

Attachment 3

Submissions from Individuals and Organisations

Contents

AKBIDS	3
Atlas Concrete	7
Auckland Business Forum	13
Auckland Grey Power.....	22
Auckland University of Technology.....	25
Avanda Group Ltd.....	27
Blind Citizens NZ	30
Britomart Group of Companies	37
Buckleton Beach Residents' Association	52
Bus & Coach Association	53
Business North Harbour	56
Campaign for Better Transport	69
EMA.....	72
Federated Farmers	77
First Union	88
Getting Auckland moving:.....	90
Goodman Property Trust	94
Greater Auckland.....	95
Greater East Tamaki Business Association Inc.	98
Horticulture New Zealand	102
Kiwi Property Group Ltd.....	121
KiwiRail Holdings Limited.....	124
Ma Development Enterprises (MADE Group)	130
Movement.....	132
National Road Carriers Inc	138
New Zealand Walking Access Commission Ara Hikoī Aorearoa.....	146
Newmarket Business Association.....	150
North Shore Aero Club.....	156
Northern Region Young Nats.....	204
NZAA.....	205
Parnell Business Association.....	226
Ponsonby Business Association.....	234
Precinct Properties New Zealand	236
Property Council New Zealand	238
Rosebank Business Association	248
Sam Warburton.....	251

Stride Property Limited	291
Sunnynook Community Association	303
Talking Southern Auckland	304
Te Whau Pathway	322
The Onehunga Enhancement Society Inc.	324
Turnstone Capital NZ Limited.....	329
Turnstone Capital NZ Limited, Warkworth Trading Company Limited and others.	331
Universal Homes Ltd.....	333
University of Auckland	358
Waikato Regional Transport Committee.....	360
Waitakere Ranges Protection Society	364
Waitemata Low Carbon Network	367
Walk Auckland	374

AKBIDS

BUSINESS IMPROVEMENT DISTRICTS OF AUCKLAND

11 May 2018

Auckland Regional Transport Committee
C/O Auckland Council
Private Bag 92300
Auckland 1142

rltp@at.govt.nz

Submission to Proposed Regional Fuel Tax and Draft Auckland Regional Land Transport Plan 2018-28

Introduction

AKBIDS – the Business Improvement Districts of Auckland - is a collective of BIDs that come together to give feedback when required as ‘one voice’ at an Auckland regional level.

There are currently 48 BIDs in Auckland, representing over 25,000 businesses with a combined capital value estimated at \$24 billion. Through the BID programme, Auckland’s BIDs work with the Auckland Council to improve the local business environment and grow the regional economy.

The Auckland Regional Transport Committee is seeking feedback on the Proposed Regional Fuel Tax and Regional Land Transport Plan 2018-28. Your on-line form sets out four key questions.¹

Given the short timeframe for this consultation for a plan of such pivotal importance to Auckland, AKBIDS hasn’t been able to reach consensus on the funding mechanism for the RLTP in its entirety, however, our feedback on these questions is set out below.

In summary:

- we agree that rapid population growth in Auckland has brought with it significant transport challenges and we support the focus in your proposals on public and active transport, which will free up road capacity;
- our preference is that demand management of our existing transport network be a key solution (following ‘user pays’ approaches, such as congestion charging);
- although AKBIDS initially supported the proposed RFT; the government’s proposed fuel excise duty increase and equivalent road user charge increases, has caused additional concerns. Individual BIDs will make their own submissions on the RFT.
- we are concerned that the significant works planned (such as cycleways and light rail), will result in disruption detrimental to businesses and we ask that any disruption be properly mitigated (and transparently funded through a development response budget)

¹ See <https://at.govt.nz/about-us/transport-plans-strategies/regional-land-transport-plan/>

- road corridor improvements together with enhancing network capacity are a priority for us to make better use of the existing transport network and decrease travel times through key routes and corridors.

Question (1) – Draft Regional Fuel Tax Proposal

Your on-line consultation says that without a Regional Fuel Tax (RFT), the funding available will only cover renewing our existing transport network and the projects we have already committed to, eg the City Rail Link. You say that to enable you to deliver projects that improve congestion, public transport and road safety, you recommend an RFT of 10 cents per litre plus GST (11.5 cents). You have asked for our opinion on this proposal, and especially if we support it, are neutral or oppose this proposal.

We agree with your assessment that rapid population growth has brought challenges, including increased congestion, reduced accessibility, increased deaths and serious injuries on the road network, and increasing negative impacts on the environment.² We also accept that we are not going to address this problem simply by building more roads. Demand management of our existing network has to be a key solution, especially creating priority for freight and delivery movements.

We do recognise the need to raise more funding for transport projects and services.

Our preference is to introduce initiatives that both manage demand and raise funding equitably as soon as possible (such as congestion charging), balanced with investment into affordable and more frequent public transport in order to effect sustainable behavioural change.³ This is important to support business and employment growth in line with population growth.

In the interim, while we initially supported a regional fuel tax of 10 cents per litre (plus GST), the previously unannounced additional 9-12 cent per litre national fuel tax (to be brought in over the next three years) will place a further unexpected financial burden on business. This is likely to cause a supply chain knock-on effect that may deliver unintended consequences such as price rises on consumer goods and services.

AKBIDS have not been able to reach a consensus on the RFT and will make their own submissions on this.

Question (2) –Regional Fuel Tax Projects

Your on-line consultation says that you are proposing to spend the Regional Fuel Tax (RFT) on various programmes and projects, including: (1) Bus priority improvements; (2) City centre bus infrastructure (facilities); (3) Improving airport access; (4) AMETI Eastern Busway; (5) Park and rides; (6) Electric trains and stabling (storage facilities); (7) Downtown ferry redevelopment; (8) Road safety; (9) Active transport (walking and cycling); (10) Penlink; (11) Mill Road Corridor; (12) Road corridor improvements; (13) Network capacity and performance improvements; and (14) Growth related transport infrastructure (transport services and facilities for new housing developments). You have asked how important these projects are for us.

While individual BIDs will comment on specific projects, collectively we support the shift of focus to public and active transport. Our support is based on modelling and business case evidence supplied by Auckland Council and their agencies, which indicates investment across public and active transport modes will free up road capacity, especially for freight and business traffic.

However, our learnings from recent examples mean that we hold major concerns with the significant works planned (such as light rail) and some of those already underway (such as cycleways) that there will be harmful disruption to businesses during construction and over the longer term. In the interests of the Auckland economy, it is of utmost importance to us that a

² See *Draft Auckland Regional Land Transport Plan 2018-28*, page 3.

³ One concern we have with a regional fuel tax is that some people who will use the Auckland motorway system (e.g. driving into Auckland from the regions or driving through Auckland), will purchase fuel outside Auckland and avoid the tax.

comprehensive strategic development plan be implemented so that any business disruption be identified, minimised and avoided where possible through careful project management and adequately funded initiatives be designed and actioned to remedy and mitigate any disruption that is unavoidable.

While each BID will be responding as they believe necessary to their own individual priorities, overall, we have identified (Item No. 12) Road corridor improvements as well as (Item No. 13) Network capacity and performance improvements, as being very important to all BIDs.

With regard to road corridor improvements, we agree that congestion on the arterial network is a significant concern, especially congestion on the freight network. While we agree that corridor improvement is important, we ask that the emphasis be first on improving connections to existing urban areas, the efficiency of existing urban corridors and improving access to the Ports of Auckland port and Auckland Airport.⁴

With regard to network capacity and performance improvements, we agree that Auckland needs to make better use of its existing transport system to increase the number of people who can travel through key routes and corridors. We also support Auckland ensuring that the operation of existing transport infrastructure and services are optimised. The efficiency and coordination of traffic signals must be improved to enhance throughput and reduce delays. More dynamic traffic lanes must be introduced to improve peak traffic flows, and give priority to freight movements on key freight connections.⁵

Question (3) – Regional Land Transport Plan

Your on-line consultation says that Auckland's recent significant population growth has increased demand on the transport system and caused challenges that need to be addressed over the 10 years of the plan. These issues include safety, congestion, decreases in accessibility, impact on the environment, support growth in the region. You have asked whether we think you have correctly identified the most important transport challenges facing Auckland.

While we agree overall with the challenges you have identified (safety, congestion, decreases in accessibility, impact on the environment and supporting growth), as you also note, improving network capacity and performance by making the most of the existing transport system is key.

You have properly said that this must focus on optimising the transport network through targeted changes, such as improving the coordination of traffic lights, the use of dynamic lanes at peak times, and removing bottlenecks to mitigate congestion. Maximising the benefits from new technology and taking opportunities to influence travel demand are also important, as well as introducing pricing to address congestion as soon as possible.⁶

Collectively, improving network capacity and performance has been identified as the highest priority transport challenge in this joint submission, followed closely by the other factors outlined in the Plan.

Question (4) – Funding Activities

Your on-line consultation asks us to indicate how important the following areas are to us: (1) Safety; (2) Public transport; (3) Walking and cycling; (4) Supporting growth areas; (5) Environment; (6) Network capacity and performance; and (7) Corridor and roading improvements. You have also asked if there are any other projects or activities we think should be included.

Again, as noted above, overall we believe network capacity and performance as well as road corridor improvements are very important, with the remaining areas also being important to us

⁴ See Draft Auckland Regional Land Transport Plan 2018-28, page 45.

⁵ See Draft Auckland Regional Land Transport Plan 2018-28, page 40.

⁶ See Draft Auckland Regional Land Transport Plan 2018-28, page 40.

Conclusions

While we welcome the release of the Regional Land Transport Plan as well as the Auckland Transport Alignment Project Report and the greater clarity this now brings to funding requirements, expenditure and broad delivery timeframes for transport projects across Auckland, we also need more detail on the precise timing and the relative priorities for both the funded and unfunded projects set out in the Plan.

It is also of utmost importance to us that early and clear channels of collaborative communication are established between the delivery agencies (such as Auckland Transport) and individual BIDs as well as key stakeholders in those areas affected by the planned works in order to facilitate a smoother transition and a more efficient outcome for the projects.

**AUCKLAND COUNCIL DRAFT AUCKLAND REGIONAL LAND TRANSPORT
PLAN AND PROPOSED REGIONAL FUEL TAX**

SUBMISSION BY ATLAS CONCRETE LTD

SUBMITTER DETAILS

1. Name: Atlas Concrete Ltd
2. Address for Service:
Postal: C/- Haines Planning
PO Box 90842
Victoria Street West
AUCKLAND 1142

Email: david.haines@hainesplanning.co.nz
3. Contact Person: David Haines
Director
Haines Planning
4. Date of Submission: 14 May 2018

SCOPE OF SUBMISSION

5. This submission relates to the Council's consultation on the draft Auckland Regional Land Transport Plan (ARLTP) and the proposal for a regional fuel tax.
6. The following aspects of the draft ARLTP consultation documents are discussed in the submission below:
 - a) How the traffic congestion caused by the non-delivery of transport infrastructure impacts on business function;
 - b) The prioritisation of capital projects currently listed as unfunded;
 - c) The lack of integration with land use planning in the delivery of land transport infrastructure for those areas undergoing significant growth.

INTRODUCTION

8. Atlas Concrete Ltd (Atlas) owns and operates nine depots, supplying ready mix concrete, pre-cast concrete, aggregate, and other construction-related supplies to the larger Auckland area, but predominantly in the northern part of the city. It also provides concrete recycling facilities. Aggregates are partially supplied through Atlas Quarries Ltd, which owns and operates quarries at Maungaturoto, and near Tinopai. Atlas, through its company, Mt Rex Shipping, provides the sand component for concrete production from its storage and distribution facility near Helensville.
9. As a leading supplier to Auckland's construction sector, land transport is vitally important to the efficient functioning and cost of the businesses. Haulage of the raw materials for concrete batching and haulage of ready-mix concrete product to construction sites are major components of the Atlas business. Haulage of concrete demolition materials and re-distribution as recycled product is another important component of Atlas's business.
10. The funding priorities of the ARLTP will have a significant influence on Atlas's ability to produce concrete-related products and provide them to the construction industry in a time and cost-efficient manner. Accordingly, Atlas provides the following submission on the ARLTP, focussing on those aspects of the transport programme which will ensure that the current roading network will allow concrete suppliers to support the construction industry.

TRAFFIC CONGESTION

11. Atlas makes a significant regional contribution to Auckland's residential, commercial, industrial and infrastructure projects by providing a core building product to the construction industry. Therefore, roads need to function efficiently in order to allow the movement of ready-mix (and other) trucks carrying their product. Traffic congestion has the following negative effects:
 - a) Congestion causes delays and extra cost in the supply of aggregates to the branch depots for concrete manufacture, together with supply of aggregates direct to building sites. The industry rule of thumb is that the delivered price of aggregate is twice that of the quarry gate price for every 30 km it is carted. Congestion delays add to this cost;
 - b) Congestion causes the spoiling of ready-mix concrete before it reaches construction sites. Ready mix concrete is manufactured at the batching plant according to prescribed standards. Sand and various aggregate types, cement and a variety of additives are used in the batching process to provide grades of concrete that vary in terms of cost, strength and finish. The wet concrete is loaded into, and delivered to work sites in vehicles which provide further in-transit mixing. In its wet form, concrete lasts only a short time and is a perishable product in this state. Ready-mix concrete

trucks must therefore pour their load within approximately 1 hour of batching. High level access to the State Highway and arterial road network is vital given the nature of the product;

- c) Congestion causes delays in the batching of concrete where truck returns are late for re-filling, resulting in delays on construction sites;
 - d) Congestion delays add to increased labour costs and can also lead to difficulties in retaining and hiring staff;
 - e) Congestion increases wear and tear on haulage machinery.
12. The ARLTP acknowledges that congestion is one of Auckland's most pressing challenges on the transport network. At Page 19, the ARLTP also acknowledges that congestion on the freight network must be addressed by catering for freight movements through currently rural areas experiencing housing development and growth to avoid slower travel times and safety issues. The suggested strategy is to add capacity on the outer parts of the network, to provide new corridors in greenfield areas, improve connections to existing urban areas, and improve the efficiency of existing urban corridors. While these solutions will address congestion, the suggested committed capital projects as identified by Table 1A of Appendix 1 will not address congestion sufficiently to support efficient operation of the construction sector.

FUNDING PRIORITIES

13. Atlas submits that, the following listed projects need to be delivered within the next ten years to reduce freight congestion:
- 1. Provision of the alternative corridor to SH16 to the west of Kumeu, as detailed by the Supporting Growth map at **Figure 1** (No. 3 on the map).
 - 2. Corridor upgrades along the length of SH16 for efficiency and safety.
 - 3. Penlink and Supporting Growth North Projects listed to ensure roading/infrastructure provision in the Silverdale/Wainui/Dairy Flat is undertaken at the same time as urban growth.
 - 4. SH1 intersection improvements in the Warkworth area and provision of a western collector road for the Warkworth township.
14. Atlas also agrees with the concept that in providing better public transport, State Highways and arterials will generally function better as HGV corridors, allowing the movement of concrete products and other production sector goods. Atlas therefore supports those public transport projects that enable a more efficient arterial network.

STATE HIGHWAY 16

15. Of the projects listed for funding above, Atlas has prioritised those projects on State Highway 16. This is because SH16 acts as a vital connection for its sand resource plant at Mt Rex (north of Helensville). This plant serves a number of concrete batching plants around Auckland, as well as the Kumeu batching plant, located at the centre of the Kumeu township.
16. Analysis of SH16 traffic count data has ascertained that a significant sector of the congestion experienced in the last five years can be attributed to the residential housing growth that has taken place at Riverhead and Kumeu. The annual average daily traffic counts for SH16 from Westgate through to Kumeu have increased considerably in the last **five** years where, just south of the Coatesville Riverhead Highway, a 34% increase in traffic numbers has been recorded. North of this, a 23% increase has been noted, with a 20% increase in the centre of Kumeu. North of Kumeu this rate of traffic increase drops to between 8% and 16%.
17. This increase north of Kumeu represents the normal growth and activity of the surrounding countryside areas and the alternative use of SH16 when travelling from the North. There are a lot of heavy industrial, and agricultural freight users of SH16, given the forestry, horticultural, wine and other legitimate rural industries in the area.
18. The only available conclusion is that increased travel demand from new urban areas at Kumeu/Huapai and Riverhead have contributed to such an increase in traffic numbers south of the intersection with Coatesville Riverhead Highway. This is supported by the traffic counts north of Huapai, which only show a moderate increase.
19. It was always foreseeable that as new residential areas were built around Kumeu/Huapai, etc, traffic on SH16 would increase without the corresponding improvements to SH16, or new arterials constructed. Planning documents have for some time promoted the integration of greenfield land development with infrastructure provision, however in practice, this has not occurred, as demonstrated by the current SH16 congestion. It is noted that the congestion maps on pages 20-22 do not include Kumeu/Huapai, leading the submitter to conclude that the current priorities for addressing congestion are within the inner urban areas shown on these maps.
20. In solving freight congestion along SH16, upgrade works to the northern part of State Highway 16 need to be immediately prioritised, particularly north of the Brigham Creek roundabout to the north of Huapai. In addition, the alternative arterial corridor to the west of Kumeu, parallel to SH16 route, must be delivered in the next 10 years. Providing for route protection for this new corridor is insufficient, but building this much needed arterial (as identified as

the dotted line marked 3 on the map below) will enable SH16 to continue functioning as an essential freight corridor.

21. While the Future Urban Land Supply Strategy (FULSS) document proposes sequencing further major development in the Kumeu/Huapai area to between 2028-2032, thereby justifying the delay of the alternative route proposed by the Transport for Future Urban Growth (TFUG) group, the existing consented development for Kumeu/Huapai has created, and will continue to create sufficient traffic delays on SH16 to now require progression of an alternative bypass around Kumeu. The traffic count data outlined above supports this proposition, as does the daily queuing of vehicles in the countryside stretches of the State Highway between the Northwestern Motorway and Kumeu/Huapai.
22. It is submitted that the ARLTP must place this "Supporting Growth" project near the top of the project funding list to ensure that road transport in the north-west can again function efficiently.

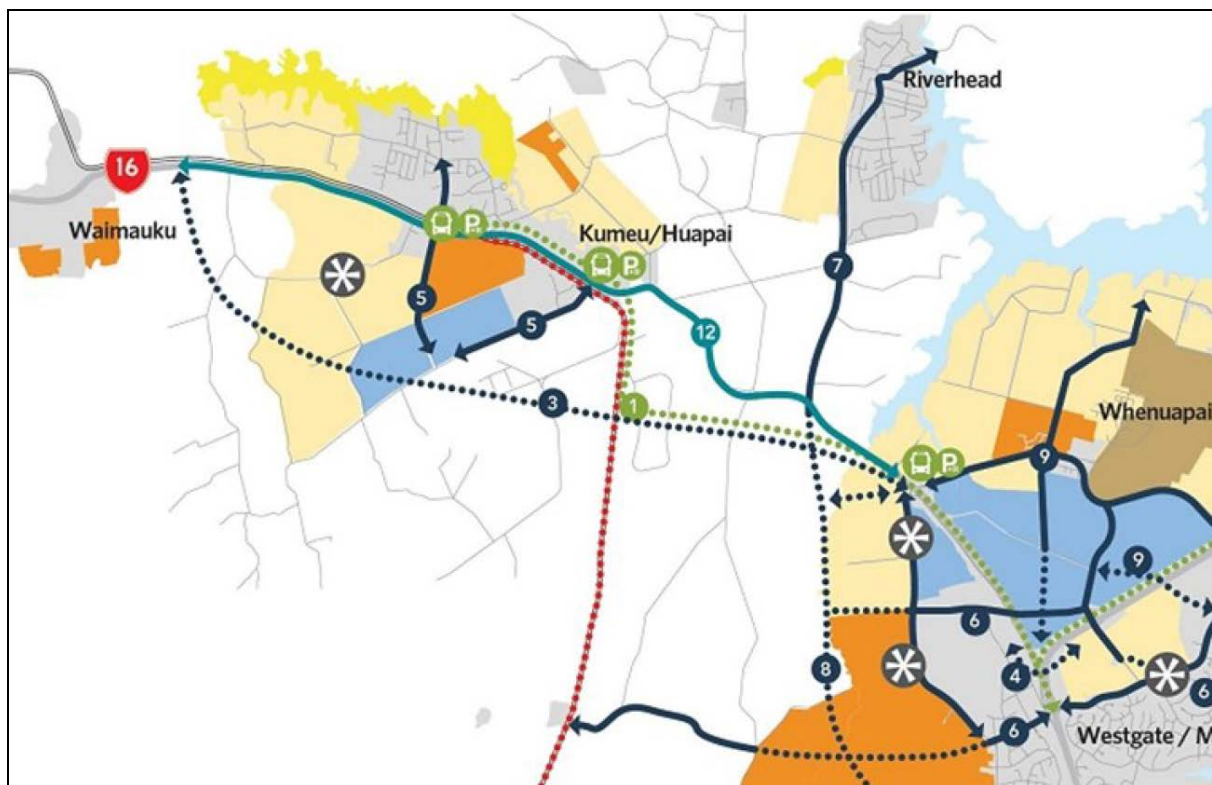


Figure 1: Excerpt from Supporting Growth Network Northwest Map.

CONCLUSION

23. If funding is not provided for the SH16 alternative corridor Supporting Growth project, and other projects as identified above, considerable costs and delays to the Auckland construction industry will result.

24. Atlas requests that the above feedback be accepted by the Council and that the transport capital works priorities be amended as requested.
25. Atlas requests an opportunity to speak in support of the Council's governing body when it meets to consider public submissions on the draft ARLTP.

For and on behalf of Atlas Concrete Ltd.

Yours sincerely

Haines Planning Consultants Limited



David Haines | Director

BTP, NZCD, MNZPI, MRTPI, MCIWEM

1958 AP SUB

AUCKLAND BUSINESS FORUM <i>Outcome: Integrated Transport Network</i>
--

AUCKLAND BUSINESS FORUM SUBMISSION TO THE DRAFT AUCKLAND REGIONAL LAND TRANSPORT PLAN 2018-2028

SUMMARY

The Auckland Business Forum submission recommends the RLTP be strengthened to include:

- A single high-level ‘whole of network’ vision statement (complete with maps) of the transport system we want in place by 2028, and which includes:
 - **A ‘catch-up’ programme** to address deficiencies in the current network – congestion ‘bottle necks’, incomplete corridors, inefficient intersections and road-rail crossings, inadequate and uncoordinated public transport infrastructure and services etc;
 - **Aligned transport investments** to enable Auckland’s urban intensification agenda; and
 - **The next generation of major transport investments** required to enable Auckland’s economy and productivity enhancement and urban transformation (city building, housing and commercial developments).
- Agreement (with Transport Minister Twyford) that Auckland has a “congestion crisis” and is “basically grinding to a halt before our eyes” – see also the RLTP, p17 reference to the 25% loss in road network performance in the three years to 2017, and requires immediate urgency to be addressed head-on.
 - In our view the best immediate way forward is a congestion tax using proven technology (gantry system to read number plates or eRUC) geared as a tool to manage demand (i.e. ease congestion) and raise the revenue for an accelerated programme to provide Auckland with a first-class road network backed by world-class public transport infrastructure and services.
- A commitment to bring forward with urgency other alternative revenue raising options and in particular to note that a Public Private Partnership (PPP) model is proposed for the introduction of a mass rail transit system in Auckland, with revenue streams likely through a system of value capture and targeted rating.
 - A similar strategy to bundle key roading projects to a scale to make them immediately attractive for funding through a PPP mechanism would be supported by the Forum – e.g. the full Mill Road extension corridor, and the bundling of the 3-lane widening of SH1 Albany to Silverdale and the Penlink and selected other North sector transport projects, and note
 - Form members believe there are strongly institutional and international funding sources available to help procure and deliver Auckland’s major transport projects if brought to scale.
- An immediate start on the ‘ready to go’ projects listed in the RLTP – Mill Rd (Stage 1), Penlink, SH20B widening, WRR completion and Northern Corridor busway;

- A full list and timeline to progress other critical projects needed by 2028 – and in particular the reframed East West ‘freight’ Link, SH1/18 Grafton Gully, next Waitemata Harbour Crossing, a new Karaka to Weymouth connection, linking SH20A and 20B, and key supporting improvements - road-rail level crossing separation before CRR opens and a substantial expansion of multi-tower park-and-ride infrastructure and feeder services to encourage uptake of public transport and a move away from a city where single occupant vehicles are the dominant mode of travel to-from work.

INTRODUCTION

1. The Auckland Business Forum welcomes the opportunity to submit on the Draft Auckland Regional Land Transport Plan 2018-20128.

