to Council (and thus ratepayers) than improving the roads and funding regular and timely maintenance away from the expensive NOC contract approach – e.g. using more ‘tailor made’ pragmatic maintenance solutions such as engaging locally based contractors and equipment etc.

80. In conclusion the FAS documentation does little to assist the Association in finding any real comfort that marine options, other than as emergency back up, are viable and appropriate.

Conclusion

81. It is clear that there has been a lot of work over a long period of time put into this study. We commend the undoubted effort put to render the complex and extensive suite of background documents into a more accessible form via the preparation of the overarching FAS engagement document. You will appreciate that we have had much less time to consider, review, analyze and discuss the FAS documentation bundle but as can be seen from our submission there does appear to be a number of critical factors in the study that, as a residents committee, we are struggling with.

82. These include;

- what we see, with all due respect, as fundamental flaws in the all important MCA criteria weightings and to anomalies in the “scores“ that have been assessed for the various categories - and thus the selection of the preferred option as derived.
- The proposed treatment of the length of road between Kenepuru Heads and Portage under the emerging preferred option for this length of road is given as Accommodate/Retreat - with no improvements and essential repairs only. Again, with all due respect, we struggled to find the differentiating hazard in the FAS hazard report to justify anticipated abandonment as a preferred option.
- The emerging preferred option envisages a reasonably high degree of service level for users with trucks up to 44 tonnes over most of the Network and eased length restrictions. This level of service must of necessity translate into a fairly serious road recovery program and it is unclear if the preferred option accommodates that. Rather the **Road Access option** seems more appropriate.
- We are unable to grasp why there is an absence of any focus directed toward engineering and design solutions that may count toward or assist to keep a full roading network open into the future.

- Overall the Association submits that the Stantec natural hazard work is an insufficient basis upon which to make decisions about the future of invaluable and irreplaceable roading infrastructure. More work is required, including a comprehensive water management review and a more positive focus on how future under slip and over slip events might be best managed.
- We note the explanations given as to why there is no meaningful documentation of the basis, scope or methodology behind the derivation of the FAS indicative costs for each option. However, we strongly urge Council that a robust independent review and verification of the same be undertaken to inspire confidence in the business plan to be developed when seeking funding from NZTA/Waka Kotahi.
- The now existing marine infrastructure for the Kenepuru is seen by the Association as useful emergency back up infrastructure. However the FAS proposals to expand the investment in this area are lacking in detail and need further work and research to justify both their initial cost and ongoing maintenance costs.
- In short, after reviewing the natural hazard report, the PBC and all other information provided, there is no basis made for any solution that would anticipate consigning parts of the Kenepuru network to marine access only. That would, in our view, simply be a step back in time that would only stand to be regretted in the future.

We would welcome the opportunity to discuss these issues further and reach common agreement.

Yours sincerely



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