Auckland Business Forum

2. Address for service is:
 - Auckland Business Forum project co-ordinator, Tony Garnier, email: garnierenterprises@gmail.com, phone (09) 368 7772 or Box 28-147, Remuera, Auckland.
3. **The Forum confirms it would like to speak to the submission.**
4. The Auckland Business Forum comprises:
 - *Auckland Business Chambers of Commerce and Industry,*
 - *Employers & Manufacturers Association (Northern) Incorporated*
 - *Ports of Auckland Limited*
 - *Auckland Airport Limited*
 - *Civil Contractors NZ*
 - *Infrastructure New Zealand*
 - *National Road Carriers (Inc).*
5. These organizations represent a cross-section of Auckland industry and commerce whose role includes guardianship of businesses responsible for more than 450,000 Auckland jobs and generating 42% of New Zealand’s gross domestic product (GDP).
6. The Auckland Business Forum (Forum) was established in 2000 out of frustration at the increasing time-cost to businesses (estimated at \$1.3 billion in 2017 – NZIER study) arising from Auckland's worsening traffic congestion and years of inaction and under-investment to complete construction of the city’s long-planned transport infrastructure network to keep pace with Auckland’s growth and development.
7. The Forum’s specific interest in land transport is from the perspective that Auckland’s commercial and industrial traffic, which is critical to the city’s economy, is wholly dependent on an efficient road transport network.
8. The Forum has pursued initiatives to encourage transport infrastructure providers to take an **“integrated network approach;”** i.e. design and implement a transport system, including comprehensive and reliable public transport infrastructure and services, that provides a ‘catch-up’ to the chronic underinvestment that occurred in the second half of last century

and also enables the city to cope efficiently and comfortably with the rapid population and urban growth forecast to continue for at least the next 30 years.

SUBMISSION

9. The Forum's submission addresses the three questions posed in the draft RLTP (p.61) as follows:
- Have we correctly identified the (transport) challenges facing Auckland?
 - Have we allocated available funding to the highest priorities?
 - Have we excluded any projects or activities from the proposed transport programme that should be included?

1) Auckland's (transport) challenges

10. The draft RLTP more-or-less identifies Auckland's major challenges. However, they each need to be highlighted against what transport outcomes, desired benefits, investment and pace of action are required for the programme set out in the RLTP to give Aucklanders confidence that the challenges will be addressed and deliver a better Auckland by 2028; i.e. help ease if not solve our major challenges over the next 10 years.
11. It is not Auckland's rapid population growth that has brought the city's challenges as claimed in the document (p.3) but more that the city is not (yet) responding with urban planning and infrastructure development arrangements and investment of a scale and pace required to successfully cope with the challenges, especially congestion.
12. The point: Auckland's population has been growing at twice the rate of the rest of New Zealand for at least the last 15-20 years and is projected to continue to grow at a rapid pace for the foreseeable future – more than enough time to significantly strengthen our transport governance, and lift the pace of action and investment required to provide Auckland with the 'fit for purpose' network and services Aucklanders are crying out for.
13. If the 10-year RLTP is to have any possibility of getting on top of Auckland's transport challenges by 2028 and meet the demand created by the city's rapid growth (as envisaged at p.3), the document needs to be significantly strengthened – continuing with a 'business as usual' approach won't cut it:
14. The RLTP should include:
- A clear description or outcome statement (complete with maps) of the single joined-up transport network we want to have in place by 2028.
 - A 10-year 'pipe line' work programme (allowing for consent hearings, funding and procurement) designed to ensure implementation of the package on time and within budget by 2028, starting with immediate urgency to:
 - Address Auckland's congestion crisis;
 - Align transport investments with the Auckland's urban intensification agenda; and
 - Bring forward alternative revenue raising and demand management options available to Council and Government to help address the city's transport challenges, especially congestion.

What is the single (integrated) transport network Auckland is seeking to build?

15. The draft RLTP is missing a clear over-arching outcome statement of the single, integrated transport network that Auckland needs to address current issues and meet future growth. What will Auckland's transport network look like and comprise in 2028? It is impossible to tell from the draft.
16. To give clarity and certainty to Aucklanders, potential investors and other stakeholders that Auckland knows what it needs to do to fix its transport system, the plan should clearly set out a high-level 'whole of network' vision statement of the transport system it wants in place by 2028, and which includes:
 - **A 'catch-up' programme:** The deficiencies in the current network that need to be addressed with speed and urgency – congestion 'bottle necks', incomplete corridors, inefficient intersections and road-rail crossings, inadequate and uncoordinated public transport infrastructure and services etc; and
 - **The next generation of major transport investments** required to benefit and enable Auckland's economy and productivity enhancement and urban transformation (city building, housing and commercial developments).

“Auckland has a congestion crisis” – Hon Phil Twyford, Minister of Transport

17. The Forum agrees with Transport Minister Phil Twyford's recent comments when introducing the Regional Fuel Tax (RFT) Bill to Parliament that: *“Auckland's congestion crisis is plaguing the city. Auckland is basically grinding to a halt before our eyes.”*
18. The scale of the crisis and proof of Auckland 'grinding to a halt before our eyes' is reflected in the draft RLTP but the level of the response required is missing. The document notes (p.17) that Auckland's arterial road network has suffered a 25% reduction in performance over the three years to 2017. At that rate, much of Auckland's arterial road network will be gridlocked throughout the working day by 2028.
19. Congestion is now so bad in Auckland that many commercial and distribution firms turn business away if it involves starting a trip or taking on new delivery after 2-3pm. Five years ago, delivery firms could manage 5-6 trips a day; they are now luck to complete 2-or-3.
20. A recent NZIER study concluded that Auckland is losing \$1.3 billion a year in lost productivity every working week (8-hour day, Monday-Friday). (The cost of congestion during weekends and outside normal working hours was not assessed.)
21. Every world city of scale can expect to have daily traffic congestion. But in Auckland's case it is largely a man-made crisis through failure over the past 20 years to invest in planning and building a transport network that gives Aucklanders options for travelling around the city.
22. At the heart of easing Auckland's congestion trend towards all-day gridlock on major roads by 2028 centres on a step-change to provide Auckland with modern (first-world) public transport infrastructure and services, as well as a world-class road network.
23. The RLTP (p.3) identifies an aspiration for Auckland to change from being a city where single occupant vehicles are the dominant mode of travel to one where public transport provides a realistic and practical option.

24. We agree that the projects identified in the document – both to improve public transport services and road network performance – will make a difference. However, missing is clear evidence of the measurable impact they will make to prevent congestion continuing to get worse over the next 10 years as Auckland continues to grow.

Transport and urban planning and delivery need joining at the hip

25. Auckland's Unitary Plan confirmed last year designated three areas - the south (around Drury), the west (around Whenuapai – West Harbour) and north (around Silverdale & Warkworth) – where most of the city's future urban (and business precinct) growth over the next 30 years will be located.
26. The Unitary Plan envisages that around 110,000 new homes will be built and 50,000 new jobs created. However, the key motorways and arterial roads serving these areas are already congested most days. Much of Auckland's worsening congestion directly reflects the urban growth (including business development) underway in these three areas, and also to- from Auckland Airport and along Auckland's Tamaki Drive serving the eastern seaside suburbs (see map, p,)
27. With large scale housing (and local business) developments projected to continue in these three areas, congestion can be expected to get much worse. For example, in the Silverdale area, morning peak congestion queues dependent on the SH1 Northern Motorway – Hibiscus Coast Highway Intersection have grown from around 500m five years ago to now often be up to 5km. In the south, the southern motorway around Takinini is gridlocked from 6.30am most workday mornings.
28. The point: if the target of easing congestion and improving productivity and people's lifestyles are to be achieved under the RLTP, an integrated approach to improve transport access to the three growth areas for moving both people and goods is crucial.
29. We strongly recommend the RLTP include a section highlighting Auckland's urban growth intensification areas and targets, and which includes a clear description of the transport programmes that will be delivered to support this growth.
30. For example, government has announced a mass light rail project between the CBD and west Auckland; there is a busway for serving northern suburbs and which could be extended further north towards Silverdale, but what are the supporting plans to dramatically up-size park-and-ride facilities at and provide feeder (bus) services to the main line 'hub' stations in Drury, Silverdale and west Auckland – there are none it appears.

Why not a funding solution for all Auckland that addresses congestion head-on?

31. We note a Public Private Partnership (PPP) model is proposed for the introduction of a mass rail transit system in Auckland, with revenue streams likely through a system of value capture and targeted rating.
32. A similar strategy to bundle key roading projects to a scale to make them immediately attractive for funding through a PPP mechanism would be supported by the Forum – e.g. the full Mill Road extension corridor, and the bundling of the 3-lane widening of SH1 Albany to Silverdale and the Penlink and selected other North sector transport projects.

33. While the Forum acknowledges Auckland Council debt-to-revenue constraint and supports using RFT revenue as 'a first step' or 'down payment' to kick-start especially the Penlink and Mill Road projects, we would prefer to be submitting on a RLTP designed and resourced to tackle Auckland's infrastructure crises head-on, not an interim measure that by itself raises insufficient revenue.
34. We note that the RLTP's work programme is limited in scope, dictated by 'available' funding, as the document puts it. At a high level, the RLTP needs to clearly state that 'available' funding is insufficient to address Auckland's current transport challenges let alone those in the future.
35. Instead of priority projects being decided by whether funding is 'available'; rather, priority transport projects should be decided on the basis of their support of a wider business case ranking – i.e. not just their Benefit-Cost ranking, but how they reduce congestion, help serve Auckland's rapid growth, unlock whole of life outcomes, drive improved delivery performance, serve customers better (and for PPPs, realise new revenue streams).
36. Once key transport projects are agreed, the funding and procurement model required to deliver them all with speed and urgency should then be determined. Clearly, under current procurement methods there is insufficient funding 'available' to allocate to ALL Auckland's highest priority projects.
37. The RLTP needs to be clear that the RFT is a temporary revenue source while a more sustainable and permanent alternative (or new) source with the scale required to reduce congestion immediately and raise revenue for ongoing investment is determined.
38. In agreeing with Minister Twyford that Auckland is grinding to a halt before our eyes, it is reasonable to ask "do we have 10 years?" Auckland has a crisis on its hands – let's solve it; adopt a crisis-management approach and use the RLTP to message the consequences of our continuing to fail to ease congestion and why we need to give urgency to ease congestion immediately.
39. In our view the best immediate way forward is a congestion tax geared as a tool to manage demand (i.e. ease congestion) and raise the revenue for an accelerated programme to provide Auckland with a first-class road network backed by world-class public transport infrastructure and services.
40. Introducing a comprehensive congestion tax scheme is well within our technological capability. Proven technology (gantry system for reading number plates and/or eRUC) is used in many cities worldwide to both limit traffic volumes and raise revenue.
41. The technology used for collecting revenue at the Puhoi Tunnels and on the Tauranga state highway could easily be installed on Auckland's road network in the next 12-18 months.
42. Forum members indicate there is strong institutional and international funding sources available to help procure and deliver all of Auckland's critical but currently unfunded transport projects through a PPP model – from \$400m for a 4-lane Penlink with busway at the small end to building multi-story park-and-ride facilities at all Auckland's key bus and rail hub stations to the \$3.2 billion-plus that will be needed for the third Harbour Crossing (Tunnels) at the big end.

43. **In summary**, the Forum supports the allocated funding mechanisms set out in the RLTP but strongly recommends that immediate urgency is given to introducing alternative funding sources of a scale capable of addressing Auckland's congestion crisis head-on as soon as possible.

2) Available funding allocated to 'ready to go' projects – immediate 'go' recommended

44. The Forum strongly endorses the funding allocation in the RLTP of three "ready to go" projects and urges Auckland Transport to move them to design and construction stage immediately, and at the same time give urgency to attracting the further funding that will be needed to enable the full benefits of these projects to be released with speed and urgency:
45. **Mill Road Stage 1**– Will help provide additional capacity to the fast-growing south area. However, it is clear that the full Mill Road corridor to Bombay is urgently needed if congestion benefits and relief is to be achieved from Southern Motorway shut downs as have occurred frequently in recent months. Delaying the full project will add to its cost. Use of the allocation to underwrite a PPP for the full link is an option that could be looked at.
46. **SH20B widening from Puhinui Rail Station to Airport with a rapid transit (bus) service** – We strongly encourage it be fast tracked for completion by 2019-20, ahead of the America's Cup and APEC conferences in 2021.
47. **Penlink** - The Forum supports an immediate start. Through our Auckland Business Chamber membership, we will continue to consult with Auckland Transport on how the \$260m allocated in the RLTP and RFT programmes might be topped up and/or supplemented with toll revenue to enable the original 4-lane + busway project to proceed. Ideally the project would be done in parallel with **3-laning SH1 between Albany and Silverdale** and include provision of a park-and-ride facility.
48. The Forum also supports allocations for completion of the **Western Ring Route including SH16 widening**, and the **Northern Corridor improvements – Northern Busway** (including an expanded park-and-ride at Silverdale and new park-and-ride at Redvale, to service the projected Penlink commuters wanting to drive to Redvale to catch an express-bus into the city).
49. The Forum notes and supports the \$58 million allocation to support the implementation of **congestion pricing**. As noted above, we strongly recommend immediate urgency to bring forward this project.

3) Projects and activities that should be included in the RLTP programme

50. As noted above, the Forum strongly encourages the inclusion in the RLTP of the full programme of projects required to provide Auckland with a single, integrated transport network.

51. In our view, the priority package would include the projects that 'available' funding has been allocated as well as the following – but subject to a business case and clear evidence of their benefits, especially to provide congestion relief, either directly or indirectly:

52. **The reframed East West 'freight' Link (EWL)**. Currently, heavily congested local roads carry more than 6000 heavy trucks every working day. We have suggested that that the EWL be done in parallel with the 'Ready to Go' third (and 4th) Main Trunk Rail ((whose funding is direct from Government outside the RLTP process)) and expanded Southdown Rail Freight Terminal. Both the EWL and 3rd Rail have strong businesses cases, and are of the highest priority and urgency, especially as government intends to increase inter-provincial rail freight infrastructure and services (via KiwiRail).

53. Accepting that easing congestion is a key goal of the RLTP, the EWL could be usefully linked with widening the **SH1 Mt. Wellington Highway over-pass** to 3-lanes in both directions. This project is needed to remove one of Auckland's (and New Zealand's) most notorious congestion bottlenecks.

- We also suggest the reframed EWL should be configured to form part of a staged 'whole of route' **East Tamaki to Pakuranga** corridor project.

54. The Forum strongly recommends the RLTP support route protection for the long-proposed **SH1/18 Grafton Gully to Quay Street link (Grafton Gully Stage 3)**. This project is critical to completing the SH18 corridor into the city centre, and vital for removing the about 35,000 vehicles per day (including 4000 heavy trucks heading to-from Ports of Auckland) that travel from Tamaki Drive to the Motorway via lower Parnell local roads (The Strand).

55. Various design options exist for Grafton Gully Stage project (including tunnels under or a bridge over the railway lines between Stanley St and Quay St). We note that the RLTP shows Tamaki Drive to be among Auckland's most congested peak hour routes.

56. Other projects the Forum recommends status updates be considered for inclusion in the finalised RLTP include the often-discussed major projects:

- **Waitemata Harbour Crossing** – has a deadline of early 2020s for weight stress limits for heavy vehicles, trucks and buses (Beca report 2010). The project needs to be integrated with proposed cross-harbour public transport (mass transit) provision. NB: under current planning, it will be 10 years before it can be consented.
- A new **Karaka to Weymouth connection** to the south western motorway, and which includes a rapid transit lane to Auckland Airport.
- **Linking SH20A & 20B** with a turnpike to the Airport, to address freight and general traffic congestion on the routes within the Auckland Airport precinct.
- Selected **rail-road level crossing separation**, especially on freight priority routes – to be completed before CRL opens.
- **Arterial Road improvements** – to focus improvements on improved freight performance with measurable 'economy and productivity enhancement' top of mind.

- Inclusion in mass (rapid) transit network planning for a substantial expansion of **(multi-tower) park-and-ride infrastructure**.

CONCLUDING COMMENTS

57. The Forum agrees with Government that Auckland has a transport and infrastructure crisis and which we should be addressing with immediate urgency to apply new funding and procurement methods of a scale that gives Auckland's businesses and wider community confidence that we are making good progress to solve with speed and urgency.

58. Our suggestions and recommendations on the Draft RLTP 2018-2028 are put forward in the positive spirit of continuous improvement to Auckland's transport system.

Tony Garnier
Project Coordinator

Auckland Grey Power
Po Box 44008
Pt Chevalier
Auckland, 1246

Feedback to Auckland Transport

14th May 2018

Regional Long Term Plan/Fuel Tax

Introduction

Auckland Grey Power has for the past 31 years represented the views of the senior community in advocating for fairness, affordability and access to services, and recently for recognition of a rapidly growing ageing population, that is a key component of the high population identified as a challenge for the future of Auckland city.

We represent over 1,400 members but often speak on behalf of a much wider constituency. Our members range in age from their 50's through to 90's, with a growing proportion over 80.

Executive Summary

What is important for Auckland Transport to recognise is the size of the increase of people over 70 and over 80 many of whom are within Maori and Pacific island communities with less access to affordable and reliable transport options.

The Gold Card provisions are an essential tool to help maintain access to social connectivity and health care so important in preventing social isolation and mental health issues.

However, place making, which includes planning with Local Boards, is vital to ensure seniors can participate with families, youth and engage in the life of their communities.

We would like to see more recognition of transport as an enabler and enricher of people's lives; not only the transport options providing access, but the catalyst for enhancing the liveability of urban spaces.

Age-friendly communities are being developed across the globe, as the rapidly ageing population becomes recognised as a key challenge to the future of cities. The silver dollar will be important to businesses, and so light rail and rapid mass transit systems will deliver the customers, somewhat the way the trams did in the 1950s.

We are looking forward to improved footpaths, cycleways that extend the off road opportunities for grandparents to ride with grandchildren. Light rail, rail to the airport that reduces congestion, and enhances links with Hamilton, and improved busways in the East, along with the other road safety projects are all things we want to see developed.

In giving feedback on the complexity and scale of the budgets is not relevant given we have a lack of high level expertise to unpick what is proposed here.

What is important is that Grey Power's voice, on behalf of the senior community it represents, is not ignored or hidden from consideration, given by 2035 25% of all Aucklanders will be over the age of 65. It will be too late to start the planning for this demographic shift in the middle of the next decade.

Practically speaking the big picture doesn't explain how much change we can expect on the ground. Consequently we have decided not to comment on specific large scale projects, but identify what changes would make a real difference to the quality of life for older people, and clarify how our urban planning could achieve a more age-friendly city, that will see older folk using public transport much the way they do when they visit Australia now, where they do not use cars or taxis much at all.

Our priorities are

1. To urgently improve footpaths for older people to walk about safely, reducing our injury rates.
2. Slower speeds in urban shopping strips, with flashing lights across the road along pedestrian crossings.
3. More signage in shared spaces clarifying responsibilities of all users.
4. Feeder buses are needed to enable older folk to reach arterial roads, to counter the always full after 8 am park and rides, so heavily used by commuters. The walking distances are being increased while our significant numbers within our ageing population have decreasing capacity to cope with these distances.
5. Access to toilets in public spaces and adjacent to train stations and open spaces.
6. To improve lighting in public spaces especially bus interchanges and stops and train stations. More solar installations could be used.
7. Routes that cross the city and provide access to health care, shopping, and social activities are important and need to be increased in frequency and number, not reduced.

Our rationale is simply there are more car owners and drivers in the 50 – 70 age group and many live alone or go out alone, and so become part of those taking small trips of up to 6 km that significantly add to the congestion on our roads. As the population of this age group rises rapidly, it must be made practical for these people to utilise public transport more often. Many of these people have not used public transport here in Auckland for the past forty years, especially males. Those that do will use trains but not buses. So the Light Rail option will be an attractive game changer.

Our priorities are to focus on the practical solutions.

The strategic big picture, if it ignores the rapidly ageing population, will be a huge oversight. Of the ten cities competing with Auckland to be the world's most liveable city, Auckland is the only one that is not "age friendly" or committed to becoming so.

The plan is bold and the fuel tax will be a catalyst to bring about the changes, and development we need. The cost may be high in terms of flow on cost of living rises, once fuel prices rises from other sources are factored in, but overall, we believe the future of the city demands that these changes be made urgently.

Contact People

Jens Meder/Lingappa Kalburghi

Auckland Grey Power Committee

09 845 2525

By email: akhaveyoursay@aucklandcouncil.govt.nz

Dear Mayor

University of Auckland Feedback on the Draft Auckland Regional Land Transport Plan 2018 - 2028

Thank you for the opportunity to provide feedback on the Draft Auckland Regional Land Transport Plan. The University of Auckland and AUT have collaborated in preparing this submission as key stakeholders in the Learning Quarter.

General Comments

The University of Auckland and AUT are generally supportive of the Draft Auckland Regional Land Transport Plan 2018 – 2028 and its focus on safety and access followed by environment and value for money.

All four strategic priorities (safety, access, environment and value for money) are important to our university communities. Collectively we attract some 62,000 students and 8,000 staff into the city from all over Auckland, and further afield. Our students and staff are active public transport users. Numbers of students living in the city and able to walk to campus (currently around 15% of students) are also growing as we develop more student accommodation in the city centre. Affordability, while not as critical as say, safety or access, is still very important to the student body whose ability to earn money is restricted during their time of study. Even if students live in the city centre they still need to travel around the city and to the wider Auckland region to meet their other commitments.

Learning Quarter Priorities

- Better connectivity of the Grafton Gully cycle way and upper Symonds Street.
- Safe, well-lit connections between the Domain Train Station and the City, Grafton and Khyber Pass Campuses.
- A holistic approach to Princes Street and Alfred Street improvements.
- The widening of the Grafton Road footpath outside the Business School to increase pedestrian safety.
- Issues already expressed to Auckland Transport through the Learning Quarter meetings and meetings with the Chief Executives at Auckland Council around changes to bus routes that service our university stakeholders.
- Symonds Street road safety project.
- St Paul Street upgrade including traffic calming measures.
- Mount Street safety improvements including traffic calming measures.
- Wellesley Street pedestrian over bridge upgrade to improve pedestrian and cycle access between AUT campus, Albert Park and Wellesley Street.

These priorities all address issues around safety and access.

Some relevant features about the University of Auckland and AUT:

A large highly educated population

- The University of Auckland has nearly 42,000 students and over 5,000 staff.
- AUT has 20,000 students and 3,000 staff on the City campus.

Internationally networked

- The University of Auckland has close to 7,000 international students from over 110 countries and has strong international networks including international affiliations and formal agreements with 174 universities in 40 countries.
- AUT has close to 4,700 international students from 97 countries.

Significant economic contributor

- The University of Auckland has a capital investment of \$2.9 billion in assets and an annual capital investment of \$139m. More than 12,000 staff and postgraduate students are involved in research, generating more than \$200m in annual research revenue. Auckland Uniservices Ltd. has 1200 active projects with more than 300 firms at any one time. In 2016 it created over 50 licences for intellectual property, 11 businesses to commercialise the University's research and generated more than \$114m.
- AUT has a capital investment of \$1 billion in assets and planned capital expenditure of \$250 million from 2019 – 2021 and \$400 million from 2022 – 2025.

Guardian of unique public buildings

- The University of Auckland looks after a number of historically and architecturally significant public buildings including Old Government House, Old Choral Hall, Alfred Nathan House, the Clock Tower, the Fale and Waipapa Marae.
- AUT has one heritage listed building, Te Ara Poutama Building on Wellesley St East. Other buildings significant to the city and the community are Nga Wai o Horitiu Marae and the Sir Paul Reeves Building.

We look forward to seeing the aspirations of the Draft Auckland Regional Land Transport Plan 2018 – 2028 realised and to working with Auckland Transport and Auckland Council as key stakeholders in the Learning Quarter.

Yours sincerely



Amy Malcolm
Manager, Strategic Relations
Office of the Vice Chancellor
University of Auckland



Suzanne Webb
Director Stakeholder Relations
Auckland University of Technology



Avanda Group Ltd.
E. joseph.z@avanda.co.nz
A. Level 2, 117 Khyber Pass Road, Grafton, Auckland
PO Box 8663 Symonds Street, Auckland 1150

14 May 2018

Draft Auckland Regional Land Transport Plan 2018-2028
Auckland Council
via email: rltp@at.govt.nz

Feedback on the Draft Auckland Regional Land Transport Plan 2018-2028: Avanda Group

Avanda Group Ltd. ("Avanda") appreciates the opportunity to provide feedback on the Draft Auckland Regional Land Transport Plan 2018-2028 ("the ARLTP").

Avanda is a residential property developer in the Auckland and New Zealand housing market with large scale master planned development projects. In Auckland, assets include:

- a) West Edge, New Lynn: potentially 2500 dwelling project;
- b) Onehunga Bay Terraces, Onehunga: 45 terraced unit project;
- c) Hobsonville Airfield, Hobsonville: 510 dwellings project; and
- d) 121 Grafton Road, Grafton: 150 apartment unit project.

Avanda has taken an active interest in strategic and statutory planning as well as construction in the Auckland region. Recently this has included the development of sites identified as Special Housing Areas as well as actively participating in the Auckland Unitary Plan process.

Avanda is a supporter of the City's quality compact growth model and their significant investment of a large site in New Lynn's Metropolitan Centre reflects this support. Avanda recognises that supporting intensification in and around the region's centres is a particularly effective way in which land-use and transport planning can be integrated. By promoting growth around nodes, centres can be more efficiently serviced by the transport system, particularly public transport.

Avanda considers that the ARLTP is a bold strategy, not only in terms of the scale of the \$28b investment proposed but also in the breadth of projects proposed to be funded. In Avanda's view the document inherently recognises a changing view that the region cannot continue to build roads to relieve congestion. A wider view of the transport system needs to be taken to achieve a multi-modal network that improves accessibility for the diverse transport needs for all Aucklanders. Avanda supports further prudent investment in the roading network but is particularly supportive of the additional funding that is proposed to be made available for public transport projects, active modes, safety, and technology initiatives.

Avanda supports the general direction of the ARLTP and provides the following specific feedback on funding priorities as follows:

New Lynn

Avanda are a significant land owner within New Lynn with 11.3ha of brownfield land, being the former Monier Brickworks and Vuksich & Borich landfill site, now referred to as West Edge. These sites are shaded light green in **Figure 1** below. Avanda was attracted in part by the significant investment that had been made in rail and bus interchange in the New Lynn Metropolitan Centre by central and local government.

West Edge site is being progressively developed by Avanda with a portion already under construction for 88 terrace dwellings (shown as light green hatching in **Figure 1**). Future development of the site is likely to include high-density housing and commercial floorspace with feasibility and master planning assessments currently being undertaken.

Avanda strongly supports the proposed Memorial Drive extension (\$8m) to provide direct connectivity from the West Edge site and surrounds to the public transport interchange. This linkage will support the development that is anticipated on the West Edge site as well as users of the future Crown Lynn Park. It is noted that this project is currently unfunded. Therefore Avanda requests that it be reallocated as a funded project to ensure that the full potential of the New Lynn Metropolitan Centre's transformation and the aspirations of Auckland Transport's transit-oriented development (TOD) for New Lynn¹ are able to be realised.



Figure 1: West Edge development site and surrounds

¹ <https://at.govt.nz/projects-roadworks/new-lynn-transit-oriented-development/>

Onehunga Bay Terraces

Avanda owns a 5,570m² site in Onehunga which is currently being developed for terrace housing and apartment units.

Avanda supports the proposed \$69m upgrade of the Onehunga Rail Line to accommodate higher frequency services.

Hobsonville Airfield

Avanda has an interest in the former Hobsonville Airforce Base, partnering with Panuku Development Auckland in the redevelopment of this site for new residential dwellings. Hobsonville is identified as a significant growth node in the Auckland Plan for both residential and commercial activities.

Avanda particularly support the following projects associated with the northwest part of the region:

- Hobsonville Road upgrade (\$16m); and
- New local road crossings(s) over SH18 (21m).

121 Grafton Road, Grafton

Avanda owns a 3,006m² site in Grafton which it intends to develop as a mixed-use development of apartments, retail and community space. Avanda recognises that private vehicle access into the central Isthmus area is constrained by the limited ability to increase the capacity of the roading network. Future growth of this area is therefore dependent on moving people by public transport or by active modes. To that end, Avanda particularly supports the following projects:

- Downtown bus improvements (\$39m);
- Downtown Ferry Basin Piers 3 and 4 (\$17m);
- City Centre bus improvements (\$117m);
- Wynyard Quarter integrated road programme (\$77m);
- Additional EMU rolling stock and stabling (\$396m);
- Downtown Ferry Basin redevelopment (\$57m);
- Park and Ride Programme and enhanced programme (\$51m and \$119m); and
- Light rail projects (\$1.8b).

Avanda understands that it is not intended that hearings be held with respect to the ARLTP, however, if this were to change, they may wish to be heard.

Joseph Zou
Planning Manager





14 May 2018

Auckland Council
Auckland Transport
By email

Blind Citizens NZ

Auckland Branch
2-13 Upland Road
Remuera
Auckland 1050

Phone +64 9 520 4242
Mobile +64 21 983 652
Web www.abcnz.org.nz
Email mary@lansink.co.nz

Draft Proposal for a Regional Fuel Tax and Draft Regional Land Transport Plan FEEDBACK FORM

Feedback must be received by 8pm on Monday 14 May 2018.

Please read the documents available at akhaveyoursay.nz or at any library, service centre or local board office before you give feedback. They have more information about the issues and choices that we want your feedback on. All of the questions below are optional. We encourage you to give feedback online at akhaveyoursay.nz, or you can complete this form and return it to us using one of the options below.

Email

Scan your completed form and email it to akhaveyoursay@aucklandcouncil.govt.nz.

In person

Drop your completed form off at your local library, service centre or local board office.

By post

Place your completed form in an envelope and send it to freepost address: AK Have Your Say Auckland Council Freepost Authority 182382 Private Bag 92 300, Auckland 1142

Name and contact details

Your name and feedback will be included in public documents. All other personal details will remain private.

First name: Mary

Last name: Schnackenberg

Email address or postal address: mary@lansink.co.nz

Your local board: not applicable this feedback is on behalf of members in the Auckland Region.

Is your feedback on behalf of an organisation or business? (If yes, this confirms you have authority to submit on the organisation's behalf)

Yes

Name of organisation or business: Blind Citizens NZ Auckland Branch

The following information is optional but will help us know whether we are hearing from all Aucklanders.

This feedback is on behalf of the Auckland Branch of Blind Citizens NZ. We do not collect demographic profile details about our members. Questions relating to details we do not collect are deleted.

Do you consider yourself part of the following communities?

Disability

QUESTIONS RELATING TO THE DRAFT PROPOSAL FOR A REGIONAL FUEL TAX

To answer the following questions, please read the draft proposal document. All of these questions are optional.

Question 1

Without a Regional Fuel Tax (RFT) the funding available will only cover renewing our existing transport network and the projects we have already committed to, for example the City Rail Link.

To enable us to deliver projects that improve congestion, public transport and road safety, we recommend an RFT of 10 cents per litre plus GST (11.5 cents).

What is your opinion on this proposal?

Support

Other Please comment:

We support the RFT because the income is being raised from users and will go into public transport.

However we seek a review of the maximum fare subsidy for the Total Mobility scheme which has remained unchanged since the last increase in October 2010.

Pages 17-22 of the draft RLTP discuss increased congestion on Auckland roads. No mention is made of increases in taxi waiting times and costs for passengers and the total mobility scheme as well. Effectively the journey length before the maximum subsidy is reached has decreased since October 2010. There is no agreement about the maximum journey length the subsidy should cover. It seems inevitable that the

RFT will lead to an increase in taxi fares. Without a review of and increase to the maximum fare subsidy the current situation for TM users will worsen.

Question 2

We are proposing the RFT funds the projects listed below. How important are these projects to you?

Very important, Moderately important, Less important

Project 1: Bus priority improvements

Very important

Project 2: City centre bus infrastructure (facilities)

Very important

Project 3: Improving airport access

Very important

Project 4: AMETI Eastern Busway

Very important

Project 5: Park and rides

Very important

Project 6: Electric trains and stabling (storage facilities)

Very important

Project 7: Downtown ferry redevelopment

Very important

Project 8: Road safety

Very important

Project 9: Active transport (walking and cycling)

Very important

Project 10: Penlink

Very important

Project 11: Mill Road Corridor

Very important

Project 12: Road corridor improvements

Very important

Project 13: Network capacity and performance improvements

Very important

Project 14: Growth related transport infrastructure (transport services and facilities for new housing developments)

Very important

Any other comments?

We note your commentary for Project 9 Active transport (walking and cycling) is largely about cycling. While we accept all the benefits of cycling, we are increasingly nervous about the concept of shared paths and the need for separation of pedestrians from cyclists who travel much more quickly.

We are not convinced that sufficient emphasis has been given to pedestrian safety around shared paths. We call upon Auckland Transport to use the same consultation process for shared paths that resulted in such a successful design of Shared Spaces.

We are pleased to read more commentary about walking and pedestrian safety in the draft RLTP.

QUESTIONS RELATING TO THE DRAFT REGIONAL LAND TRANSPORT PLAN

To answer the following questions, please read the draft document. All of these questions are optional.

Auckland's recent significant population growth has increased demand on the transport system and caused challenges that need to be addressed over the 10 years of this plan. These issues include:

safety
 congestion
 decreases in accessibility
 impact on the environment
 supporting growth in the region.

Question 3

Do you think we have correctly identified the most important transport challenges facing Auckland?

No. If No, what do you think should be included?

The phrase "decreases in accessibility" in our view does not sufficiently capture the problems blind and vision-impaired Aucklanders are facing when using public transport. There continue to be serious breaches in the accessible journey that include:

- Unsafe footpaths
- poor design causing problems for areas where pedestrians and cyclists must co-exist
- safety issues caused by favouring of roundabouts over traffic lights
- missing tactile ground surface indicators at road crossings
- problems with hailing the right bus and getting off at the right stop
- missing audio announcements on railway station platforms

We applaud your comment on page 26 of the draft RLTP which reads, “The quality of the pedestrian environment is the key barrier to increasing the number of walking trips, particularly the lack of safe, direct routes for walking”. We also note positive proposals on pages 37-38. We have drawn your attention to a number of issues, Onehunga Mall being just one, and we want to see more rapid fixes.

On page 34 you explain that “Buses are, and will remain, the most heavily used mode of public transport, currently accounting for around 70 per cent of public transport trips”. So we expect our ability to hail and get on the right bus and get off at the right stop will be sorted out within a reasonable timeframe.

Question 4

To help us understand whether we have the allocation of funding right, please indicate how important the following areas are to you:
Very important, moderately important, less important

Safety: high-risk road upgrades; speed management; monitoring of high-risk areas.
Very important

Public transport: extending the rapid transit network; bus priority lanes; new electric trains.
Very important

Walking and cycling: cycleways to make cycling safer; new footpaths and widening existing footpaths; promoting walking and cycling.
Very important

Supporting growth areas: funding for transport infrastructure in high-priority greenfield areas.
Very important.

Environment: making street lighting more energy efficient; encouraging use of electric vehicles; reducing pollution from road discharge into stormwater drains.
Very important

Network optimisation: dynamic traffic lanes; synchronising traffic signals; optimising road layout.
Very important

Corridor improvements: new local roads; upgrades to existing roads; upgrades to State Highways.
Very important

Question 5

Are there any projects or activities you think should be included?

Yes.

If Yes, what are these?

Please add specific reference to replacing the integrated ticketing system with one that is fully accessible to all users throughout the country at the outset of implementation. The 30 January 2018 new text/email service re AT HOP card transactions is truly appreciated. However there are many aspects of the AT HOP card that are not sufficiently accessible and the workarounds don't adequately fix the problems.

Similarly please add to references to technology to be used by AT's customers that all such technology be fully accessible to all users. On Page 8 under Focus Areas we read, "Maximise the benefits from transport technology". The AT Mobile app released in April 2017 was initially unusable for blind people. Although improvements have been made, problems persist.

Under Environment we read: ...encouraging use of electric vehicles. We understand and accept this as a principle. We must point out, however, that electric vehicles, in particular buses, trucks and cars, are quiet compared with noisy diesel engine vehicles. Electric trains are made more audible by railway station enclosures. Those of us who have heard the new double decker electric buses have not recognised them as buses at all, making it essential that AT sorts out difficulties for blind people to hail and get on the right buses and get off at the right stops. In general electric vehicles when travelling slowly or stopped are a safety hazard for blind people. We urge AT to factor this in to their pedestrian safety programme and take all necessary steps to assist blind pedestrians to navigate our streets safely.

Any other comments:

This draft RLTP is totally different from the version we submitted on in November 2012. It's pitched at very high level. Measurable outcomes against which we as blind people might hold Auckland Transport accountable seem not to be there. Words like impairment, blind, disability, disabilities, disabled, total mobility are not to be found. Blind and vision-impaired people do fall into groups like the vulnerable, but we are not explicitly mentioned.

In previous submissions we have expressed support for the Auckland Transport Disability Policy adopted in May 2013. The problems we have with Auckland Transport relate to AT not implementing its own disability policy.

If ever we needed a Disability Action Plan from Auckland Transport we need one now because the RLTP is so very high level. We note that AT is now working on its own Disability Action Plan.

Blind and vision-impaired people cannot drive cars. We pay rates and taxes too. We depend on public transport to get us around Auckland: from our homes to education, employment, and inclusion in the community.

We urge Auckland Transport to ensure it complies with the New Zealand Disability Strategy 2016-2026 and with the Human Rights Act 1993 by providing a non-discriminatory public service to all Aucklanders.

[The privacy policy statement on this feedback form has been omitted.]

Submission – Auckland Council Regional Fuel Tax Proposal

From: Cooper and Company NZ, for the Britomart Group of Companies

Address for Service: Level 3, 130 Quay Street, Britomart, Auckland 1010

Date: 14 May 2018

Subject: Regional Fuel Tax and City Centre Bus Infrastructure

1. Issue

This submission addresses the proposal for a Regional Fuel Tax (RFT) for Auckland, the allocation of RFT funds for City Centre Bus Infrastructure, and how this relates to:

- the Draft Long-Term Plan 2018-28
- the implementation of the City Centre Master Plan
- the planning, funding and development of the proposed Britomart East Bus Interchange.

2. The Proposed Regional Fuel Tax

Auckland faces ongoing and significant transport challenges and historic levels of investment in transport have been inadequate. Substantial investment in new transport facilities and services is required if Auckland is to keep pace with rapid growth and build a city that is both functional and a great place to live, work and play. We support the introduction of the proposed Regional Fuel Tax in so far as it will help to support the level of transport investment that is needed.

However, our support for the RFT is limited because of our concerns in relation to the proposed development of City Centre Bus Infrastructure. We have expressed our concerns in a submission on the Draft Long-Term Plan and a separate submission on the Regional Land Transport Plan (RLTP). Because those documents are closely related and interdependent with the proposed RFT, we have expressed those concerns here too.

3. Summary of Decisions Sought

What we are seeking is set out in full in section 6 of this submission. In summary, this submission seeks:

- Recognition of the particular public-private collaboration that has resulted in the protection of Britomart's heritage buildings and the special character and nature of the area.
- A collaborative approach to the planning, development and operation of the Britomart East Bus Interchange.
- The full funding of necessary amenities associated with the Britomart East Bus Interchange.

- A commitment to make part of the area currently controlled by Ports of Auckland (to the north of the 'red fence') available to ensure that the Britomart East Bus Interchange can:
 - operate safely,
 - be developed in a way that is sensitive to heritage values of the Britomart precinct, and avoids unnecessary visual and physical separation between the city and the harbour.
- A commitment to the operation of the bus interchange and roads and the management of traffic within and around the Britomart precinct to reflect the particular mix of uses, public spaces, heritage values and sense of community that is central to the long-standing shared vision for the area.

4. Who We Are and What We Represent

Lying between the Waitemata Harbour and Auckland's lower CBD, Britomart is a 6.5-hectare waterfront precinct of heritage buildings, new developments and open and intimate public spaces. It is immediately adjacent to Auckland's main transport hub, Britomart Transport Centre.

The area has a rich history as Auckland's first mercantile centre and is home to one of the largest concentrations of heritage buildings in the city. After a long period of neglect in the 1980s and 90s, Britomart has been given a new lease of life by its long-term owners, the Britomart group of companies.

The Britomart project is founded on a public-private collaboration between the Britomart Group of companies and Auckland Council. Britomart Group holds a contract for the long-term ownership and development of the Britomart Precinct. Cooper and Company NZ is the asset and development manager of the Britomart group of companies.

The re-development of Britomart through a public-private collaboration was made possible by the public tendering of the Britomart development contract by Auckland City Council in 2002. Following the awarding of the contract in 2004 there has been substantial private sector investment in the precinct.

Today Britomart is a busy and diverse mix of restaurants, bars, boutiques, offices and services, with over 200 businesses now operating in the precinct. It is an important part of Auckland that has a unique heritage of history, culture and architecture. Once neglected, it has emerged as a vibrant and growing mixed-use community.

The unique and important status of Britomart is reflected in the formal heritage protection of the historic Quay and Customs Street East areas championed by Heritage New Zealand.

Britomart's streetscape is made up of graceful heritage buildings and bold contemporary structures, linked by an inviting network of public spaces.

Much of Britomart's unique character comes from the contrasts and relationships between its buildings: historic and modern, bold and intimate, public and private. Connecting and separating the buildings is a pattern of linked public spaces, where people can gather, meet and linger. This emphasis on people and places that make them feel comfortable is at the heart of the vision for Britomart. Designed on an accessible, human scale, the buildings and spaces of Britomart come together to create a busy, welcoming 'people place' in the central city.

The Britomart Group's vision for Britomart is a place that celebrates New Zealand and brings together the best of many cultures. It is diverse, urban, energetic and welcoming day and night. It is street-based and pedestrian-focused and combines heritage and cutting-edge elements in interesting and unexpected ways. Britomart's growth is being carefully planned and managed to ensure it respects its heritage, maintains the right mix of elements and integrates gracefully into its environment. The Britomart Group is committed to the long-term ownership and management of Britomart. This will ensure that as the Britomart community evolves, its special character is retained and preserved as a legacy for future generations.

5. Some History

Over recent years Auckland Council and Auckland Transport have made a number of decisions relating to development of the city centre and the location of public transport services. Key decisions have included:

- the construction of CRL
- the sale of Queen Elizabeth Square and the relocation of bus services from Lower Queen Street outside of the old Post Office building
- the Victoria Street linear park
- the development of the Wellesley Street Bus Boulevard
- the Grafton Gully University Station
- the use of Lower Albert Street for northern and north-western bus services
- the decision to reduce through traffic along Quay Street in order to improve pedestrian accessibility and connections to the harbour and the consequential increase in through traffic movements on Customs Street (limiting its ability to also accommodate bus services)
- support for the development of LRT through Queen Street with the consequential planned removal of a proportion of vehicle traffic
- the adoption and part funding of the City Centre Master Plan
- the adoption and part funding of the Waterfront Strategy.

These decisions appear to have been made as a series of one-off decisions, where it seems inadequate consideration was given to the cumulative and knock-on effects of each individual decision. The result is that the only potentially workable CBD location for a significant number of eastern bus services is Quay Street, alongside the Britomart Precinct. This is referred to in the Draft LTP as the Britomart East Bus Interchange.

For a range of reasons Quay Street is a far from an ideal location for a major bus interchange:

- The potential walking catchment for passengers for this location is severely constrained because half of the potential walking catchment area is in the harbour.
- The operation of Quay Street as a bus interchange will require the introduction of a significant turning circle that will allow buses to enter the CBD travelling west along Quay Street and then turn around to exit the CBD travelling east.
- The Quay Street cycle way is a key part of the regional cycle network and it must be accommodated right through the area that is proposed to become a bus interchange.

Private car and heavy vehicle traffic must continue to be provided for to ensure access to the buildings along Quay Street, as well as access to the ferry terminal.

- The available width of Quay Street is constrained by the 'red fence' and the customs bonded area controlled by Ports of Auckland.
- The number of potential bus movements will significantly impact on the amenity of the area.
- Insensitive development of bus stops, shelters and other passenger services could negatively impact on the significant heritage values of the Britomart Precinct (which we and previous Councils have worked hard to preserve).
- The number and nature of potential bus movements along Quay Street have the potential to create a new barrier between the CBD and the waterfront – contrary to the important objective of improving access and connectivity to the harbour.

While we remain of the view that Quay Street is not a sensible place to develop a substantial bus interchange, we accept that, as a consequence of a whole sequence of other decisions that have been made, there are few alternatives left.

We have raised our concerns with Auckland Transport. We are very grateful that they have recognised the short-comings of earlier planning and have undertaken to review their plans in an effort to develop a more workable approach to the use of Quay Street as a bus interchange. One of their key challenges is how to manage interactions between the Quay Street cycle lane, buses and passengers using the bus interchange.

We understand that Auckland Transport are currently reviewing concepts for the future of Quay Street from Queen Street to Tamaki Drive, including the cycleway, the proposed bus interchange, the width of the road, turning for buses, and the Strand and Solent Street intersections. Auckland Transport have assured us that as part of this work they are exploring the use of space to the north of the current 'red fence'.

We are strongly of the view that unless more space is available to the north of the 'red fence' the development of the Britomart East Bus Interchange will significantly compromise Quay Street, access to the waterfront, the heritage values of the Britomart precinct and any future public use of wharves which are currently used by Ports of Auckland, but which are likely to be released for public use in the future.

6. Draft Regional Fuel Tax Funding and Long-Term Plan Funding

The RFT proposal allocates \$62m of RFT revenues towards a total project cost of \$163m for the development of City Centre Bus Infrastructure. From the text of the proposal it appears that this is funding for a bus interchange in Lower Albert Street, Wellesley Street bus improvements and a Quay Street east bus interchange. These initiatives are reflected in the Draft Long-Term Plan and in the RLTP.

The Draft Long-Term Plan 2018-28 provides three differing options for the delivery of the City Centre Masterplan:

- the Funded Base Case (\$372m over the next three years),
- Scenario 1: Progressing the Vision (\$922m – Base + \$550m), and
- Scenario 2: Delivering for the Future (\$1164m – Scenario 1 + \$242m).

We understand from the Long-Term Plan consultation material that the Funded Base Case includes:

- Britomart East Bus Interchange
- Britomart Precinct Streetscapes
- Quay Street Sea Wall.

Based on the information contained in the draft LTP and supporting documents, it is not possible to determine the extent of the funded works. As far as we can tell, they do not include interchange amenities. The line item “Britomart East Bus Interchange Amenity” is included in Scenario 1, which is unfunded. This suggests that the starting point for the proposed Britomart East Bus Interchange is likely to be a rather stark and bare bones addition to the prime waterfront area of our city, and that necessary amenities are unfunded.

The Public Transport Major Programmes and Projects section of the draft LTP identifies CBD Bus Infrastructure Improvements, which are described as: “*Delivery of bus infrastructure in the CBD, including bus priority along Wellesley Street, a new Learning Quarter bus interchange, a new Wynyard bus interchange, a new Downtown bus interchange*”. The budget for this is \$153m and it is scheduled for the first decade of the plan (between 2019 and 2028). This is similar to the \$163m provided for City Centre Bus Infrastructure in the RFT proposal, and the total of \$163m provided for city centre bus improvements in the RLTP.

While it is difficult to judge the scope of the proposed works in relation to the Britomart East Bus Interchange, it is clear from the RLTP that the bulk of the funding for City Centre Bus Improvements is allocated to Wellesley Street and a new Learning Quarter interchange. As is shown in the table below, the RLTP proposes that \$39m of the total \$163m for City Centre Bus Improvements relates to both the Lower Albert Street and Quay Street facilities. As we concluded from the Draft LTP, this suggests that the starting point for the proposed Britomart East Bus Interchange is likely to be a rather stark and bare bones addition to the prime waterfront area of our city, and that necessary amenities are unfunded.

Project Name	Description	Indicative Project Cost
Downtown Bus Improvements	Delivery of new bus interchanges on Quay Street East and Lower Albert Street, in conjunction with CRL and Council Downtown Projects	\$39m
Albert and Vincent Street Bus Priority Improvements	Bus priority measures on Albert and Vincent Street to improve journey time and reliability between Karangahape Road and Britomart	\$7m
City Centre Bus Improvements	Delivery of bus infrastructure in the CBD, including bus priority along Wellesley Street, and a new Learning Quarter bus interchange	\$117m
Total		\$163m

7. What we are seeking

In essence, we are asking the Council to ensure that it recognises and gives effect to the values and aspirations that underpin the Britomart Development Agreement in all of its decisions relating to the area. Today's Britomart is the result of a very particular public-private collaboration. That collaboration has resulted in the protection of Britomart's heritage buildings and the special character and nature of the area. That same collaboration is central to ensuring that the heritage of the area is protected for the future.

We therefore seek a commitment from Auckland Council to a collaborative approach to the planning, development and operation of the Britomart East Bus Interchange.

We seek a commitment from Auckland Council to make part of the area currently controlled by Ports of Auckland (to the north of the 'red fence') available to ensure that the Britomart East Bus Interchange can:

- operate safely, and
- be developed in a way that is sensitive to heritage values of the Britomart precinct, and avoids unnecessary visual and physical separation between the city and the harbour.

We seek a commitment from Auckland Council that the future development, operation and use of the Britomart East Bus Interchange and the roads and footpaths in and around the Britomart Precinct, respects and protects the particular mix of uses, public spaces, heritage values and sense of community that is central to the long-standing shared vision for the area, including the important goal of providing better connections between the city and the sea. This commitment needs to be reflected in the design and construction of the interchange, pavements, shelters, way finding and signage, passenger information, toilet facilities, and in the operation and lay out of the bus interchange. To this end we request the Council to ensure that:

- a. there is no bus layover within the interchange or on Quay Street to the west of Britomart Place
- b. the bus stops are spaced so that they (and the buses that use them) do not create a visual or physical barrier between the city and the sea
- c. the bus stops on either side of Quay Street are off-set so that they (and the buses that use them) do not create a visual or physical barrier between the city and the sea
- d. the allocation of bus routes to bus stops ensures that the resulting density and timing of bus movements does not create a visual or physical barrier between the city and the sea
- e. the operation of the bus interchange is actively managed to ensure that bus operators comply with the operational requirements
- f. Gore Street remains open for traffic in order to provide access to the buildings and the precinct
- g. Britomart Place is kept open for traffic, but is not overloaded – it is a local access road, not a major thoroughfare and given the high number of pedestrian movements, and turning movements associated with local access, there should be no buses in Britomart Place

- h. no buses operate within the rest of the Britomart precinct – if the bus interchange is to be located on Quay Street, the rest of the precinct needs to be given over to pedestrians and local traffic
- i. bus shelters are designed to match and reinforce the heritage values and nature of the buildings on Quay Street, and in particular do not interfere with the frontage of the heritage buildings (physical distance between bus shelters and the buildings will be important to achieve this objective)
- j. footpaths along Quay Street through the bus interchange are to be wide enough to safely accommodate passenger movements and enable to businesses located on Quay Street to operate effectively and with the same amenity as they currently enjoy.

We also note that the operation of Customs Street is critical to the success of the Britomart Precinct, the functioning of the CBD, and to the objectives of the City Centre Masterplan. With the significant changes to the CBD transport network that are planned, Customs Street becomes one of the few east-west connections for vehicles across the CBD. This presents a very real challenge to balance the need for effective east-west traffic movements while ensuring that Customs Street (and the density of traffic movements on it) do not create a barrier between the city and Britomart – effectively between the city and the sea.

We ask the Council to fully fund the amenities that will be necessary to support the effective operation of the Britomart East Interchange and ensure that passenger amenities, including sufficient, clean public toilets, waste disposal and passenger information are provided from the very beginning.

We are committed to working with the Council and its CCOs to achieve the outcomes that we are seeking. We request that the Council commit to a design process that fully involves our heritage and urban design experts and our traffic engineers and transport planners. We see this as critical to ensuring that we all make the best of the situation that we are now in.



Matthew Cockram
Principal
Chief Executive Officer
New Zealand

COOPER AND COMPANY
Level 2, 130 Quay Street, Britomart
PO Box 1150, Auckland 1140, New Zealand.

Submission – Auckland Transport Draft Regional Land Transport Plan 2018-2028

From: Cooper and Company NZ, for the Britomart Group of Companies

Address for Service: Level 3, 130 Quay Street, Britomart, Auckland 1010

Date: 14 May 2018

Subject: **Regional Land Transport Plan 2018-2028**

1. Issue

This submission addresses the draft Regional Land Transport Plan 2018-28 (RLTP) for Auckland and how this relates to:

- the proposed allocation of Regional Fuel Tax (RFT) funds for City Centre Bus Infrastructure
- the Draft Long-Term Plan 2018-28
- the implementation of the City Centre Master Plan
- the planning, funding and development of the proposed Britomart East Bus Interchange.

2. The Draft Regional Land Transport Plan 2018-28

The draft RLTP sets out the programme of activities and planned infrastructure and services considered necessary to support the growth of Auckland over the next decade. Auckland faces ongoing and significant transport challenges and historic levels of investment in transport have been inadequate. Substantial investment in new transport facilities and services is required if Auckland is to keep pace with rapid growth, and build a city that is both functional, and a great place to live, work and play.

One of the key features of the draft RLTP is the emphasis on public transport and the significant improvement in public transport services and infrastructure. Whilst we welcome this shift in emphasis and investment, we have significant concerns in relation to the proposed development of City Centre Bus Infrastructure. We have expressed our concerns in a submission on the Draft Long-Term Plan and a separate submission on the proposed Regional Fuel Tax (RFT). Because those documents are closely related and interdependent with the draft RLTP, we have expressed those concerns here too.

3. Summary of Decisions Sought

What we are seeking is set out in full in section 6 of this submission. In summary, this submission seeks:

- Recognition of the particular public-private collaboration that has resulted in the protection of Britomart's heritage buildings and the special character and nature of the area.
- A collaborative approach to the planning, development and operation of the Britomart East Bus Interchange.
- The full funding of necessary amenities associated with the Britomart East Bus Interchange.
- A commitment to make part of the area currently controlled by Ports of Auckland (to the north of the 'red fence') available to ensure that the Britomart East Bus Interchange can:
 - operate safely,
 - be developed in a way that is sensitive to heritage values of the Britomart precinct, and avoids unnecessary visual and physical separation between the city and the harbour.
- A commitment to the operation of the bus interchange and roads and the management of traffic within and around the Britomart precinct to reflect the particular mix of uses, public spaces, heritage values and sense of community that is central to the long-standing shared vision for the area.

4. Who We Are and What We Represent

Lying between the Waitemata Harbour and Auckland's lower CBD, Britomart is a 6.5-hectare waterfront precinct of heritage buildings, new developments and open and intimate public spaces. It is immediately adjacent to Auckland's main transport hub, Britomart Transport Centre.

The area has a rich history as Auckland's first mercantile centre and is home to one of the largest concentrations of heritage buildings in the city. After a long period of neglect in the 1980s and 90s, Britomart has been given a new lease of life by its long-term owners, the Britomart group of companies.

The Britomart project is founded on a public-private collaboration between the Britomart Group of companies and Auckland Council. Britomart Group holds a contract for the long-term ownership and development of the Britomart Precinct. Cooper and Company NZ is the asset and development manager of the Britomart group of companies.

The re-development of Britomart through a public-private collaboration was made possible by the public tendering of the Britomart development contract by Auckland City Council in 2002. Following the awarding of the contract in 2004 there has been substantial private sector investment in the precinct.

Today Britomart is a busy and diverse mix of restaurants, bars, boutiques, offices and services, with over 200 businesses now operating in the precinct. It is an important part of Auckland that has a unique heritage of history, culture and architecture. Once neglected, it has emerged as a vibrant and growing mixed-use community.

The unique and important status of Britomart is reflected in the formal heritage protection of the historic Quay and Customs Street East areas championed by Heritage New Zealand.

Britomart's streetscape is made up of graceful heritage buildings and bold contemporary structures, linked by an inviting network of public spaces.

Much of Britomart's unique character comes from the contrasts and relationships between its buildings: historic and modern, bold and intimate, public and private. Connecting and separating the buildings is a pattern of linked public spaces, where people can gather, meet and linger. This emphasis on people and places that make them feel comfortable is at the heart of the vision for Britomart. Designed on an accessible, human scale, the buildings and spaces of Britomart come together to create a busy, welcoming 'people place' in the central city.

The Britomart Group's vision for Britomart is a place that celebrates New Zealand and brings together the best of many cultures. It is diverse, urban, energetic and welcoming day and night. It is street-based and pedestrian-focused and combines heritage and cutting-edge elements in interesting and unexpected ways. Britomart's growth is being carefully planned and managed to ensure it respects its heritage, maintains the right mix of elements and integrates gracefully into its environment. The Britomart Group is committed to the long-term ownership and management of Britomart. This will ensure that as the Britomart community evolves, its special character is retained and preserved as a legacy for future generations.

5. Some History

Over recent years Auckland Council and Auckland Transport have made a number of decisions relating to development of the city centre and the location of public transport services. Key decisions have included:

- the construction of CRL
- the sale of Queen Elizabeth Square and the relocation of bus services from Lower Queen Street outside of the old Post Office building
- the Victoria Street linear park
- the development of the Wellesley Street Bus Boulevard
- the Grafton Gully University Station
- the use of Lower Albert Street for northern and north-western bus services
- the decision to reduce through traffic along Quay Street in order to improve pedestrian accessibility and connections to the harbour and the consequential increase in through traffic movements on Customs Street (limiting its ability to also accommodate bus services)
- support for the development of LRT through Queen Street with the consequential planned removal of a proportion of vehicle traffic
- the adoption and part funding of the City Centre Master Plan
- the adoption and part funding of the Waterfront Strategy.

These decisions appear to have been made as a series of one-off decisions, where it seems inadequate consideration was given to the cumulative and knock-on effects of each individual decision. The result is that the only potentially workable CBD location for a significant number of eastern bus services is Quay Street, alongside the Britomart Precinct. This is referred to in the Draft LTP as the Britomart East Bus Interchange.

For a range of reasons Quay Street is a far from an ideal location for a major bus interchange:

- The potential walking catchment for passengers for this location is severely constrained because half of the potential walking catchment area is in the harbour.
- The operation of Quay Street as a bus interchange will require the introduction of a significant turning circle that will allow buses to enter the CBD travelling west along Quay Street and then turn around to exit the CBD travelling east.
- The Quay Street cycle way is a key part of the regional cycle network and it must be accommodated right through the area that is proposed to become a bus interchange. Private car and heavy vehicle traffic must continue to be provided for to ensure access to the buildings along Quay Street, as well as access to the ferry terminal.
- The available width of Quay Street is constrained by the 'red fence' and the customs bonded area controlled by Ports of Auckland.
- The number of potential bus movements will significantly impact on the amenity of the area.
- Insensitive development of bus stops, shelters and other passenger services could negatively impact on the significant heritage values of the Britomart Precinct (which we and previous Councils have worked hard to preserve).
- The number and nature of potential bus movements along Quay Street have the potential to create a new barrier between the CBD and the waterfront – contrary to the important objective of improving access and connectivity to the harbour.

While we remain of the view that Quay Street is not a sensible place to develop a substantial bus interchange, we accept that, as a consequence of a whole sequence of other decisions that have been made, there are few alternatives left.

We have raised our concerns with Auckland Transport. We are very grateful that they have recognised the short-comings of earlier planning and have undertaken to review their plans in an effort to develop a more workable approach to the use of Quay Street as a bus interchange. One of their key challenges is how to manage interactions between the Quay Street cycle lane, buses and passengers using the bus interchange.

We understand that Auckland Transport are currently reviewing concepts for the future of Quay Street from Queen Street to Tamaki Drive, including the cycleway, the proposed bus interchange, the width of the road, turning for buses, and the Strand and Solent Street intersections. Auckland Transport have assured us that as part of this work they are exploring the use of space to the north of the current 'red fence'.

We are strongly of the view that unless more space is available to the north of the 'red fence' the development of the Britomart East Bus Interchange will significantly compromise Quay Street, access to the waterfront, the heritage values of the Britomart precinct and any future public use of wharves which are currently used by Ports of Auckland, but which are likely to be released for public use in the future.

6. Draft Regional Land Transport Plan and Long-Term Plan Funding

The Draft Long-Term Plan 2018-28 provides three differing options for the delivery of the City Centre Masterplan:

- the Funded Base Case (\$372m over the next three years),
- Scenario 1: Progressing the Vision (\$922m – Base + \$550m), and
- Scenario 2: Delivering for the Future (\$1164m – Scenario 1 + \$242m).

We understand from the Long-Term Plan consultation material that the Funded Base Case includes:

- Britomart East Bus Interchange
- Britomart Precinct Streetscapes
- Quay Street Sea Wall.

Based on the information contained in the draft LTP and supporting documents, it is not possible to determine the extent of the funded works. As far as we can tell they do not include interchange amenities. The line item “Britomart East Bus Interchange Amenity” is included in Scenario 1, which is unfunded. This suggests that the starting point for the proposed Britomart East Bus Interchange is likely to be a rather stark and bare bones addition to the prime waterfront area of our city, and that necessary amenities are unfunded.

The Public Transport Major Programmes and Projects section of the draft LTP identifies CBD Bus Infrastructure Improvements, which are described as: “*Delivery of bus infrastructure in the CBD, including bus priority along Wellesley Street, a new Learning Quarter bus interchange, a new Wynyard bus interchange, a new Downtown bus interchange*”. The budget for this is \$153m and it is scheduled for the first decade of the plan (between 2019 and 2028). This is similar to the \$163m provided for City Centre Bus Infrastructure in the RFT proposal, and the total of \$163m provided for city centre bus improvements in the RLTP.

The RFT proposal allocates \$62m of RFT revenues towards a total project cost of \$163m for the development of City Centre Bus Infrastructure. From the text of the proposal it appears that this is funding for a bus interchange in Lower Albert Street, Wellesley Street bus improvements and a Quay Street east bus interchange. These initiatives are reflected in the Draft Long-Term Plan and in the RLTP.

While it is difficult to judge the scope of the proposed works in relation to the Britomart East Bus Interchange, it is clear from the draft RLTP that the bulk of the funding for City Centre Bus Improvements is allocated to Wellesley Street and a new Learning Quarter interchange. As is shown in the table below, the RLTP proposes that \$39m of the total \$163m for City Centre Bus Improvements relates to both the Lower Albert Street and Quay Street facilities. As we concluded from the Draft LTP, this suggests that the starting point for the proposed Britomart East Bus Interchange is likely to be a rather stark and bare bones addition to the prime waterfront area of our city, and that necessary amenities are unfunded.

Project Name	Description	Indicative Project Cost
Downtown Bus Improvements	Delivery of new bus interchanges on Quay Street East and Lower Albert Street, in conjunction with CRL and Council Downtown Projects	\$39m
Albert and Vincent Street Bus Priority Improvements	Bus priority measures on Albert and Vincent Street to improve journey time and reliability between Karangahape Road and Britomart	\$7m
City Centre Bus Improvements	Delivery of bus infrastructure in the CBD, including bus priority along Wellesley Street, a new Learning Quarter bus interchange	\$117m
Total		\$163m

7. What we are seeking

In essence, we are asking Auckland Transport and Auckland Council to ensure that they recognise and give effect to the values and aspirations that underpin the Britomart Development Agreement in all of their decisions relating to the area. Today's Britomart is the result of a very particular public-private collaboration. That collaboration has resulted in the protection of Britomart's heritage buildings and the special character and nature of the area. That same collaboration is central to ensuring that the heritage of the area is protected for the future.

We therefore seek a commitment from Auckland Transport and Auckland Council to a collaborative approach to the planning, development and operation of the Britomart East Bus Interchange.

We seek a commitment from Auckland Transport and Auckland Council to make part of the area currently controlled by Ports of Auckland (to the north of the 'red fence') available to ensure that the Britomart East Bus Interchange can:

- operate safely, and
- be developed in a way that is sensitive to heritage values of the Britomart precinct, and avoids unnecessary visual and physical separation between the city and the harbour.

We seek a commitment from Auckland Transport and Auckland Council that the future development, operation and use of the Britomart East Bus Interchange and the roads and footpaths in and around the Britomart Precinct, respects and protects the particular mix of uses, public spaces, heritage values and sense of community that is central to the long-standing shared vision for the area, including the important goal of providing better connections between the city and the sea. This commitment needs to be reflected in the design and construction of the interchange, pavements, shelters, way finding and signage, passenger information, toilet facilities, and in the operation and lay out of the bus interchange. To this end we request the Auckland Transport and Auckland Council to ensure that:

- a. there is no bus layover within the interchange or on Quay Street to the west of Britomart Place
- b. the bus stops are spaced so that they (and the buses that use them) do not create a visual or physical barrier between the city and the sea
- c. the bus stops on either side of Quay Street are off-set so that that they (and the buses that use them) do not create a visual or physical barrier between the city and the sea
- d. the allocation of bus routes to bus stops ensures that the resulting density and timing of bus movements does not create a visual or physical barrier between the city and the sea
- e. the operation of the bus interchange is actively managed to ensure that bus operators comply with the operational requirements
- f. Gore Street remains open for traffic in order to provide access to the buildings and the precinct
- g. Britomart Place is kept open for traffic, but is not overloaded – it is a local access road, not a major thoroughfare and given the high number of pedestrian movements, and turning movements associated with local access, there should be no buses in Britomart Place
- h. no buses operate within the rest of the Britomart precinct – if the bus interchange is to be located on Quay Street, the rest of the precinct needs to be given over to pedestrians and local traffic
- i. bus shelters are designed to match and reinforce the heritage values and nature of the buildings on Quay Street, and in particular do not interfere with the frontage of the heritage buildings (physical distance between bus shelters and the buildings will be important to achieve this objective)
- j. footpaths along Quay Street through the bus interchange are be wide enough to safely accommodate passenger movements and enable to businesses located on Quay Street to operate effectively and with the same amenity as they currently enjoy.

We also note that the operation of Customs Street is critical to the success of the Britomart Precinct, the functioning of the CBD, and to the objectives of the City Centre Masterplan. With the significant changes to the CBD transport network that are planned, Customs Street becomes one of the few east-west connections for vehicles across the CBD. This presents a very real challenge to balance the need for effective east-west traffic movements while ensuring that Customs Street (and the density of traffic movements on it) do not create a barrier between the city and Britomart – effectively between the city and the sea.

We ask Auckland Transport and Auckland Council to fully fund the amenities that will be necessary to support the effective operation of the Britomart East Interchange and ensure that passenger amenities, including sufficient, clean public toilets, waste disposal and passenger information are provided from the very beginning.

We are committed to working with the Auckland Transport and Auckland Council and its other CCOs to achieve the outcomes that we are seeking. We request that the Auckland Transport and Auckland Council commit to a design process that fully involves our heritage and urban design experts and our traffic engineers and transport planners. We see this as critical to ensuring that we all make the best of the situation that we are now in.

A handwritten signature in black ink, appearing to read 'Matthew Cockram', with a long horizontal flourish extending to the right.

Matthew Cockram
Principal
Chief Executive Officer
New Zealand

COOPER AND COMPANY
Level 2, 130 Quay Street, Britomart
PO Box 1150, Auckland 1140, New Zealand.

Submission on Auckland Regional Land Transport Plan

This submission is made by the Committee of the Buckleton Beach Residents' Association (BBRA) on behalf of the 93 property owners at Buckleton Beach. The Committee is empowered to make submissions on behalf of the residents on matters of importance to their enjoyment of the neighbourhood and surrounds.

Access to Buckleton Beach is via Whitmore Road which has a 2 km long unsealed section in the middle. We believe this section of road is an ongoing hazard to the safety of road users, whether vehicle drivers, pedestrians, horse riders or cyclists. Whitmore Road has a number of key features which support it being completely sealed:

- Increased heavy traffic due to residential construction along the road
- More frequent use by day visitors, unfamiliar with unsealed surfaces
- Frequent use of the road by cyclists, horse riders and walkers
- A relatively simple alignment which would be readily sealed

Our Committee is aware of a number of so far unreported incidents involving vehicles losing control and near misses on the unsealed section. These include vehicles leaving the road. Ongoing development is causing increased traffic as noted earlier. This in turn has increased the health risk caused by dust to residents living close to the road. The road is also a school bus route.

The 2018 Government Policy Statement on Transport has improving road safety as one of its four key outcomes. Improving the safety of Whitmore Road for road users by sealing the unsealed 2km section would be very much in line with the GPS outcomes.

We note the current Plan has a committed \$36m allocation for the ten year seal extension programme. There is also an unfunded additional \$85m in the Corridor Improvements Programme for seal extension across Auckland. We believe that all suitable sources of funding (including the proposed Regional Fuel Tax) should be utilised to advance the seal extension programme.

Our submission has two key requests:

1. That Auckland Transport commits to funding the enhanced programme of seal extension (\$85 m over ten years)
2. That Whitmore Road be sealed either under the current committed funds or as part of the enhanced programme

Should there be no additional funding, we would urge Auckland Transport to explore other maintenance seal methods to improve the current condition of the unsealed portion of the road.

Contact Details:

Brent Meekan, Mob 021 646888, brentandsue@xtra.co.nz

Andrew Stone, Mob 027 2945327, andrew@twoviews.co.nz

Peter Clarke (Chair BBRA), Mob 021 840077, peterclarke888@gmail.com

14 May 2018

Auckland Council
akhaveyoursay@aucklandcouncil.govt.nz

SUBMISSION ON THE PROPOSED REGIONAL FUEL TAX FOR AUCKLAND

Introduction

The Bus and Coach Association is not opposed to the introduction of a regional fuel tax. However, it is critical that the negative impacts of the proposed tax be minimised for bus and coach operators.

We recognise that major infrastructure improvements are required in Auckland, and a regional fuel tax would help Auckland Council meet their share of the costs. However, the prospect of a regional fuel tax in Auckland raises issues for urban and school bus operators, as well as coach operators. The expected impact on these sectors, and some recommendations to limit the impact, are outlined below.

In addition, we are concerned that electric vehicles are permanently exempt from the regional fuel tax.

Impact on coach operators

Coach operators based in Auckland or operating in Auckland would be negatively impacted – particularly if they have taken advance bookings with prices locked-in. Some operators may lock-in prices for several years in advance, so will have to absorb input cost increases.

Coach operators without advance bookings theoretically have the ability to pass on costs to their customers. However, when increasing fuel costs are added to expected increases in wage and accommodation costs, the impact will be felt throughout the tourism value chain. Coach operators may be under pressure to absorb some cost increases to maintain competitiveness in an international tourist market.

Impact on urban and school bus operators

Urban and school bus services are contracted by regional authorities and the Ministry of Education based on fixed price contracts. Operators are compensated for increases to input costs such as wages, fuel, and road user charges through the indexation of contract prices. The indexation of fuel costs is done on the basis of a national cost index.

The impact on fuel costs from the proposal fuel tax will be substantially higher in Auckland than it will be nationally. As a result, fuel cost indexation based on a national index is unlikely to properly compensate bus operators in Auckland.

Auckland has the largest urban bus network in the country, and all urban service contracts have now either been tendered or negotiated based on a benchmarked price. To ensure an Auckland regional fuel tax does not impact the sustainability of these contracts, we strongly advocate that a regional cost index be developed.

In the process of developing a regional cost index for Auckland we suggest a region-specific wage index be included as part of this. Urban operators in Auckland are being impacted by wage growth beyond what is being experienced nationally. A regional wage index would better compensate operators for these cost increases during the course of a service contract.

Indexation lagging and unrecovered costs

The draft Government Policy Statement on Land Transport has signalled a potential increase in fuel excise duty and equivalent road user charges of up to 12 cents per litre over the next three years. When combined with a regional fuel tax in Auckland, bus and coach operators are facing substantial cost increases.

Cost indexation for urban and school bus contracts typically lags the actual increased expenditure on inputs, and for urban operators in Auckland this lag can be up to 6 months. This means during periods of input cost escalation some of the increased cost operators experience will not be recovered.

Contracting agencies, including Auckland Transport, should be encouraged to reduce lagging in their indexation to reduce the negative impacts on contractors. It is critical that every effort is made to ensure urban and school bus operators are fairly compensated for increases in fuel costs and road user charges.

Exemption for electric vehicles

Auckland Council's proposal would see a tax of 10 cents per litre applied to petrol and diesel for a period of 10 years (or more if it is extended) to fund transport infrastructure. This means electric vehicle (EV) drivers, that by definition do not use diesel or petrol, are effectively exempt from paying for the infrastructure they benefit from.

At present EVs make up a relatively small proportion of the national vehicle fleet, however close to half of New Zealand's EVs are in Auckland. As the number of EVs

in Auckland grows, the revenue derived from the regional fuel tax will decrease, and the effective subsidy for EV drivers will increase.

While at present the exemption from the tax might be seen as a further incentive for the uptake of EVs, it may ultimately threaten the sustainability of the funding stream. Auckland Council should seek to ensure all road users are contributing to the cost of transport infrastructure.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Barry Kidd", with a horizontal line underneath.

Barry Kidd
Chief Executive



Submission

Draft Proposal for a Regional Fuel Tax

Draft Regional Land Transport Plan

Date of submission: 14 May 2018

Please note: We wish to make an oral presentation to this submission

Business North Harbour Incorporated

Peter Lamberton – Chairman and Janine Brinsdon – General Manager
PO Box 303 126
North Harbour
Auckland 0751
Phone 09 968 2222 or 021 212 4942

Email: gm@businessnh.org.nz

Local Board Representation: Upper Harbour Local Board

Signature:

A handwritten signature in blue ink, appearing to be "Peter Lamberton", written over a light blue horizontal line.

Individual member feedback is available upon request.

Introduction

Business North Harbour is a significant commercial/industrial Business Improvement District (BID), representing over 4,500 commercial property owners and businesses within the North Harbour area. Collectively they employ over 35,000 Auckland residents and ratepayers.

Our businesses comprise of a mix of sole traders, Small Medium Enterprises (SME), through to, multinational organisations representing sectors such as ICT, business services, specialist manufacturing and light – medium warehousing. In addition, we have key primary and tertiary educational institutions within or on our boundary which attract over 11,000 students. In addition to these institutions, Massey University is within two kilometres of our business district and attracts a further 6800 students.

Upper Harbour Local Board area is expected to be one of the fastest growing areas in the country over the next ten years, in both absolute and percentage population terms¹, which brings both challenges and opportunities to the North Harbour Business district.

Our primary interests are decisions within the Draft Proposal for a Regional Fuel Tax, and the Draft Auckland Regional Land Transport Plan 2018-2028 which:

- Impact on the cost of business – across a short to medium timeframe
- Impact on economic development and the ability to leverage value from location
- Support or restrict business growth opportunities
- Impact on access to both regional and localised transport hubs
- Impact on commercial and industrial property investment

The Draft Proposal for a Regional Fuel Tax (RFT), and the Draft Auckland Regional Land Transport Plan (draft RTLTP) 2018-2028, sets out local and central government's transport priorities, and how these are to be funded. You are seeking feedback across several key proposals. Our response is set out below and will focus on:

- (1) Proposed Regional Fuel Tax;
- (2) Proposed Regional Fuel Tax projects
- (3) Supported Projects and activities within the Draft RLTP
- (4) Excluded Projects and activities with the Draft RLTP

We invite readers of this document to refer to Business North Harbour's Auckland Council 10-year Budget 2018-28², and Business North Harbour's Draft Auckland Plan 2050³ and Draft Government Policy Statement on Land Transport (GPS) 2018⁴ submissions as these provide context and consistency of views expressed within this submission.

Alignment across the above plans, and the Auckland Transport Alignment Project (ATAP) recommendations is commented upon and outlined in the vision for the Draft Regional Land Transport Plan 2018-28⁵. We agree with the importance of this alignment if it results in 'growth without increased congestion, where it is easy to access employment and services...'

¹ Auckland Council 10-year Budget 2018-28, Supporting Information, Section 6: Local Board Information, 6.17 UHLB

² http://businessnh.org.nz/media/files/Advocacy/DLTP%20Submission%2028%20March%202018_v1%20Final.pdf

³ http://businessnh.org.nz/media/files/Advocacy/DLTP%20Submission%2028%20March%202018_v1%20Final.pdf

⁴ <http://businessnh.org.nz/media/files/Advocacy/Business%20North%20Harbour%20Inc%20Submission%20GPS2018%20FINAL.pdf>

⁵ Draft Auckland Regional Land Transport Plan 2018-2028, page 3, section 01. Our Vision

However, we note with concern the change of priorities within the GPS 2018, from those previously expressed in GPS 2015/16⁶ which had as **priority one: supporting economic growth and productivity**. As quoted from GPS 2015/25; In advancing these priorities and improving the provision of infrastructure and services, the Government expects to achieve the following impacts:

- Improved journey time reliability;
- Easing of severe congestion;
- More efficient freight supply chains;
- Better use of existing transport capacity;
- Better access to markets, employment and areas that contribute to economic growth;
- Greater transport choice, particularly for those with limited car access;
- A secure and resilient transport network.

Business North Harbour was hopeful that due to the timing of release of these key local and central government strategic documents, that the needs of business would be recognised. There are elements which address the need to increase access, improve productivity, create employment options and opportunities, but there are significant questions remaining which we will address through this submission.

⁶ Government Policy Statement on Land Transport Funding 2015/16 – 2024/25, section 3.1.7

(1) Proposed Regional Fuel Tax context

As reported in our Draft Auckland Council 10-year Budget 2018-28 submission, improvements to transport infrastructure is one of – if not, **the** key issue for our 4,500 North Harbour business and commercial property owners, and their 35,000 employees. The ability to move efficiently within the North Shore and across greater Auckland is not a luxury – it is a requirement for business growth, business investment, attraction, staff and client retention. Over 84%⁷ want reduced congestion and improved reliability across the transport network, 48%⁸ need improved infrastructure, and 47%⁹ request more transport services and options.

Since 2010, Business North Harbour has invested in the employment of a dedicated transport project representative, to educate and influence commuters as to the diverse transport solutions for employees, students and visitors to the North Harbour BID area. The impact of \$700,000 investment across our transport programme, has been restricted through the lack of an appropriate and efficient public transport network, to link commuters with the central hubs – Constellation Drive Park and Ride, and Albany Park and Ride, and the provision of adequate feeder routes from these hubs.

We support the implementation of the new **Public Transport Review Network North** timetable coming into effect 1 October 2018. However, we do so with reservation as based on our research as reported within previous submissions¹⁰, that key issues raised remain outstanding. Without evidence to the contrary, we do not believe the proposed feeder routes will meet the potential demands for East Coast Bay's commuters, or those travelling from West Auckland.¹¹ This is a significant restricting factor in realising the efficiencies forecasted, and we request further consultation between Auckland Transport and interested parties, including Business North Harbour.

The context of our commentary concerning the Public Transport Review North is to highlight issues raised by members concerning the proposed Regional Fuel Tax.

(2) Financial impact of the proposed Regional Fuel Tax

Auckland Council's consultation documentation¹² states that the proposed Regional Fuel Tax is likely to cost \$140 per year for the average household. We draw your attention to this being based on an **average residential consumption – not commercial.**

Fifty five percent of our business owners chose North Harbour as the location due to proximity to their home, 15% value access to skilled and educated local workforce.⁸

⁷ Source: Business North Harbour's Membership Survey 2017

⁸ Source: Business North Harbour's Membership Survey 2017

⁹ Source: Business North Harbour's Membership Survey 2017

¹⁰ Business North Harbour (previously NHBA) Submission: PT Network Review North 2014, and PT Network Re-Review 2017 and subsequent reports – available on request.

¹¹ As an aside to this submission on the Draft Long-Term Plan 2018-28, we request a formal review by AT Metro, April 2019 to report on the uptake and deliverables against their success modelling for PT Network Review North as referenced above.

¹² Consultation Document – The 10-year Budget and Auckland Plan 2050 (page 19)

Despite taking into consideration the impact of business location choices, our research disputes Council's \$140 per year for the average household assessment. Based on the AA's average petrol consumption¹³, the impact of the proposed Regional Fuel Tax is detailed below:

- **Estimated cost per user (not household) for** a 1500-2000cc vehicle would be \$190.57 plus GST (25,000 km/pa) per year
- **Estimated cost per user (not household) for** a 2001-3500cc vehicle would be \$236.51 plus GST (25,000 km/pa) per year
- **Estimated cost per user (not household) for** a 3501cc+ vehicle would be \$291.64 plus GST (25,000 km/pa) per year

Please note that the AA's modelling is based on \$1.91c/litre fuel costs, which under presents the current reality of the true costs of operation faced by North Harbour business and commercial owners, and their employees.

As previously stated, unlike other areas across Auckland, North Harbour commuters, or commercial property rate payers, cannot benefit directly from Council's investment in rail and comprehensive public transport networks to provide our commuters with modal choice. Our commuters: employees, students and trade visitors, do not have the same options to mitigate the commercial and personal cost of the proposed Regional Fuel Tax with alternative modes of travel.

Finally, we draw your attention to the Assessment Criteria against statutory criteria^{14, 15} in which Council outlines their decision-making process. We quote *'...the assessment of benefits from transport activities will vary depending on how much weighting is given to businesses providing them access to customers and a workforce, in comparison to the weighting given to individuals who have access to goods and can gain meaningful employment.'*

If business is to offset the surety of the Interim Transport Levy: a fixed value per **property** versus the uncertainty of calculating the true costs **per user** of the proposed Regional Fuel Tax, then higher weighting needs to be given to businesses to ensure economic hubs such as North Harbour remain viable for the future generations.

¹³ AA Petrol and Diesel Running Cost Report 2017

¹⁴ Auckland Council 10-year Budget 2018-28, Supporting Information, Section 7: Additional supporting information, 7.3 Attachment B: Assessment against statutory criteria

¹⁵ Auckland Council 10-year Budget 2018-28, Supporting Information, Section 7: Additional supporting information, 7.3 Attachment B: Distribution of benefits between the community as a whole; any identifiable part of the community; and individuals

(3) Proposed Regional Fuel Tax Feedback

We **support** the need for additional investment to improve the current transport system.

Our members **agree** that the impact of population growth, the resulting congestion and, environmental consequences must be mitigated to enable the efficient movement of freight and people, if the city is to continue to function. We agree that building more roads is not the only answer, and better demand management of the existing network is critical if we are to provide the priority for freight and commercial trade movements our members seek.

We note that Central government introduced **The Land Transport Management (Regional Fuel Tax) Amendment Bill**, 22 March 2018,¹⁶ which will enable Auckland Council to seek funding for specific transport-related projects. We note that it is the intention of central government to pass the law in June 2018, ready for potential implementation 1 July, thereby removing the need for an extension of the Interim Transport Levy beyond 30 June 2018. If legislation is not in place before 1 July 2018, we support the Interim Transport Levy remaining set as \$113.85 per annum for residential and farm/lifestyle ratepayers and \$182.85 per annum for business ratepayers for a further twelve months to enable the amendment to legislation be passed.

We ask that as the legislation is drafted, Auckland Council advocates for the GST portion to also be hypothecated to Auckland's transport projects/services and that non-road fuel not be subject to the tax.

Auckland Council proposes to raise \$1.5 billion over the 2018-28 Budget through the introduction of a Regional Fuel Tax of \$0.10c per litre plus GST. Administration and set up costs for the RFT are estimated at \$35.5 million (2018-28).¹⁷

We challenge central and local government to develop **alternative funding models** other than just fuel pricing models. Our member's preferences have been previously recorded¹⁸ for road user charges, congestion charge modelling, public/private partnerships, as mechanisms to fund transport infrastructure projects – projects which address the limitations to economic growth, the loss of productivity, faced by businesses based in North Harbour, and indeed the North Shore.

Business North Harbour was clear in our Auckland Council 10-year budget submission, that any support for the RFT was as **an interim solution**, and on the basis that the funds were hypothecated for spending on transport projects which were evenly distributed across Auckland.

¹⁶ <https://www.beehive.govt.nz/release/regional-fuel-tax-auckland-step-closer>

¹⁷ Auckland Council 10-year Budget 2018-28, Supporting Information, Section 7: Additional supporting information, 7.1 Transport funding.

¹⁸ Business North Harbour submission: Auckland Council Long-term Plan (2012-22)

(4) Proposed Regional Fuel Tax Projects

Project 1: Bus Priority Improvements

We **support** the need to change commuter behaviour, and to encourage those who are not reliant on their car during the day, to use public transport.

For this to be effective, investment is required to the customer experience be that through improved facilities, increased reliability and frequency of service, value for money, improved real time information.

Other than improvements previously signaled through the Northern Corridor Improvement Project (Northern Busway extension, proposed Rosedale Bus Station), there are no additional RFT funded projects of direct benefit to our members or their employees

As previously indicated, section 1) of this submission, we have reviewed the proposed **Public Transport Review North 2018** and have ten routes which will not meet the needs of employees who responded to our survey, indicating they would use public transport if the service was available¹⁹ as a bare minimum.

Project 2: City Centre Bus Infrastructure

We acknowledge the proposed investment in Lower Albert Street for the North Shore busway. Increased investment in the end of journey destination should not be at the expense of the origin. For example, creating more capacity for those commuters working within the CBD is commendable, but not if those commuters cannot conduct their journey door-to-door using public transport. Park and Ride facilities at Constellation Drive, Albany and Silverdale are oversubscribed.

Project 3: Improving Airport Access

In principle we support improved access to the airport, especially if it provides seamless access via public transport from the North Shore.

Project 4: AMETI Eastern Busway

This project is the third largest investment from the RFT budget at \$201m. The benefits are stated as being an increase of public transport usage from 5.8% - 13% of journeys. In the absence of further ROI details, it is difficult to make an assessment as to whether this is the best use of \$201m.

Project 5: Park and Rides

The Northern Busway has just celebrated it's 10th birthday. Opened in 2008, it carries more than 5 million passengers each year. This patronage has risen from 2.5m just four years ago.

As stated in the RTLP documentation, parking at these facilities is at capacity (Albany and Constellation Drive Park and Ride are at capacity by 7am based on Business North Harbour's commuter research).

¹⁹ Business North Harbour (previously NHBA) Submission: PT Network Review North 2014, and PT Network Re-Review 2017 and subsequent reports – available on request.

While there is an acknowledgement that the significant overflow onto surrounding streets affecting amenity and accessibility of town centres and residential areas, there is no mention of the same significant impact on commercial locations. Business North Harbour is one of Auckland's largest commercial and industrial Business Improvement District. The efficiency of businesses located by Constellation Drive and Albany Park and Rides are impacted daily through employees and trade visitors not being able to access on street parking, or their reserved on-site parking facilities, as they reasonably could expect in a different location.

RFT investment across Park and Ride facilities is proposed at \$24m which we consider is **completely inadequate**, especially when growth of public transport is a revenue generating activity for Auckland Council through their Council Controlled organisation – Auckland Transport.

Project 6: Electric trains and stabling

Our support for electric train investment is conditional upon this investment **improving capacity** for freight and business services distribution. We request further information which supports the investment of \$213m, plus the additional operational cost, \$129m.

We are concerned that the significant works planned such as light rail will result in disruption detrimental to businesses and we ask that any disruption be properly mitigated, and transparently funded through a development response budget.

We acknowledge the population growth of South Auckland, but also draw attention to the growth of the North Shore. In particular – Albany, Silverdale, Warkworth and beyond. This growth is both population and economic and warrants recognition in the allocation of RFT generated investment. To put this statement into context, UHLB's population grew 4% in 2017, compared to 2.1% nationally. UHLB's population is expected to exceed 93,000 in 2033 which reflects a 64% growth from 2013²⁰. Auckland Council's Development Strategy²¹ details the planned intensification of growth across the northern boundary of the city.

We question the extent of the \$213m investment in electric trains and stabling. Our members will make a considerable contribution due to the distances travelled and in the absence of any other viable means of commuting (refer section 2 – above), without any consideration being given to a feasibility study on bringing forward rapid transit investment to the North Shore.

Project 7: Downtown Ferry Redevelopment

There are no ferry services operating within our business improvement district, therefore we have no comment.

Project 8: Road Safety

We support improvements in road safety and will continue to consult with Auckland Transport on local engineering projects which increase safety when entering or leaving commercial and retail premises and entering and exiting local roads and arterial routes.

We are concerned that the significant works planned such as cycleways and walkways and road realignments, will result in disruption detrimental to businesses. We ask that any disruption be properly mitigated.

²⁰ <https://ecoprofile.infometrics.co.nz/Upper%2bHarbour>

²¹ <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/development-strategy/Pages/default.aspx>

Project 9: Active Transport

We accept the positive impact active transport has on mental well being and public health. However please refer to our GPS 2018²² submission in which we outlined our concerns when creating cycling networks in locations best suited for light industrial and commercial activities.

Project 10: Penlink

We thank you for acknowledging that the growth and development around Silverdale has been faster than expected and requires planned investment to be brought forward.

We support the user pay model proposed, but strongly recommend that the investment is future proofed, and the provision is made now for a four-lane highway. Two lanes by the time of construction will provide a temporary fix. Our feedback from the Hibiscus Coast community is that they would support the additional investment now.

Project 11: Mill Road

Our interest in this project is restricted to the potential for improved inter-regional freight movements and resilience for the Southern Motorway. If these outcomes can be substantiated, then we support in principle this investment.

Project 12: Road Corridor Improvements

We agree that congestion on the arterial network is a significant concern, especially congestion on the freight network. In the RLTP material you reference to an expected 72% growth of freight cartage by 2046²³. We are concerned that the freight kilometres travelled are projected to increase by 53 percent over the same period, a projected increase of 85 percent. We seek evidence that the proposed \$389m, of which \$87m is being generated through the RFT, will be sufficient to cope with this freight demand growth.

While we agree that corridor improvement is important, we ask that the emphasis be first on improving connections to existing urban areas, the efficiency of existing urban corridors and improving access to the Ports of Auckland and Auckland Airport²⁴.

Project 13: Network Capacity and Performance Improvements

We **agree** that Auckland needs to make better use of its existing transport system to increase the number of people who can travel through key routes and corridors. We also support Auckland ensuring that the operation of existing transport infrastructure and services are optimised. The efficiency and coordination of traffic signals must be improved to enhance throughput and reduce delays. More dynamic traffic lanes must be introduced to improve peak traffic flows, and to provide priority to freight movements on key freight connections.²⁵

We request more collaboration between Auckland Transport, ATOC, NZTA and NZ Police to ensure the technical resources each organisation has invested in for surveillance and traffic management, traffic safety, are shared to maximise benefits at minimum costs.

²² <http://businessnh.org.nz/media/files/Advocacy/Business%20North%20Harbour%20Inc%20Submission%20GPS2018%20FINAL.pdf>

²³ National Freight Demand Study 2014

²⁴ Draft Auckland Regional Land Transport Plan 2018-28, page 45.

²⁵ See *Draft Auckland Regional Land Transport Plan 2018-28*, page 40.

Project 14: Growth related plans.

We commend the allocation of resources for the development of cross agency strategic transport network plans.

We strongly recommend that the focus on urban development expands to include transport infrastructure resourcing to create significant economic hubs. The option for local employment not only delivers a regional benefit through decreased transportation demands, but it also adds value to lifestyle and community outcomes.

(5) Transport Infrastructure Funding Feedback

As previously stated, Business North Harbour and their members are in **agreement** with local and central government of the need to invest additional funds to address congestion and loss of productivity across Auckland.

We note that a regional fuel tax of \$0.10 cents per litre plus GST, (whilst set at the highest levy proposed under The Land Transport Management (Regional Fuel Tax) Amendment Bill), is only a small element of the Auckland Transport Alignment Project (ATAP). We note that of the \$28bn ATAP package, \$8.45bn is from Auckland Council rates, development contributions and borrowing, with the balance of council's contribution being the assumed \$1.5bn from RFT²⁶.

If central government's investment of \$16.3bn from the National Land Transport Fund is not delivered due to the projects not meeting the 'on merit allocation' requirement, then the ATAP projects will need to be reprioritised. If the assumptions made of further Crown rail contribution towards the city rail link is not delivered, again this shortfall will need to be found elsewhere.

To mitigate this high level of uncertainty, we challenge central government to reassess their debt ratios and provide additional financial commitment needed to ensure the delivery in their entirety, the projects outlined in ATAP.

Our collective concern relates to transparency, fairness and resilience.

Transparency:

Numerous members have raised questions concerning the validity of the proposed RFT consultation process.

The Land Transport Management (Regional Fuel Tax) Amendment Bill seeks to insert a new subpart 3 into part 2 of the Land Transport Management Act 2003, which provides a process for establishing a RFT. That process includes *'a council making a proposal that sets out the proposed tax rate, the duration of the tax, the transport programme and projects that the tax will fund, and how the proposal contributes to the relevant regional transport plan, the relevant Government Policy Statement on land transport, and any other relevant document specified by the Minister of Finance and the Minister of Transport (the joint Ministers) that sets out transport priorities for the region: • a council consulting the community before finalising a proposal...'*

Auckland Council sought approval during their 10-year Budget consultation process for the proposed RFT without providing detail as to where the funds raised (\$1.5bn) were to be spent. Business North Harbour find this **totally unacceptable** that our members were being asked to make a financial decision which impacts not only their cost of operation – but also their employees without details of any benefits they could expect from the associated costs.

²⁶ ATAP, section 2, page 11 ATAP funding priorities

Currently there is no viable public transport alternative to link business and employees within North Harbour for 35,000 commuters.

Currently there are no viable alternatives to the motor vehicle for daily business activities.

We accept that the delayed release of the GPS and ATAP may have restricted council's ability to provide clearer intent. However, to avoid levels of skepticism that is currently felt amongst the business and ratepayer community, council may have been better advised to have retained the ITL for a further period until the central government direction had been confirmed. This would have enabled Auckland Council's consultation on the proposed RFT to be delivered with project detail to enable Aucklanders to make an informed decision.

Further fuel pricing increases (fuel excise duty and road user charges) were signalled through the GPS 2018. While we accept there are no set dates for these increases, our members have questioned why central government's intent was not more clearly signalled at the time of the proposed RFT consultation. Member feedback has been that if they had been aware, that their interim support for the RFT may have varied. This appears to be a view shared by 10,600 other Aucklanders – based on the below poll – recorded on Auckland Council's Facebook portal.



The inflationary impact of the proposed RFT **and** the fuel excise duty/road user charge increases are significant. No evidence has been supplied to support how fuel pricing management changes commuter behaviour. We request this modelling and business case analysis so that we can communicate the outcomes to our members.

Fairness:

As outlined in Council's consultation documentation²⁷ in determining its funding sources for an activity the Council must consider the criteria in the Local Government Act 2002 101(3).

1. For the proposed options to fund additional transport investments, council must consider, in relation to this activity:
 - a. the community outcomes to which the activity primarily contributes
 - b. the distribution of benefits between the community as a whole; any identifiable part of the community; and individuals
 - c. the period over which the benefits are expected to occur

²⁷ Auckland Council 10-year Budget 2018-28, Supporting Information, Section 7: Additional supporting information, 7.3 Attachment B: Assessment against statutory criteria – general rates

- d. the extent to which individuals or a group contribute to the need to undertake the activity
- e. the costs and benefits (including consequences for transparency and accountability) of funding the activity distinctly from other activities.

Having considered these matters, Council must stand back and consider the overall impact of any allocation of liability for revenue needs on the community. This involves elected members exercising their political judgement and considering the proposal in the context of Council's funding decisions.

We **accept** that there are more projects across Auckland than funds available to deliver.

We **accept** that the projects identified which will be funded through the proposed RFT and RLTP will be beneficial to Auckland and will improve the city's transport infrastructure.

Despite that, Business North Harbour is concerned that the project allocation shown within the draft RLTP 2018-28 and proposed RFT projects, do not in all fairness, benefit North Harbour at a rate which is reflective of the financial contribution received. We look forward to receiving evidence from Council which disproves this viewpoint. And more importantly, when the level of investment in North Harbour will increase.

Future ready:

Our review of the Auckland Plan 2050, GPS 2018, draft RLTP 2018-28, Auckland 10 year Budget 2018-28, has raised concerns as to the future capacity of the Auckland Transport Network.

We acknowledge the key projects which are being progressed across the region.

However there appears to be a critical project without budget or definitive timeframes. We fail to understand how the plans and investment outlined in the short-medium term (RLTP 2018) will suffice without the commitment from central and local government for an **Additional Waitemata Harbour Crossing**.

It is with urgency we request that provisions are made to take forward the work that has already been done on this project, which highlights that the capacity of the public transport network is restricted without an additional crossing. The same restrictions apply to housing, freight and employment growth.

We strongly request funding to review and update the North Shore Rapid Transit Network Strategic Case as completed by Auckland Transport's Strategy Division, August 2016²⁸. Business North Harbour is a willing stakeholder in these discussions. We support investment in the development of a business case for the AWHC.

(6) RTLP Projects

While we agree overall with the challenges you have identified (safety, congestion, decreases in accessibility, impact on the environment and supporting growth), improving network capacity and performance by making the most of the existing transport system is key.

You have properly said that this must focus on optimising the transport network through targeted changes, such as improving the coordination of traffic lights, the use of dynamic lanes at peak times, and removing bottlenecks to mitigate congestion. Maximising the benefits from new

²⁸ <https://at.govt.nz/media/1971736/north-shore-rtn-strategic-case-draft.pdf>

technology and taking opportunities to influence travel demand are also important, as well as introducing pricing to address congestion as soon as possible.²⁹

Collectively, improving network capacity and performance has been identified as the highest priority transport challenge. Freight, commuter (employee), commercial trade visitors are being impacted by peak and interpeak congestion. Accessibility is compromised currently. Projected population growth will only exacerbate accessibility issues.

On review of the committed projects, we note only **two** for this area. We acknowledge the \$1m committed for the **first project** - to progress Albany Park and Ride development (stage one) but seek further details regarding the extent and timelines associated with this project.

The **second project** is the Rosedale and Constellation Bus Stations. The former is still in consultation stage, with our support contingent on being satisfied that there will be adequate public transport feeder routes supplied to avoid the projected 4000 commuters not needing more than the 40 carparks provisionally provided. From experience we know the impact of under supplied parking at bus hubs has on the surrounding businesses. We will continue to work with AT and NZTA to mitigate what we see as significant risk to the operational ability of the Rosedale area. We will continue to seek additional funding to allow for future proofing the main arterial routes feeding the bus station. We seek further details regarding the development of Constellation Drive Park and Ride as it was not clear from the documentation as to what was being funded.

Auckland Transport Capital Unfunded Projects which affect North Harbour are:

Northern Busway Enhancements	\$120m
Infrastructure supporting developments in Albany Centre	\$17m

We require further information before making comment, other than to say that the Northern Busway's proven performance and contribution to Auckland Transport's Public Transport, we would expect, justify prioritisation over other areas in Auckland. The projected growth of the Albany Centre – both retail and commercial, would also in our view, justify continued investment due to the impact this growth is having on the local infrastructure.

We acknowledge NZTA's Investment Programme - committed and major ATAP initiatives,³⁰ which details their \$885m commitment for the **Northern Corridor Project (2018-21)**. We appreciate that this project was brought forward through central government's intervention, May 2014, and their provision of an interest free loan of \$375 million (to be repaid 2026/27) (Accelerate Auckland Transport Projects). We are concerned that the significant works planned may result in disruption detrimental to businesses and we ask that any disruption be properly mitigated, and transparently funded through a development response budget.

We also acknowledge further investment in **SH1 North of Albany (\$332m)** which seeks to improve travel time reliability between Albany and Orewa, bus shoulder provisioning, and upgrades to the Silverdale Interchange.

Thank you for your time spent reading this submission.

Please note: that we request the opportunity to speak to this submission in due course.

²⁹ See *Draft Auckland Regional Land Transport Plan 2018-28*, page 40.

³⁰ *Draft Auckland Regional Land Transport Plan 2018-28*, appendix 2, NZTA Investment Programme

Submission to THE REGIONAL LAND TRANSPORT PLAN From the Campaign for Better Transport

Submitted by Graeme Easte on behalf of the CBT Committee

Contact details:

Email: Graeme@pastfinder.co.nz

Phone: 027=2-9-7565

Support for the RLTP

CBT is very supportive of the Draft Regional Land Transport Plan (2018-2028), but make the following comments.

Mode Share

CBT supports the implied aim of reducing single occupant car use by making substantial improvements to the public transport network which would provide Aucklanders with genuine transport choices. While many focus on dealing with congestion, the only effective solution to clogged roads is to reduce demand (by providing alternatives) rather than increase supply (the old-fashioned predict-and-provide approach which leads to an endless cycle of road widening which only induces yet more traffic).

However, there needs to be a more explicit statement of intent on the contribution of public transport – a goal or set of goals to aim for. This would be best expressed in terms of mode share rather than absolute numbers of passengers – e.g. moving from 10-15% of all journeys by public transport to (say) 25% by the end of the decade (hopefully we will go beyond that in future decades). This also needs to be clearly stated up front – literally on page 1 where it will be noticed, rather than buried deep within the document as with the final text of ATAP.

Congestion-Free Network

CBT supports moves towards the establishment of a fast and frequent Congestion-Free Network across the built up areas of the region. In particular:

1. Extending the electrified rail network to the South in the short term and also to the North West. However we note that while the electrification from Papakura to Pukekohe is funded there is no assured funding for new stations along the way at Paerata and Drury. We also strongly support moves to triple-track the Southern line – but suggest future-proofing to allow for an extra track to be added when required – e.g. bridges built to cater for a future fourth line.
2. Extending the busway network such as pushing the Northern Busway up to Silverdale and actually building the AMETI busway to the Eastern suburbs. We also support extensions to the bus priority lanes which are currently almost entirely on the isthmus – there is huge potential for new lanes beyond the isthmus – e.g. the feeder routes on the North Shore connecting with NEX.
3. CBT supports the light rail projects as proposed, but also advocate for the Puhinui link to the Airport to be a light rail route extending East through Wiri to Botany and possibly Howick. Given that much of the CBD-Airport line will be on-road there will be considerable disruption both to traffic and affected businesses and residents. Such disruption could be minimized by pre-fabricating segments

of the track-bed off-site. There will also be problems managing access to properties and side-roads along the way – if right-turns are to be banned (i.e. access is restricted to left-turn out and left-turn in) then some form of U-turn facility may be required at say 1km intervals along the affected roads (just as they have on the arterial roads in Noumea which have frequent roundabouts)

Car Parking

The Draft RLTP makes no reference to car parking except in terms of new or improved park-and-ride facilities at peripheral transport hubs. Easy access to car parking is a significant contributor to our high dependency on car travel – curbing that access would provide an incentive to change from commuting by car to patronage of public transport. To be effective there would need to be action on both private and public car parks as follows:

1. a gradual reduction in publicly supplied parking (on and off-street) in and around major centres which are well served by public transport. Copenhagen has been quietly but deliberately reducing their public car parking supply by 2% every year for decades (as Jan Gehl has told us – the trick has been to do it slowly but consistently), which has helped decongest their inner city and increased PT use.
2. a targeted rate on land used for car parking – this would provide a small additional source of funding for transport projects and act as an incentive for land owners to make more productive use of their land. For practical reasons, properties with small car parks (say under 10 spaces) would be exempt. This may require a law change to distinguish between the area of the whole site and the area actually dedicated to parking. All of the money raised from such a rate should be targeted for transport – perhaps ring-fenced for more appropriate parking projects (e.g. park and ride facilities in appropriate places, and mitigation parking facilities for suburban shopping centres facing loss of kerb-side parking to make way for light rail, bus ways and extensions to the bus priority lanes.)

Safety

CBT supports the emphasis on safety in the draft plan.

Although much of the safety emphasis is likely to be on arterials, major intersections and accident black spots – there needs to be a region-wide approach to traffic calming in suburban back streets. Historically this has been done on an ad hoc basis – generally responding to concerns raised by residents in particular communities rather than across whole suburbs, let alone the entire built-up area of the region. This has led to a patch-work where some suburbs have had little or nothing and those which do have considerable variation in the mix of traffic management features used (speed humps, chicanes, side islands, road markings and signage, etc.). Now that the law has been changed to allow variable speed limits there are calls for 30 or 40kmph zones to be introduced. The point is that Local Area Traffic Management needs to be managed coherently across the region – especially with increased devolution of funding to the 21 Local Boards. The alternative is to have a confusing mis-mash mitigating against compliance and effective enforcement.

Sustainability

CBT supports measures to improve environmental sustainability, such as increased use of LED lighting and more effective stormwater treatment through incorporating rain gardens

and treatment ponds into new works. We also request all new major urban developments should have a transport assessment that clearly outlines how people and goods are to be moved both to and from, and in and around that site, from a sustainable, multi-modal perspective.

We also call for more work on identifying and protecting key routes for future transport corridors – the sorry saga of rail to the Airport is a perfect case-study of how not to do it (after 14 years we still do not have a protected route through Mangere). We are told that there may be some legal impediments to designating routes too far in advance of actual construction – if that is true then we should be lobbying for a law change.

Railway Level Crossings

CBT supports the establishment of a substantial fund to make a start on grade separating our level crossings. We note that while this is widely held to be a safety issue, it is also a significant traffic congestion issue on the affected arterials – right now the barrier arms are down for 17-35% of the time during the peak hours but post CRL these times will more or less double so there is some urgency to get on with the job.

There is a down-side to assigning all funding for this project to Kiwi Rail and that is the risk that they may see themselves as being the only party involved. KiwiRail need to be told that while they may be the lead agency there are others with an interest, in particular AT and the affected local communities.

Regional Fuel Levy

CBT supports the RFL as an interim measure. While it is not necessarily the best or fairest scheme that can be imagined, it has one huge advantage over every alternative that has been proposed and that is that can be implemented this year.

However, we are concerned about the amount going into major new roads in the green field areas - noting that this risked incentivising sprawl at the very time when we should be emphasising compact development within the existing urban area.

Submission by



to the

Auckland Council

on the

**Draft Auckland Regional Land Transport
Plan 2018 -2028**

May 2018

About the EMA

The EMA has a membership of more than 4000 businesses, from Taupo north to Kaitaia, representing around 40% of the New Zealand workforce.

The EMA provides its members with employment relations advice from industry specialists, a training centre with more than 600 courses and a wide variety of conferences and events to help businesses grow.

The EMA also advocates on behalf of its members to bring change in areas which can make a difference to the day-to-day operation of our members, such as RMA reform, infrastructure development, employment law, skills and education and export growth.

We have a solid reputation as a trusted and respected voice of business in New Zealand, and our presence makes a difference. Therefore, we are constantly called on to speak at conferences, comment in the media and partner or provide advice to Government on matters which impact all employers (such as ACC, health and safety, pay equity).

CONTACT

For further contact regarding this submission:

Alan McDonald

General Manager – Advocacy
Employers and Manufacturers Association
Private Bag 92066
Auckland 1142

Telephone: 09-3670934
Mobile: 027 809 4398
E-mail: alan.mcdonald@ema.co.nz

Thank you for the opportunity to submit on the Auckland Regional Land Transport Plan 2018-2028.

General Comments:

1. The EMA is generally supportive of the programme outlined in the in the Draft Regional Land Transport Plan (the Plan), its purpose and scope.
2. We accept that Auckland Transport's strategy has to work within the constraints/guidelines of various central and local government plans and visions while not necessarily agreeing with the strategic focus or priorities outlined in those plans.
3. Our organisation has consistently demanded faster time frames for delivery and we maintain the Plan and the associated Auckland Transport Alignment Plan (ATAP) lack ambition in terms of the time frame for delivery of various projects.
4. The EMA also has concerns that some projects in the Plan, especially Penlink and Mill Rd, appear to have much longer time frames for implementation than the priority recent Government announcements appear to give those projects.
5. This may just be a simple matter of process but we look forward to clarification on timing differences with these projects.
6. In general the EMA would also like to see greater emphasis placed on traffic management tools available now to help manage congestion and traffic flows and plans to better utilise under-used parts of the roading network such as busways, T2, T3 and clearways.
7. Long intervals between buses and peak times, especially on key arterial routes – followed by potential passengers being left stranded by full buses – indicates less than optimal use of the busway network. The dedicated North Shore busway remains under-utilised with constraints on park and ride facilities and less than optimal transport links to the busway stations continuing to hamper its maximum efficiency.
8. Also missing from the plan is a discussion of outcomes and quantifiable gains.
9. Will the plan just keep up with congestion, get ahead of it or simply minimise the losses as population and vehicle fleet growth continues at a rapid pace?

The Challenge

10. The EMA agrees with the scale of the challenges outlined in the plan as they reflect both the underinvestment and lack of forward planning that has plagued Auckland's transport infrastructure for several decades.
11. They also reflect the scale of population and vehicle fleet growth and the difficulties of moving both freight and commuters through the network.

12. The EMA is concerned that a number of the projects outlined in the plan focus on moving people to and from the city centre while perhaps not enough attention is focussed on significant congestion and choke points across the wider network.
13. One significant issue that does not appear to be addressed in this section is the better co-ordination of land use and transport planning.
14. The completion of the recent Unitary Plan, a document the EMA also largely supports, again highlighted this failure of co-ordination between the two critical parts of urban planning. Under the Unitary Plan many areas and corridors given approval for densification are already among the most congested suburban routes and arterials on the Auckland network.
15. And we continue to see green and brownfields development in areas that are clearly lacking supporting transport infrastructure. Congestion at Riverhead, Kumeu and other areas of the northwest again highlights the lack of planning and provision for supporting transport infrastructure in tandem with residential/business development.

Regional Fuel Tax

“Gas (petrol) tax is a dinosaur tax. It’s an Industrial Age solution for a Post-industrial Age.”
– Portland Metro Council Chief Operating Officer, Martha Bennett.

This quote came from a discussion with the City of Portland on funding transport networks during Infrastructure New Zealand’s recent fact finding delegation to the United States.

Portland, a city and metro area covering roughly 2.8 million people (where Auckland appears to be heading) is internationally regarded as having one of the more successful public and integrated transport networks. It uses a mix of streetcars, light rail, aerial cable cars and road transport to both drive regeneration in the city and surrounding districts and move its rapidly growing population.

It is widely regarded as one of the best places to live in the US and with significant clothing, footwear (it’s Nike’s international headquarters), medical, university and tech industry hubs it is also one of the fastest growing cities in the US. As a consequence it is struggling to keep people and freight moving around the city and facing issues of housing availability and affordability.

The point is:

16. That while the EMA does not oppose the proposal for a Regional Fuel Tax, we don’t believe it is the best option for decongesting Auckland’s transport network nor do we believe it is the best option for funding future upgrades to the network to try and meet or get ahead of projected population growth and worsening congestion.
17. Portland, like many other cities around the world, is looking at other alternatives to fuel taxes with the greatest focus going on time of use, distance covered, toll lanes, HOV/Expressway tolled lanes and GPS based flexible congestion charging regimes.
18. Several years ago the EMA was part of a Regional Land Transport Committee tasked with identifying possible alternatives for funding transport in the region. That group found that while Fuel Tax was an option it was not the most favoured option.

19. The EMA's position is unchanged from those findings.
20. A petrol tax is a very blunt instrument that is unlikely to raise the \$150 million per annum currently in the media (petrol companies have told us this figure does not reflect current sales let alone leakage that will occur from the imposition of a tax and subsequent collection costs).
21. Even if introduced as an interim step it will do nothing to address the more pressing issue of congestion that is currently costing the Auckland and national economies between \$1.3 - \$2 billion as per the NZIER research commissioned last year by the EMA, Infrastructure NZ, Ports of Auckland Ltd, Auckland International Airports Ltd and the National Road Carriers Association.

Our view is

22. That a congestion charging regime on the motorway system should be introduced a priority using existing, available number plate recognition technology as already used on the northern motorway and other toll roads around the country.
23. There is no need to wait for GPS systems being trialled elsewhere.
24. Take the tech industry approach and upgrade as you go from version 1.0 to 1.1, 1.2 etc.
25. The charging regime can be flexible to reflect traffic flows and congestion at various times of the day and can be set at a rate that will both influence behaviour – taking traffic off the system at peak times – while also raising funds for dedicated transport projects for both public and private transport options.
26. Unless Auckland introduces new revenue sources the region will never be able to afford the public transport system required or start addressing the pressing congestion issues already plaguing both freight and commuter traffic.



Kim Campbell
CHIEF EXECUTIVE



Draft Proposal for a Regional Fuel Tax and Draft Regional Land Transport Plan

FEEDBACK FORM

Feedback must be received by 8pm on Monday 14 May 2018.

Please read the documents available at akhaveyoursay.nz or at any library, service centre or local board office before you give feedback. They have more information about the issues and choices that we want your feedback on.

All of the questions below are optional. We encourage you to give feedback online at akhaveyoursay.nz, or you can complete this form and return it to us using one of the options below.

Email

Scan your completed form and email it to akhaveyoursay@aucklandcouncil.govt.nz.

In person

Drop your completed form off at your local library, service centre or local board office.

By post

Place your completed form in an envelope and send it to freepost address:

AK Have Your Say
Auckland Council
Freepost Authority 182382
Private Bag 92 300, Auckland 1142

Your name and feedback will be included in public documents. All other personal details will remain private.

First name: Richard

Last name: Gardner

Email address or postal address:

rgardner@fedfarm.org.nz

Your local board:

Is your feedback on behalf of an organisation or business?
(If yes, this confirms you have authority to submit on the organisation's behalf)

Yes No

Name of organisation or business:

Federated Farmers of New Zealand

The following information is optional but will help us know whether we are hearing from all Aucklanders.

Are you: Female Male Gender diverse

What age group do you belong to?

Under 15 15-24 25-34 35-44
 45-54 55-64 65-74 75+

Which of the following describes your ethnicity?
(Please select as many as apply)

Pākehā/NZ European Māori Samoan
 Cook Islands Māori Tongan Chinese
 South East Asian Korean Indian
 Other (please specify)

Do you consider yourself part of the following communities?

Rainbow (LGBTQIA+)
 Disability

QUESTIONS RELATING TO THE DRAFT PROPOSAL FOR A REGIONAL FUEL TAX

To answer the following questions, please read the draft proposal document. All of these questions are optional.

Question 1

Without a Regional Fuel Tax (RFT) the funding available will only cover renewing our existing transport network and the projects we have already committed to for example the City Rail Link.

To enable us to deliver projects that improve congestion, public transport and road safety, we recommend an RFT of 10 cents per litre plus GST (11.5 cents). What is your opinion on this proposal?

Support Do not support Other

Please comment:

Question 2

We are proposing the RFT funds the projects listed below.
How important are these projects to you?

	Very important	Moderately important	Less important
Project 1: Bus priority improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 2: City centre bus infrastructure (facilities)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 3: Improving airport access	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 4: AMETI Eastern Busway	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 5: Park and rides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 6: Electric trains and stabling (storage facilities)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 7: Downtown ferry redevelopment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 8: Road safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 9: Active transport (walking and cycling)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 10: Penlink	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 11: Mill Road Corridor	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 12: Road corridor improvements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 13: Network capacity and performance improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 14: Growth related transport infrastructure (transport services and facilities for new housing developments)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Any other comments?

The relative importance of the projects are indicated from a rural point of view. No comment is made on the relative importance of projects that are primarily urban focussed.

QUESTIONS RELATING TO THE DRAFT REGIONAL LAND TRANSPORT PLAN

To answer the following questions, please read the draft document. All of these questions are optional.

Auckland's recent significant population growth has increased demand on the transport system and caused challenges that need to be addressed over the 10 years of this plan. These issues include:

- safety
- impact on the environment
- congestion
- supporting growth in the region.
- decreases in accessibility

Question 3

Do you think we have correctly identified the most important transport challenges facing Auckland? Yes No

If No, what do you think should be included?

Growth in Auckland impacts rural Auckland, which is reflected in a greater need to expand the seal extension program (which the proposal provides for). Perhaps an additional challenge could be "providing for the effects of urban growth on rural areas".

Question 4

To help us understand whether we have the allocation of funding right, please indicate how important the following areas are to you:

	Very important	Moderately important	Less important
Safety: high-risk road upgrades; speed management; monitoring of high-risk areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public transport: extending the rapid transit network; bus priority lanes; new electric trains.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Walking and cycling: cycleways to make cycling safer; new footpaths and widening existing footpaths; promoting walking and cycling.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Supporting growth areas: funding for transport infrastructure in high-priority greenfield areas.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Environment: making street lighting more energy efficient; encouraging use of electric vehicles; reducing pollution from road discharge into stormwater drains.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Network optimisation: dynamic traffic lanes; synchronising traffic signals; optimising road layout.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Corridor improvements: new local roads; upgrades to existing roads; upgrades to State Highways.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 5

Are there any projects or activities you think should be included? Yes No

If Yes, what are these?

There is a need to bring some identified projects forward, and to fund some of the unfunded projects. This is because Federated farmers considers that some of the congestion maps are incorrect, particularly in the South. An example of this is Linwood Road. This is discussed further in the attached Supplementary Comments.

SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



To: AUCKLAND COUNCIL & AUCKLAND TRANSPORT

On the: AUCKLAND COUNCIL'S & AUCKLAND TRANSPORT'S REGIONAL FUEL TAX & REGIONAL LAND TRANSPORT PLAN PROPOSALS

Date: 14 May 2018

Contact: Richard Gardner
Senior Policy Advisor
Federated Farmers of New Zealand

Private Bag 92-066
AUCKLAND 1142

P: 09 379 0057
F: 09 379 0782
E: rgardner@fedfarm.org.nz

SUBMISSION TO AUCKLAND COUNCIL & AUCKLAND TRANSPORT

ON: AUCKLAND COUNCIL'S & AUCKLAND TRANSPORT'S REGIONAL FUEL TAX & REGIONAL LAND TRANSPORT PLAN PROPOSALS

Federated Farmers of New Zealand ("Federated Farmers" or "the Federation") thanks the Auckland Council and Auckland Transport for the opportunity to comment on their Regional Fuel Tax & Regional Land Transport Plan Proposals ("the Proposals").

General Comments

Federated Farmers generally supports the Regional Fuel Tax (RFT) and the Draft Auckland Regional Land Transport Plan 2018 - 2028 (RLTP) proposals. We were pleased to support the regional fuel tax proposal in our submission on the Long Term Plan, but with a proviso that a reasonable proportion of the funds raised be spent in rural areas.

Federated Farmers is pleased to see that there appears to be an appropriate recognition of rural concerns in the Proposals. It seems that a reasonable proportion of the RFT funds will be spent in rural areas, mainly under 2 of the 14 broad "projects" that make up the overall RFT program: "Road Safety" and "Road Corridor Improvements".

Since the reorganisation of local authorities in Auckland in 2010, Federated Farmers members, and other rural road users, have noticed a decrease in the quality of the local roading network, particularly those in rural areas. We became concerned that further underfunding of these areas would result in a significant increase in the long term whole-of-life cost for local roads, in addition to unquantified costs borne by road users.

For our members, as well as primary producers in general, roading remains the critical component of New Zealand's land transport infrastructure. Roading provides vital connections for those living in rural communities, and is an integral component of New Zealand's economic productivity.

The contribution the agricultural, horticultural, forestry, mining and fishing industries make to the national economy, and indeed Auckland's economy in particular, relies heavily on a functional, safe and sound roading network for the transport of inputs, outputs and people. A functioning roading network enables primary producers to efficiently move inputs and outputs, allows farm servicing agencies to access their customers, and allows farmers to access population hubs for the goods and services they require to run their businesses.

The need for an efficient and safe transport network in rural areas is heightened by the practical reality that a large proportion of primary production is exported and traded in competitive international markets, where price is often a significant differentiating factor, with competing producers facing comparatively lower net transport costs.

The local roading network is also important from a social perspective, connecting rural people to neighbours and communities, and connecting isolated rural communities to education, social and emergency services and other basic needs.

Land transport management should be firmly focused on outcomes for users, working across different modes of transport and across the parts of the transport network that are controlled by different bodies. We believe properly functioning roading network provides for efficient movement of freight and people, which recognises that the efficiency of any network is only as good as the least efficient component.

Local roads are a key area of concern for Federated Farmers members. Appropriate funding, efficiently applied, is a fundamental requirement for an efficient and effective roading network. There should be a focus on improving roading investment outcomes and road management practices and decision making, in order to optimise the returns from every dollar spent on roading.

Federated Farmers is supportive of the particular focus the Proposals put on road safety. Our members have been experiencing a greater incidence of potholes, slippage and other related issues, particularly in gravel or unpaved portions of the rural roading network, all of which poses a significant safety risk for rural road users, particularly for roads where there is a high incidence of heavy traffic usage. Where roads that are already sealed have a high crash history, we think use of high grip chip is preferable over signage.

Regarding the Road Corridor Improvements Program, we particularly support the continuation of the Puhoi – Warkworth motorway extension, the new Matakana Link Road and acceleration of the seal extension program in rural areas.

In the south, we particularly support the Mill Road upgrade, although we are concerned that it is not fully funded at this stage.

We consider that the Hingaia stage 2 4-laning needs to be brought forward to fix Linwood Road congestion.

We also think the Pukekohe outer ring freight route and the Waiuku Road / Stuart Road intersection need to be funded to deal with the strategic housing area greenfield development that is happening now.

These matters are discussed further below.

Specific Comments

RFT Project 8 – Road Safety

Federated Farmers is supportive of the particular focus the Proposals put on road safety.

It is considered that the incidence of potholes, slippage and other related issues, particularly in gravel or unpaved portions of the rural roading network, all pose a significant safety risk for rural road users, particularly for roads where there is a high incidence of heavy traffic usage.

Where roads that are already sealed have a high crash history, we think use of high grip chip is preferable over signage.

We also think that rural school bus routes be should be included into the Rural Road Safety Programme, an example being the provision of safe pull off areas where picking up and dropping off students takes place.

RFT Project 10 – Penlink

Federated Farmers acknowledges the appropriateness of the provision of this connection, but it is not considered particularly relevant to the northern rural area.

RFT Project 11 – Mill Road Corridor

Federated Farmers considers that the provision of the Mill Road corridor will benefit rural areas on the south, so is supportive of the project. It is of concern that that it will take some decades to deliver the full corridor, and it is recommended that any new funding that becomes available, such as may be available from the NZ Super Fund, be prioritised to this project.

RFT Project 12 – Road Corridor Improvements

Federated Farmers is particularly supportive of the new Matakana Link Road and acceleration of the seal extension program in rural areas. It is considered that the Matakana Link Road could be a project in its own right.

As regards the seal extension portion of the program, Federated Farmers would prefer that the roads selected for upgrade be genuine corridors, rather than minor roads that serve only a few households, as might be taken from the criteria indicated in the proposal, to "... primarily address issues of dust and amenity ...". As such, it may be appropriate to review the priorities in the Seal Extension Priority Lists and adjust them accordingly.

RLTP Appendices - North

Appendix 1 Table 1A – Auckland Transport proposed Capital Funding Program

Federated Farmers supports the Projects and Programmes listed, insofar as they apply to the northern rural area of Auckland:

- Local Board Initiatives
- Seal Extensions
- Projects funded by Rodney Targeted Rate
- Rural Road Safety Program
- Additional Seal Extensions
- Matakana Link Road

As regards the Seal Extensions and Additional Seal Extensions portions of the programs, Federated Farmers would prefer that the roads selected for upgrade be the roads that link communities, particularly those linking remote communities with larger townships (such as the road linking Tapora to Wellsford), and those providing east – west links (such as the road linking Tauhoa and Warkworth and that linking Ahuroa and Puhoi) rather than minor roads that serve only a few households. As such, it may be appropriate to review the priorities in the Seal Extension Priority Lists.

Appendix 2 – New Zealand Transport Agency Investment Program

Federated Farmers supports the Investment Programmes listed, insofar as they apply to the northern rural area of Auckland:

- Puhoi to Wellsford RoNS Development
- SH1 Puhoi to Warkworth

While welcoming the apparent commitment to continuing some development of a new motorway between Warkworth and Wellsford, Federated Farmers takes the opportunity to express its disappointment at the scaling back of the development, from what was in progress. The level of commitment (of \$30m) to “Dome Valley Safety Improvements” indicates the importance of replacing the section of SH 1 between Warkworth and Wellsford, which the new motorway would achieve. As discussed in the General Comments, farmers in the north of Auckland and in Northland rely heavily on there being good transport links to the Auckland metropolis, both to get their produce to markets in Auckland, and to get their produce through Auckland’s port and airport facilities, and onto world markets.

RLTP Appendices - South

Appendix 1 Table 1A – Auckland Transport Proposed Funded Capital Program

Federated Farmers supports the Projects and Programmes listed, insofar as they apply to the southern rural area of Auckland:

- Local Board Initiatives
- Seal Extensions
- Rural Road Safety Program
- Additional Seal Extensions

However, unlike the northern area, it is considered that a number of the projects listed that appear to be urban focussed do impact on rural areas.

There are two central issues: Firstly, we consider that the congestion maps do not accurately reflect the situation “on the ground”, Linwood Road being an example.

Secondly, in general terms, it is considered that the impact of new housing areas, and Special Housing Areas in particular, is not well reflected in the programmes, although it is acknowledged that there is some uncertainty around where some of the new housing areas will be located.

Comment is made on particular projects, as follows:

- LRGF Hingaia SHA

Federated Farmers recommends that this project be brought forward, alleviate the Linwood Road congestion discussed above.

- Bus Priority: Localised improvements

Federated Farmers considers that the localised improvements criteria should include provision to take into account improvement made to rural communities

Appendix 1 Table 1B – Auckland Transport Capital Program – additional items currently unfunded

Federated Farmers considers that funding should be provided for the following Projects and Programmes, to deal properly and appropriately with growth brought about by greenfield housing developments in the local area:

- Pukekohe Outer ring freight route improvements
- Waiuku Rd / Stuart Rd intersection improvements

It is considered that funding could be provided for the projects from the Greenfield Transport Infrastructure Project.

Appendix 2 – New Zealand Transport Agency Investment Program

Federated Farmers supports the Investment Programs listed, insofar as they apply to the southern rural area of Auckland:

- SH1 South, Papakura to Bombay

Appendix 3 – KiwiRail Capital Program

Federated Farmers supports the Capital Programs listed, insofar as they apply to the southern rural area of Auckland:

- Pukekohe to Papakura Electrification

Federated Farmers considers that the project needs to include new stations at Drury and Paerata, both with park and ride facilities. Provision should also be made for upgrading the Pukekohe Station and the parking facilities at Papakura Station.

The Federation

Federated Farmers of New Zealand is a primary sector organisation that represents the majority of the country's farming businesses. The Federation has a long and proud history of representing the interests of New Zealand's farming communities, primary producers, and agricultural exporters.

The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment
- Our members' families and their staff have access to services essential to the needs of the rural community
- Our members adopt responsible management and environmental practices.

The total agricultural sector is even more important to the economy than it was fifteen years ago. Its contribution to the New Zealand economy has risen from around 14.2 percent of GDP in 1986/87 to around 17 percent today (including downstream processing). Some authorities consider agriculture's current contribution to the New Zealand economy to be about 20 percent of GDP.

Federated Farmers looks forward to further consultation with the Auckland Council and Auckland Transport on the Proposals.



120 Church Street, Onehunga
Private Bag 92904, Onehunga
Auckland 1643, New Zealand
09 622 8355
louisa.jones@firstunion.org.nz

Submission on the Auckland Regional Land Transport Plan

Submission To: rltp@at.govt.nz

Submission From: First Union
Louisa Jones
Assistant General Secretary
Private Bag 92904
Onehunga
Auckland
Louisa.jones@firstunion.org.nz

Date: 11 May 2018

Executive Summary

There has been little thought to the working people who deliver the services described in the Regional Land Transport Plan (RLTP) This is indicative an ongoing and structural disconnect between Auckland Transport and the people who carry out its work. This disconnect is dangerous from a health and safety perspective, it is also unhealthy from a cultural perspective.

Auckland Transport is the Person in Control of a Business or Undertaking under the Health and Safety in Employment Act, the omission of bus driver safety within the report is another indicator of this culture that **values a company's bottom dollar or key performance targets over** the wellbeing of workers and the public.

The RLTP, together with the Auckland Transport Alignment Project (ATAP) present an exciting vision for the future of our city. That plan is only credible if it meets the needs of the working people who deliver the services, including bus drivers as well as the working people they carry.

FIRST Union represents around 600 bus drivers in Auckland.

- 1) Have we correctly identified the challenges facing Auckland?

The identification of safety as an issue within the plan is important, however employee safety is not specified anywhere in the document. FIRST Union has identified and raised to Auckland Transport a major risk to driver, passenger and community safety which is fatigue.

Driver fatigue as increased significantly since the adoption of the Public Transport Operating Model. Because the model held a 60% weighting for cost and 40% weighting

for other matters, bus operators with lower cost business models won the bus contracts in the recently tendered Auckland urban contracts.

The lower cost bus operators that overwhelmingly were awarded contracts overwhelmingly lacked provisions within their employment agreements for overtime penalty payments. This is a significant divergence from what had previously been standard within the urban contracted operators.

With penalty payments for overtime gone, Schedulers were no longer incentivised to minimise hours of work to as close as possible to 40 hours per week. With flat rates only paid, drivers have noticed a huge increase in rostered hours. Many drivers are regularly rostered to work 50 hours per week. This coupled with excessive down time between morning and afternoon shifts known as the 'book off' has led to significant and dangerous fatigue.

The minimisation of fatigue caused by Auckland Transport's own operating model has not been addressed within RLTP and should be.

FIRST Union thinks it can be best addressed by Auckland Transport meeting together with the FIRST Union and the operators involved and agreeing hours of work limitations including overtime penalty payments for drivers as well as other matters.

2) Have we allocated available funding to the highest priorities?

No funding has been allocated to addressing the issue described in the previous question. The increased operating budget of Auckland Transport could be streamed into compensating the extra costs to operators associated with implementing overtime penalty payments into employment agreements.

FIRST Union highlights the importance of ensuring the proposed operating revenue and expenditure for Auckland Transport makes provision for maintaining and improving the wages and conditions of bus drivers. It should also allow for the **possibility of initiatives such as the living wage and a future 'fair pay' agreement** are provided for in Auckland Transport contracts with operators.

In order to retain experienced drivers Auckland Transport contracts should also provide for a mechanism for the maintenance of wages and conditions between bus operators when a route is to be taken over by a new operator. We note that the two largest operators in Auckland, Go Bus and NZ Bus have publicly supported the concept of a negotiated bus standard for drivers.

3) Have we excluded any projects or activities from the proposed transport programme that should be included?

The implementation of a committee to agree hours of work as suggested above. The committee could address other possible initiatives including future of work considerations and driver training.

[Ends]

Getting Auckland moving:

Infrastructure: Why bother?

What we decide to do and to pay for now will get action in the next few months and years and then will be there for generations to come. That's the thing about infrastructure: if you do it well it lasts and serves really well. If you only kind of make it, you might save a bit of money then but have to come and fix it up again and again.

If you decide not to make the infrastructure, you are actually taking away something from future generations as well as from the present. This transport consultation for the Regional Land Transport Plan RLTP is our time and chance to provide: let's use it.

Resourcing

Resourcing for the transport changes are needed. The more you drive the more you pay is generally a fair principle, providing there are non-driving choices. Congestion charging may be even fairer and should be expedited.

For the present, the amount proposed to be charged seems appropriate. I would have supported keeping the transport levy on rates as well. Given the government has foreshadowed increasing fuel excise as well, there will need to be careful assessment of how the regional excise impacts on low income families. Council could implement a strategy to mitigate any adverse impacts.

Frequent Transport Network

In South Auckland we have seen a massive change in transport patterns with the 2015 introduction of a new passenger rail service with more frequent electric trains. The patronage numbers have grown hugely. Lots more choices and combinations like bike and train have become available with the electric trains. It is a fairly reliable and frequent service. It would be great if there was more investment in the infrastructure such as extra lines and grade separated crossings. A similar usage surge is well underway with the northern busway in Auckland. These kind of projects make a transformational difference and should be supported.

Clendon area has a large and growing population of people who do not have access to a car and need more frequent public transport service.

Please investigate how to extend Frequent Transport Network to Clendon and provide high frequency link to trains etc. For example could FTN use Mahia Road and interchange with Te Mahia train Station and Great South Road buses.

Shuttle buses:

High frequency smaller shuttle buses to provide access to the trains and arterial road Frequent Transport network.

Local buses

Where I live, we have a bus service of one per hour most of the day outside peak. It is too infrequent to be generally useable. This undermines other possible choices and people just use cars. Auckland Transport reviews the numbers using the bus and say patronage is too low to warrant a more frequent service. So this is a destructive circle where the goals of more choice are undermined.

To address this kind of impasse, I advocate for an additional explicit statement of **innovation** to be included in the RLTP. As a city, we need to be trying various options to see what can work. Whether that might be use of phone applications or car pooling options or shared taxis or shuttle vans or something else. Auckland Transport needs to be required to open up to try things. Its ok if somethings don't work. Together we will find what can break the apparent stalemate which exists in many less densely populated areas.

Disability Access to public transport

An access audit for public transport facilities. Is it viable and safe for people in a wheelchair, people who are blind and others with disability to get to and from train station platforms, bus stops etc. Resourcing for the audit and for work identified.

For example, I met a man using his wheelchair-cycle for his trip from Wattle Downs to work near the city. To commute, he clips his wheelchair to a cycle frame which incorporates an electric motor. It becomes a reliable three wheel cycle. However, he can't get onto nearest train station, Te Mahia, in the morning because the last part of station approach from Great South Rd is too steep. Instead he rides to Manurewa Train Station to get access to trains. He gets off at Newmarket and cycles up Carlton Gore Road on his way to work. Returning in the evening he cycles to Newmarket, trains to Te Mahia and then rides home from Te Mahi station. He enjoys the exercise and the fresh air after being indoors at his work all day.

Please can AT redesign access way onto Te Mahia to make the station truly wheel chair accessible. At the same time the access from Great South Road needs to be wider with unrestricted visibility onto the station. This needs to be planned before station gates are installed.

Network capability improvements

Network capacity improvements can include effective measures to incentivise employers to arrange flexibility so staff are not required to travel to work at peak times. Eg work from home, core hours etc

Council should commission development of a tool for evaluating whether the actions of organisations are contributing to transport access or inhibiting it. For example, Auckland Council itself is, for the stated purposes of their efficiencies, requiring staff to travel in to more

centralised work locations in CBD rather than remain in dispersed 'service centres' around the Auckland district. These moves are creating a huge amount of extra travel for staff and inhibiting access. A comprehensive transport strategy would require any large organisation to test and report on any restructure to make transparent the impact on travel times and access of proposed relocations.

Improve traffic light sensors!

Environment

Environmental health requires huge changes in our travelling behaviour. What we start now will make enormous differences to future generations. We will build and live in a denser city and we need to set up the transport network very well for this new stage in our city. Our impact on the environment matters - it is our only home.

Public Health

Public health needs to be properly supported in our transport planning. Let's make it safe and comfortable for people to walk and cycle where we can. More activity will keep us healthier reduce our burden of ill-health and save enormous costs in our health system.

Walking/Cycling

Continue to expand cycle network so it becomes all off road or separated by physical barriers from cars. My middle aged neighbour has been knocked off her bike 3 times on the way to work and now drives even though its not far.

Build Skypath and support NZTA Seapath with useful connections.

Please plan and fund pedestrian and cycle bridge across Papakura stream between the mouth and Gairloch Place in Mahia Park so people can easily have flat access to seaside of Wattle Downs peninsula from Takanini and Great South Road and train line without use of a car. This Proposal fulfils an existing aim in Manurewa Takanini Papakura Spatial Plan.

Please upgrade and strengthen footpath along Mahia Road southern side between Holmes Road and Great South Road.

Continue diverse initiatives and programmes which promote walking and other active transport forms.

Roads

No matter how many major roads we build, roads alone will not solve congestion at times of peak use more than just for a few months. In Auckland we are already being greatly affected by

people who drive commuting longer distances diverting onto smaller more local roads creating congestion and clogging up more people's lives.

Goods and services like tradespeople use roads and require a better priority and better traffic flow.

Arterial roads are too congested for too long. Review of priorities of road usage, especially for arterial roads like Great South Road.

Please implement parking strategy and remove parking on arterial roads. Instead arrange for easier movement of vehicles and reduce congestion problems.

Please commission an Independent Review of central line hatching marking experiment on arterial roads like Great South Road. This hatching can make roads more dangerous not less and contributes to congestion.

Local Roads

Hill Road Manurewa is carrying a lot more traffic including large numbers of quarry trucks. The roundabout at the intersection of Stratford Road and Hill Road needs to be greatly strengthened to prevent the currently frequent development of potholes.

Safety

Continue to eliminate unsafe parts of the network. Create grade separated rail crossings in Takanini and other high usage areas.

Future Proofing

Please protect corridors for future provision for transport crossing under/over the Manukau Harbour between Weymouth and Karaka and 2nd crossing of Waitemata Harbour and similar projects.

Please progress Mahia Road to Rangī Road connection. Initial step is no parking at any time on Mahia Road anywhere near Great South Road intersection. This will improve traffic flow.

Conclusion

In broad terms, I support the proposals and funding plan. Please expedite the work.

14 May 2018

Draft Auckland Regional Land Transport Plan 2018-2028
Auckland Council
via email: rltp@at.govt.nz

Feedback on the Draft Auckland Regional Land Transport Plan 2018-2028: Goodman

1. Goodman Property Trust ("Goodman") appreciates the opportunity to provide feedback on the Draft Auckland Regional Land Transport Plan 2018-2028 ("ARLTP").
2. Goodman delivers industrial and commercial development throughout the Auckland region. The property portfolio includes industrial land at Penrose, Henderson and Mangere; the Central Park Corporate Centre in Greenlane; Business Parks at Highbrook (East Tamaki) and Manukau; and the VXV Precinct on the corner of Halsey and Gaunt Streets, Wynyard Quarter.
3. Goodman supports long term strategic spatial planning and allocation of infrastructure funding to provide clear guidance to the development sector as to areas of planned future business growth. This will enable the public and private sectors to achieve synergies in delivering business developments to support the economic growth of the region, and to provide employment opportunities for residents in growth areas.
4. Having reviewed the range of projects listed in Appendices 1-3 in the ARLTP, Goodman requests that the currently unfunded **East West Link (revised)** project be given funding priority. It is noted that an indicative cost of \$800m has been specified for this project.
5. Goodman considers that there has been a general underfunding of transport infrastructure in the Auckland region for many decades and that this underfunding has a significant impact on productivity. Whilst it is noted that the ARLTP seeks to allocate funding toward some roading projects, and public transport and walking and cycling initiatives, it is noted that relatively little funding has been allocated toward supporting business growth. In particular, Goodman is concerned that relatively little funding has been allocated toward the movement of freight, notwithstanding the plan recognises that congestion relating to the movement of freight is a significant issue facing the region.
6. Goodman considers that the East West link is an important project in terms of creating capacity and reducing congestion for those industrial areas from Mt Wellington through to Onehunga and Penrose as well as providing better connectivity for freight moving across the southern part of the city and to the airport.
7. Goodman understands that it is not intended that hearings be held with respect to the ARLTP, however, if this were to change, they would wish to be heard.

A handwritten signature in blue ink, appearing to read "James Spence".

James Spence
Director - Investment Management, GMT
14 May 2018

Greater Auckland's Submission on the 2018 draft Regional Land Transport Plan

1. *About Greater Auckland:*

Greater Auckland is an independent volunteer-run analysis and advocacy platform for improving the quality of our cities. We provide evidence based debate on urban form, transport, housing, design, and public space. Our aim is to foster a greater Auckland for all.

2. *Summary:*

Greater Auckland generally supports the 2018 draft Regional Land Transport Plan (the RLTP). The RLTP reflects the Auckland Transport Alignment Project, which we consider is an excellent 10 year transport programme for Auckland.

While we generally support the RLTP, we request the following amendments:

- Highlighting "poor travel choice" as a key challenge facing Auckland. This would align the RLTP with the GPS, ATAP and the Auckland Plan.
- A clearer explanation of the RLTP's objectives, policies and land transport priorities (as distinct from the particular projects in the document's appendices). As well as ensuring the RLTP meets its statutory requirements, this would make the document's "strategy" much easier for the public to understand.
- Clarity on what the priorities will be for the first three years and an assurance that these will address the most critical transport issues (e.g. Auckland's road safety crisis).
- Updating funding and expenditure information to align with ATAP and the GPS (e.g. rail funding now generally comes through the National Land Transport Fund rather than from the Government directly).
- Additional funding for cycling to reflect the excellent value for money from this investment and its broad range of benefits. The RLTP appears to be misaligned with ATAP by not including additional cycling funding as a priority for additional funding.

These changes will help ensure the RLTP is an easier and clearer document to read and follow and properly reflects ATAP, the Government Policy Statement (GPS) and the Auckland Plan.

The remainder of this submission provides more detail on our suggested changes to the draft document.

3. *Section 3 - Challenges*

While the main transport challenges facing Auckland are described in this section, we generally consider it could be structured in a way that is much easier to follow and is more logical and connected to the GPS, ATAP and the Auckland Plan.

In particular, we request the following changes:

- The key challenges should be listed at the start of the section. This would make the whole section easier to follow and ensure the RLTP aligns with the GPS and ATAP. We suggest the following challenges (in order):
 - Fixing Auckland's road safety crisis
 - Improving travel choice
 - Improving access and addressing congestion

- Reducing environmental impacts
- Supporting Auckland's growth
- Achieving value for money
- Remove the graph and text relating to car registrations. Most vehicles entering New Zealand are registered in Auckland and therefore this data does not really provide an insight into Auckland's transport challenges. Furthermore, new car registrations appear to be only a small proportion of total vehicle imports making this data even more misleading.
- The text at the bottom of page 14 appears out of place and could be read as "the vehicle growth provides opportunities to improve prosperity...". This is incorrect as growth in private vehicle travel only creates congestion, emissions and a variety of other problems.
- The safety section should cut to the chase and call out that Auckland faces a road safety crisis. It also needs to provide some further information about where the high-risk areas are, what parts of Auckland are seeing the most significant problems, how Auckland is comparing against other cities. This section really needs to "set up" where the focus of effort is going to be to address Auckland's road safety crisis.
- The accessibility, congestion and freight sections are incredibly long and disjointed with repetitious information (two sub-sections on access?) These should be significantly shortened and be much more focused on the key direction given by the GPS and ATAP.
- There should be a new transport challenge that focuses on improving travel choice. This is discussed at length in the GPS, ATAP and the Auckland Plan. Much of the text relating to public transport, walking and cycling on pages 24-26 would better fit under this heading.

4. Section 4 - Addressing Auckland's Challenges

Like the previous section, this would also benefit from a clearer summary at its start and a key list of the key components of the strategic approach to addressing Auckland's challenges. This should be structured around the legislative requirements that the RLTP identify objectives, policies and land transport priorities.

In general, there is quite a bit of repetition between sections 3 and 4 that should be removed. Section four should really be much more about detailing the actions that will be undertaken to address the challenges, rather than simply restating why a particular issue is important. The current sub-sections within section 4 feel like arbitrary distinctions (e.g. why is rail not part of rapid transit, why is rapid transit discussed in access rather than rapid transit etc.) and need to be changed to make sense and to align with the GPS and ATAP.

We suggest the "policies/priorities" that this section should be structured around should be based on ATAP, using the following headings:

- Expanding Auckland's rapid transit network
- Making targeted improvements to the road network
- Enabling greenfield growth
- Delivering dedicated safety programmes
- Building safe and attractive walking and cycling facilities
- Continuing to improve bus and ferry networks
- Maximising the benefits of technology and optimising existing networks
- Looking after existing assets

Much of the current text could be reworking into these sub-sections. Other requested changes are:

- The safety section needs to be clear that safety is not a negotiable transport outcome and cannot be traded off against other outcomes or compromised through public consultation processes.
- The text on cycling should draw from the Cycling Programme Business Case more and describe the approach to cycling investment (area focused rather than scattered improvements) and the priority areas.
- The "meeting the needs of visitors to Auckland" section appears very out of place and would probably better sit in section 3.

Sections 5 and 6 should be integrated into section 4 as these both form critical parts of the overall strategy for addressing transport challenges.

5. Section 8 - Funding and Expenditure

Some changes to this section are required to ensure it reflects the GPS, in particular rail funding is proposed to come from the National Land Transport Fund through its Transitional Rail activity class.

This section also needs to detail what the key investment priorities in the first three years will be. It is important that the direction of ATAP and the GPS is given effect to in the first three years and there is not "business as usual" during this time. There needs to be a particularly strong focus on safety (including safe infrastructure for vulnerable road users like those walking or cycling) in the first three years to end Auckland's road safety crisis.

6. Appendices - Details of Funded and Unfunded Investments

We request the following changes to the appendices that detail the proposed investments at a project or programme level.

- Reallocate the \$62m "Regional Improvement Projects" line item elsewhere (a larger funded cycling programme) or provide greater clarity around what this will be used for. It appears to be a "slush fund" for projects that may not give effect to the overall strategy.
- Review the "Carrington Road improvements" project to ensure it responds to the latest government housing plans, which are much more significant than 1,400 homes.
- Add further investment to the "walking and cycling programme" to give effect to the emphasis ATAP places on investing in cycling and to Auckland Transport's recently adopted 10-year Programme Business Case (PBC) for cycling. The PBC calls for over \$600 million in investment however it appears only \$338 million is allocated towards it in the RLTP and nothing in the unfunded project list. If this is not possible within the funded levels, then the list of unfunded projects needs to include a larger cycling programme to align with the PBC and ATAP, which recommends "...as further funding becomes available, stronger consideration be given to increasing the cycling programme".



**Greater East Tamaki
Business Association Inc.**

14 May 2018

Auckland Regional Transport Committee
Auckland Council
Private Bag 92300
Auckland 1142

rltp@at.govt.nz

Submission to Proposed Regional Fuel Tax and Draft Auckland Regional Land Transport Plan 2018-2028

Introduction

The Greater East Tamaki Business Association Inc. (GETBA) welcomes the opportunity to make this submission. GETBA is the Business Improvement District business association for the greater East Tamaki business precinct including the world-class Highbrook Business Park. GETBA advocates for business and property owners in the area's economic development; provides a conduit to business support, education, resources and networking; enhances the safety and security of the area; and promotes the precinct as a great place to do business and work.

The East Tamaki business precinct is situated in a key strategic location with links to the airport, port, CBD and other business areas within the region. The precinct has developed from greenfield origins and the availability and relative cost of land has, in the past, made the precinct attractive to businesses. As such, the area has a number of nationally and internationally significant companies, some of which are involved in developing innovative technologies. It is a dynamic and highly successful production and export zone, contributing \$3 billion to the New Zealand economy and 19 million in rates each year.

As a manufacturing and distribution hub there are frequent movements of freight in and out of this business precinct. Most commuters to East Tamaki drive alone in their cars, with some driving with passengers, but very few choose public transport (as there are few options) and active modes are restricted by the nature of the roads and types of traffic.

Consequently, transport issues (especially congestion) are a significant impediment to East Tamaki businesses' ability to attract and retain staff, and to productivity. Improved roading and transport is required to enable more efficient movement of freight and people in and out of the area and to address productivity losses.

Feedback

Question 1. Draft Regional Fuel Tax Proposal

We agree that rapid population growth in Auckland has brought challenges, including increased congestion, and reduced accessibility. We also accept that we are not going to address this problem simply by building more roads. Demand management of our existing network must be a key solution, especially creating priority for freight and delivery movements.

We recognise the need to raise more funding for transport projects and services, however we have concerns that the proposed Regional Fuel Tax will not raise sufficient funds or effect sustainable behaviour change. We therefore see it as an interim funding tool until central government enables the introduction of congestion charging initiatives that both manage demand and raise funds equitably as soon as possible, balanced with investment into affordable and more frequent public transport to effect sustainable behavioural change.

We are also concerned that the previously unannounced additional 9-12 cent per litre national fuel tax (to be brought in over the next three years), on top of the RFT will place a further unexpected financial burden on business. This is likely to cause a supply chain knock-on effect that may deliver unintended inflationary consequences such as price rises on consumer goods and services.

A less costly option could be to continue the Interim Transport Levy (ITL) until a more permanent alternative road pricing mechanism is put in place. The ITL is \$114 per household or per business, while the Automobile Association has estimated the average commuter will pay \$135 a year under a RFT.

We previously noted it is essential that the regional tax is hypothecated to spending on specific transport projects and services in Auckland and be reported on with complete detail and transparency. We are pleased to see that the Draft RFT Proposal Document identifies the specific transport projects and services that the proposed regional fuel tax will be spent on and ask that this transparency also be more clearly reflected in the final Regional Land Transport Plan.

Question 2. Regional Fuel Tax Projects

We feel road corridor improvements together with enhancing network capacity are priorities in order to make better use of the existing transport network travel to increase the number of people who can travel through key routes and corridors and decrease travel times.

Project 12: Road Corridor Improvements

We are very pleased to see a key congestion hotspot in the East Tamaki business precinct - Smales/Allens intersection upgrade and road widening - included as one of Project 12: Road Corridor Improvements. Your Draft RFT Proposal Document on page 17 acknowledges that this upgrade will *“have benefits for freight movements and other business-related traffic”* and states *“The project has a very high Benefit Cost Ratio (BCR) as it delivers sizeable travel time benefits for a relatively small level of investment.”* We therefore feel this makes a case for the Smales/Allens intersection upgrade and road widening to be prioritised for implementation within the first three years of the decade.

Project 4: AMETI Eastern Busway

We appreciate the acceleration of AMETI stages 2, 3 and 4 with Stage 4 completed by 2025. We particularly note in the Draft RFT Proposal Document on page 9 that *“the project recognises that some key congestion points along the primary vehicle routes still need to be unlocked via targeted road improvements or new connection”*. This will be true of some of the intersections (and related roads) along Ti Rakau Drive between Gossamer Drive and Botany.

Project 3: Improving Airport Access

We welcome the proposal for improved public transport to the airport from East Auckland by 2020/21.

Question 3. Regional Land Transport Plan

In response to your question regarding whether you have identified the most important transport challenges facing Auckland, while we agree overall with the challenges you have identified (safety, congestion, decreases in accessibility, impact on the environment and supporting growth), as you also note, improving network capacity and performance by making the most of the existing transport system is key.

You have properly said that this must focus on optimising the transport network through targeted changes, such as improving the efficiency and coordination of traffic lights, the use of dynamic lanes at peak times, giving priority to freight movements on key freight connections and removing bottlenecks to mitigate congestion. Maximising the benefits from new technology and taking opportunities to influence travel demand are also important, as well as introducing pricing to address congestion as soon as possible.

NZTA Programme – East West Link (revised)

We are pleased to see a revised East West Link included in the Appendix of the RLTP. Our key message regarding this crucial piece of work, is that the East must be included as originally envisaged. It is vitally important that the debilitating congestion impacting the movement of freight and business productivity be addressed as **originally intended** – that is as a key initiative to improve freight access to key freight destinations encompassing the Airport, Onehunga, Penrose **and East Tamaki**.

To date there is next to no detail on how this project is to be revised, so we are very keen to see more detail and look forward to being included in early consultation.

Question 4. Funding Activities

All seven of the areas listed are important but road corridor improvements and network capacity and performance are very important for the reasons identified above.

Conclusion

While we welcome the release of the Regional Land Transport Plan as well as the Auckland Transport Alignment Project Report and the greater clarity this now brings to funding requirements, expenditure and broad delivery timeframes for transport projects across Auckland, we would also like to see more detail on the precise timing and the relative priorities for both the funded and unfunded projects set out in the Plan.

Significant works are planned for the next decade. In the interests of the Auckland economy, it will be important that harmful disruption to businesses affected by construction is minimised and mitigated. We recommend a comprehensive strategic development plan be implemented so that any business disruption be identified, minimised and avoided where possible through careful project management and adequately funded initiatives be designed and actioned to remedy and mitigate any disruption that is unavoidable.

It is of utmost importance to us that early and clear channels of communication are established between the delivery agencies (such as Auckland Transport) and Business Associations as well as key stakeholders in those areas affected by the planned works to facilitate a smooth transition and efficient outcome for the projects.

Contact for submission:

Jane Tongatule

GETBA General Manager

gm@getba.org.nz

Ph 021 993 380



SUBMISSION ON AUCKLAND COUNCIL'S DRAFT REGIONAL FUEL TAX AND DRAFT REGIONAL LAND TRANSPORT PLAN

TO: AUCKLAND COUNCIL

SUBMISSION ON: DRAFT REGIONAL FUEL TAX AND DRAFT REGIONAL LAND TRANSPORT PLAN

NAME: HORTICULTURE NEW ZEALAND

POSTAL ADDRESS: PO BOX 10 232
WELLINGTON

1. Horticulture New Zealand's (Horticulture NZ) submits generally in support of the Draft Regional Fuel Tax (RFT) and Draft Regional Land Transport Plan (RLTP)

2. Background to HortNZ:

Horticulture New Zealand was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.

The horticulture industry value is \$5.6 billion and is broken down as follows:

Industry value		\$5.6bn
Fruit exports	\$2.81bn	
Vegetable exports	\$615m	
Total exports		\$3.4bn
Fruit domestic	\$960m	
Vegetable domestic	\$1.26bn	
Total domestic		\$2.2bn

The benefits associated with horticultural production extend beyond the economic. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

With New Zealand's increasing population, domestic food supply is an issue that HortNZ is concerned about nationally. HortNZ have recently released a report¹ on domestic vegetable production in New Zealand to help educate and inform New Zealanders of this issue.

While the ability to transport chilled fruit and vegetables has reduced reliance on locally-grown produce, it also creates risk if distribution channels are unexpectedly altered. For example, a blocked highway from congestion or significant rainfall could restrict access between fruit and vegetable hubs and their markets. Therefore, HortNZ consider planning for reliable and efficient Transport networks to be a high priority.

3. Horticulture in Auckland

Auckland is critical to New Zealand's food supply, producing a significant proportion of the nation's onions, tomatoes and potatoes. In 2016, Auckland produced for regional and national supply:¹

- 39% of New Zealand's tomatoes
- 33% of New Zealand's cabbages
- 32% of New Zealand's lettuce
- 25% of New Zealand's broccoli and cauliflower
- 19% of New Zealand's potatoes.

Pukekohe contains most of Auckland's versatile land for production. There are a number contributing factors to this versatility including high quality soil, water, frost free climate, shelter, access to labour, transport and markets.

The north facing, frost free areas of Pukekohe provide a productive advantage which supports year-round vegetable production. Because of this, Pukekohe is the sole supplier to the rest of New Zealand for certain vegetables (such as potatoes and lettuce) throughout the year.

There are also a number of fruit growers in South Auckland and a number of large glasshouse operations and organic fruit orchards in the north and north-west of Auckland.

4. Comments relating to the draft RFT and RLTP feedback form:

Question 1: The proposed RFT

HortNZ generally supports the:

- use of pricing mechanisms to provide the necessary infrastructure to address Auckland's traffic issues.
- proposed 11.5 cents (including GST) per litre, subject to exemption of on-farm horticultural vehicles and machines.
- Councils advocacy to government on rebates for petrol and diesel purchased for off-road purposes.

We have lodged a submission on the Land Transport Management (Regional Fuel Tax) Amendment Bill (RFT Bill). A copy of that submission is attached and is considered to form part of this submission.

Key matters raised in that submission include:

¹ New Zealand domestic vegetable production: the growing story. Horticulture New Zealand, 2017.

- HortNZ queries whether a regional fuel tax (RFT) is the most equitable or effective approach. We suggest a range of mechanisms should be investigated and applied. This could include tolling of existing and new roads, and the use of technology such as electronic Road User Charges (RUC).
- HortNZ would oppose the RFT Bill should on-farm horticultural machinery and vehicles not be exempt. We recommend that exemptions should be based on the existing rebate mechanism used for RUC.
- HortNZ is concerned at the lack of clarity around the rebate process. Burdensome record keeping requirements are likely to result in significant administration costs. Administrative costs would be further escalated if on-farm horticultural machinery and vehicles are not exempt.

Question 2: RFT priority projects

The top funding priorities from a HortNZ perspective are as follows:

- *Project 8: Road safety*

HortNZ supports the recognition given to addressing safety issues, particularly on rural roads. Urban traffic travels at high speed on rural roads more commonly used by slower moving rural vehicles such as tractors. This results in unsafe road behaviour and raises safety issues for rural workers.

HortNZ encourages Auckland Transport to include local businesses and communities in determining appropriate traffic safety design. Increasingly around Pukekohe, traffic calming and control measures do not consider rural needs. For instance, the size and location of many roundabouts are hindering truck movements, not adequately target problem areas and simply adding to Auckland's overall traffic challenges.

- *Project 11: Mill Road Corridor*

HortNZ supports the prioritisation of this project. However, greater priority should be given to identifying and securing an alternative route for the southern portion. Particularly connecting Pukekohe and Drury to Manukau. This work is currently unfunded in the draft RLTP.

This is a critical route for Pukekohe based horticultural operations to connect to State Highway 1 (SH1) and to Manukau. Current congestion levels are already impacting truck movements on and off the route and causing significant time delays in the delivery of fresh fruit and vegetables to market.

One local horticultural business estimates congestion in this area results in a weekly \$10,000 loss. This business has had to impose a 15% congestion charge on their container operation. The issue is compounded by regular closure of the motorway at night for roadworks. The existing alternative route significantly increases time taken to reach the final destination.

Securing the southern portion of the Mill Road corridor aligns with the development strategy in the draft Auckland Plan 2050, the RLTP objectives and complements Project 14 of the RFT. It will achieve a range of strategic outcomes relating to:

- road safety
- improving freight movement,
- alleviating congestion

- being value for money
- ensuring the future growth areas of Pukekohe and Drury have adequate infrastructure prior to development.

- *Project 13: Network Capacity and Performance Improvements*

The implementation of freight priority on key freight connections is listed as a key initiative in the RFT. Freight movement is identified as a key challenge in the draft RLTP. However, neither plan provides detail on proposed initiatives or how key freight connections are identified.

HortNZ supports the intention of this initiative but is interested in understanding more detail to ascertain whether proposed initiatives are likely to be efficient and are targeted to key connections for horticulture.

HortNZ identifies the following as key freight connections for Auckland based horticulture industry:

- Pukekohe/Drury to SH1
- Pukekohe/Drury to Manukau
- Kingseat Road, Patumahoe
- Warkworth to Manukau
- Kumeu to Manukau.

- *Project 14: Growth related transport infrastructure*

HortNZ supports prioritising funding to growth areas, specifically Pukekohe, Drury, Paerata, Kumeu and Warkworth.

We believe that provision of arterial connections around Pukekohe should be prioritised. This would assist in diverting trucks from the town centre which would align with objectives around road safety, improving freight movement and alleviating congestion.

HortNZ identifies the following projects as contributing to this RFT project:

Question 3: Auckland's transport challenges

HortNZ supports the challenges identified in the draft RLTP including:

- Road safety
- Congestion
- Freight movements
- Accessibility
- Environment and sustainability of infrastructure

Question 4: RLTP funding areas:

HortNZ generally supports the overall funding areas and projects identified in the RLTP.

HortNZ believes the following listed unfunded projects should be given priority for funding.

These projects will contribute significantly in addressing a number of issues including road safety, improved freight movement and accessibility (being improved access around Auckland, and access to fresh, affordable food):

Pukekohe Outer ring freight route improvements

- The plans do not provide any detail on what this project entails. HortNZ would support an arterial connection linking Paerata to Tuakau via Heights Road – Gun Club Road – Patamahoe Road – Waiuku Road – Attwells Road.
- Some of Pukekohe's based horticultural operations generate over 200 vehicle movements per day. The increase of urban traffic moving at high speed on these rural roads poses significant safety issues. It also compounds congestion issues with conflict between urban, rural and freight traffic along these routes
- This project aligns with improving freight movements and addressing road safety. It would successfully remove truck movements through Pukekohe town centre.

Waiuku Rd/Stuart Rd intersection improvements

- Several large scale horticultural operations are located in this area. These operations distribute both nationally and internationally. Accordingly, this is a key freight point for the horticultural sector.
- The layout of the road and intersection obstructs visibility for vehicles turning into or out of Stuart Road and for vehicles travelling east along Waiuku Road.
- The proximity to Pukekohe residential areas has also compounded traffic and safety issues. For instance, increased urban traffic travelling at speed on an already unsafe road and new road designs that do not accommodate rural vehicle needs (including trucks) but there is no safe, direct alternative.

SH22 Drury to Pukekohe Safe System Enhancement

- HortNZ supports provision of safety measures along this route, particularly given the increase conflict between urban, rural and freight traffic. HortNZ notes that in allocating funding for this project, careful consideration should be had in balancing short-term, quick-fix safety measures, and long-term prevention safety measures such as providing an alternative route.

HortNZ supports those projects identified for funding in the New Zealand Transport Authority (NZTA) investment programme. Specifically, the following projects are key freight corridors for the horticultural sector:

- SH1 Puhoi to Warkworth
- Southern Corridor Improvements
- SH1 South, Papakura to Bombay improvements

Question 5: Additional projects

HortNZ believes the following projects align with the outcomes sought in the draft RFT and RLTP and should be prioritised for funding:

Mill Road Corridor, Southern section

- HortNZ supports funding to investigate an alternative route and for acquisition and construction of the route. Discussion on this is detailed above.

Mill Road, Bombay road safety improvements

- This intersection encounters large traffic volumes and a number of conflicts between traffic exiting SH1, traffic turning in and out of the services stations and truck movements from large-scale horticultural operations.
- On December 16th 2017, 25 vehicles were counted turning into private driveways within a 16 min interval i.e. less than 40 seconds apart on average. Queues to turn right coming out of the service centre are regularly 15-20 vehicles. At the busiest times, it has been observed that the service centre can have vehicles queued from the Mill Rd entry to the exit. Video footage of these events can be made available on request.
- This traffic not only results in significant delays to truck delivery, it also poses serious safety issues. The location of the service stations will continue to encourage high traffic volumes, which is likely to increase with urban development.
- Prioritising this area for road safety and traffic calming measures aligns with the objectives of the RFLTP and fits within the projects listed for RFT contribution.

Southern freight rail hub – freight initiative options:

- A long-term solution to improving freight movements and alleviating congestion could include development of a freight rail hub in the Franklin area. The majority of Auckland's horticultural export is destined for the Tauranga Port via being trucked to the Onehunga rail hub.
- The local horticultural industry is willing to be a party to conversations around freight initiatives as a significant contributor to freight movements.

Thank you for the opportunity to submit.

Lucy Deverall

**Environmental Policy Advisor – North Island
Horticulture New Zealand**

Dated: 14 May 2018

Address for service:

Horticulture New Zealand
PO Box 10-232 WELLINGTON
Mob: 027 582 6655
Email: lucy.deverall@hortnz.co.nz



PO Box 10232, The Terrace,
Wellington, 6143

Level 4, Co-operative Bank House

20 Ballance Street, Wellington, 6011

Phone: +64 4 472 3795

Fax: +64 4 471 2861

Web: www.hortnz.co.nz

Email: info@hortnz.co.nz

20 April 2018

SUBMISSION TO THE FINANCE AND EXPENDITURE SELECT COMMITTEE ON THE LAND TRANSPORT MANAGEMENT (REGIONAL FUEL TAX) AMENDMENT BILL

Submitter: Horticulture New Zealand Incorporated
Submitted by: Mike Chapman, Chief Executive
Contact Details: PO Box 10232, The Terrace, Wellington 6143, New Zealand
T: +64 4 472 3795
E: Mike.Chapman@hortnz.co.nz

HORTICULTURE IN NEW ZEALAND

1. Horticulture New Zealand (HortNZ) appreciates the opportunity to make a submission to the Finance and Expenditure Select Committee on the Land Transport Management (Regional Fuel Tax) Amendment Bill (the Bill). We wish to appear before the Committee to present our submission.
2. This submission is endorsed and supported by the following named organisations:
 - Onions New Zealand Inc.
 - Vegetables New Zealand Inc.
 - Process Vegetables New Zealand
 - Tomatoes New Zealand Inc.
 - New Zealand Apples and Pears Inc.
 - T&G Global Limited
 - Balle Bros Group Limited
3. There are 5,000 commercial fruit, vegetable and berryfruit growers in NZ who employ over 60,000 workers. The growers in the industry are mostly small to medium sized business with a few larger corporates in some sectors. Therefore changes in taxation can have a dramatic effect on the ability of these businesses to remain profitable and continue to

offer job opportunities to New Zealanders. Horticulture is a significant employer and a key factor in the maintenance of provincial New Zealand's cultural and social wellbeing.

THE BILL

4. We acknowledge and support the original intent of a Bill for a regional fuel tax (RFT) for Auckland, to fund the necessary Auckland transport infrastructure projects to “get Auckland moving”. In a media release¹, the Minister of Transport explained that:
 - a. The Land Transport Management (Regional Fuel Tax) Amendment Bill will enable Auckland Council to seek funding for specific transport-related projects. It would allow funds raised in Auckland to be spent only in Auckland.
 - b. Auckland is at a standstill and the Auckland Council understands the frustration of its ratepayers who are spending hours of their day stuck in traffic.
 - c. Auckland has gone through massive population growth in recent years and its current infrastructure can no longer support the city. Improving infrastructure in Auckland is vital for its businesses and its people for whom just getting to work, school and about their daily activities can be a struggle.
 - d. Solving Auckland's traffic gridlock is also important for the rest of New Zealand with congestion in the city between 2015 and 2017 estimated to have cost the economy between \$1.3 billion a year in lost productivity.
5. Auckland's clogged transport infrastructure adds significant cost to the distribution of fresh fruit and vegetables in the Auckland region, and getting Auckland moving is important for our sector, and for consumers. The delivery of perishable fresh produce via congested infrastructure adds significant cost to healthy eating for New Zealanders. Auckland's infrastructure is further burdened by the city sprawl, including into areas of national significance for the production of food. Auckland, and other cities, must acknowledge and address the transport infrastructure burden created by such sprawl.
6. This Bill does however broaden the scope from the Government's pre-election position, and the Minister's press release, to all regions, not just Auckland. This is a substantive change in expectation, and, if it were to become law, would remove the Parliamentary process from the approval for a RFT - in regions beyond Auckland. Giving the power to councils to consult as part of a broader long-term or annual plan does not give the opportunity for specific national consultation to ensure alignment of intent, process, and expectation, and diminishes the transparency vital to our democracy.
7. Horticulture operations will be affected by this Bill, with RFT paid on bulk fuel deliveries to horticultural operations. However, many horticultural fuel users are not users of transport infrastructure, and should be exempt, (a regional fuel tax acts as a proxy for road use – Ministry of Transport Regulatory Impact Statement [RIS] p.24). HortNZ has been in discussion with the Ministry of Transport regarding the in-principle approach to exemptions for non-road users, who would be subject to the RFT. It was agreed in-principle that such exemptions would apply to horticultural machinery, used primarily off-road. We acknowledge that some horticultural vehicles do use rural road infrastructure for movement between farms, however on-road fuel consumption as a proportion of total use is negligible, and exemption should be total.
8. The cashflow effect for some horticultural businesses, paying RFT then claiming rebates, will be extensive. One Auckland based horticultural business estimated total RFT liability could be in the region of \$200,000 per annum, with exempt rebates of approximately

¹ <https://www.beehive.govt.nz/release/regional-fuel-tax-auckland-step-closer>

\$50,000, and change in fuelling location likely to reduce RFT liability by approximately \$50,000.

9. The rebate process for exempt use where RFT has been paid must recognise there will be an additional burden on agricultural fuel users (and other like users). The requirements for record keeping are not described in the Bill, which creates uncertainty, and fear of extra burden.

Regulatory Impact Statement

10. The Ministry of Transport RIS sets out a number of issues which HortNZ considers worth further examination.

11. One aspect not specifically examined, although occasionally noted in the RIS is the use of pricing mechanisms to change road use behaviour. The RIS, and the preferred option of RFT, focus on the easiest and quickest option for revenue collection, not on using any mechanism to achieve two, mutually aligned, objectives: revenue collection, and change in infrastructure use to reduce congestion.

12. Tolling. The RIS includes consideration of the option for tolling existing roads:

Tolling can provide reasonable and proven pricing signals if it is used as a demand management tool toward the road pricing end of the spectrum. Variable tolls could be charged depending on the time of day, providing some pricing signals.

13. Tolling appears to be a logical option for achieving the same outcomes as RFT, with the added benefit of changing road use behaviour – clearly one of the inherent challenges for Auckland.

14. Technology. HortNZ notes also the possibilities of future options such as electronic Road User Charges (RUC) which enable flexible pricing mechanisms to change road use behaviour, and gather revenue to fund infrastructure.

15. HortNZ suggests that new technological options should be considered beyond the immediate term, and we therefore encourage the inclusion in this Bill of a specific time bound review of alternate options for the RFT. Our suggestion is for review within five years.

16. The RIS falls short on the analysis of compliance and administration cost, with the exception of fuel companies. The RIS does not identify off-road fuel users as affected by the administrative burden to seek rebate, and no monetised analysis was undertaken for this group, which includes New Zealand's food producers. HortNZ notes these costs could potentially be significant, and one large horticultural company advised HortNZ that it already finds the burden for claiming back RUC exemptions so high as to preclude them from doing so.

17. As noted below, the Bill does not provide certainty of the eligibility for exemption, nor the requirements for record keeping, and until this is provided HortNZ cannot make specific comment on the compliance and administration cost for fruit and vegetable growers. We note that in many cases such record keeping may require the adoption of new technology solutions, or adaptation of existing systems, all at the cost to food producers, and ultimately consumers. One large horticultural company has already advised HortNZ that their record keeping systems are not aligned with RFT, and the redesign would be significant and onerous.

18. We note that s.3.2. of the RIS specifically records some criteria for assessment of likely impacts, criteria which have not been addressed with sufficient certainty in this Bill for horticultural businesses:

Equity and fairness: The scheme should be fair. The burden of interventions differs across individuals and businesses depending on which bases and rates are

adopted. Assessment of both vertical equity (the relative position of those on different income levels or in different circumstances), horizontal equity (the consistent treatment of those at similar income levels, or similar circumstances) and spatial equity (areas and locations that benefit from the tax should pay the cost) is important.

Compliance and administration cost: The system should be as simple and low cost as possible for taxpayers to comply with and to administer.

19. HortNZ notes the RIS analysis of impacts is “worse than doing nothing/the status quo” for the impact categories of: compliance and administration cost; coherence; and speed of implementation. We consider most critically that insufficient regard has been given to the Equity and Fairness, and Compliance and Administration Cost, for horticultural producers. The RIS identifies costs down to the thousands of dollars for the Crown, but has no analysis of monetised, nor non-monetised, costs to off-road users, such as horticulturalists.

20. HortNZ also notes this RIS applies to Auckland only, and cannot therefore be considered a full analysis of the RFT benefits, risks and impacts, arising from this broadened Bill.

Exemption from RFT

21. HortNZ submits that those elements of the Bill, that are yet to be prescribed by order in Council, in particular eligibility for exempt use, create uncertainty for the horticulture industry and should be further prescribed to enable informed debate and contribution to the Bill’s development. Without certainty on exempt use in the RFT Bill for on-farm horticultural machinery and vehicles, Horticulture New Zealand would be opposed to this Bill.

22. HortNZ has proposed to the MoT that agricultural machinery, which is exempt from Road User Charges (RUC - the diesel fuel equivalent for Fuel Excise Duty), also be exempt from RFT, and we seek for this to be made clear in the primary legislation.

23. This Bill is appropriately proposing the rebate mechanism as already used for Fuel Excise Duty (FED) rebates, but FED exemptions have proven exceptionally confusing for agricultural vehicles. Exemption for non-road use should be based on the same exemption from RUC; would align in principle (i.e. diesel vehicles already considered exempt from road-use charges); is much clearer; and the list more easily understood for horticultural purposes: “A vehicle is exempt from paying road user charges if it belongs to a class of vehicles whose purpose or design means it is unsuitable for regular road use”. Specific inclusion in the Bill of such a description for exempt vehicles, would provide greater certainty to horticultural operations. The exemptions from RUC and FED are included in Appendices 1 and 2.

24. The opportunity for businesses to register for full and specific business exemption from RFT is unclear in the Bill. HortNZ seeks to confirm that horticulture businesses, where fuel use from on-farm storage would be entirely exempt from RFT, may register as an RFT exempt business, and invoicing from fuel companies would not include RFT.

Section 65A, Definitions:

25. Given the sizeable impact on horticultural off-road fuel users from the RFT, HortNZ is concerned that the Bill is not explicit in identifying such off-road use as exempt. Such use is to be prescribed in regulations, leaving our sector with uncertainty about whether their off-road use will be exempt from RFT. HortNZ submits that for agricultural machinery, the definitions should include the same exemptions as for RUC.

Section 65O, Liability to pay RFT:

26. Section 65O(2)(b) appears to leave open the possibility for horticultural businesses, where fuel use is only for RFT exempt purposes, to be able to register with the NZTA as an exempt fuel user, and therefore not be liable to pay RFT. HortNZ seeks clarification that this

sub clause applies to all possible exempt uses and users, not just those specifically prescribed in Clause 65A (a) – (d).

Section 65X, Process relating to RFT rebates:

27. HortNZ is concerned that this Bill does not adequately provide certainty on the record keeping requirements to support rebate claims.

28. Subpara 65X(1)(d) states that rebates must be “supported by any documentary evidence and any other information –

- (i) That is prescribed in the regulations made under this Act; or
- (ii) That the Agency reasonably requires.

HortNZ submits that this creates uncertainty as to the expectation of record keeping for horticultural operations exempt from RFT to support rebate claims. Experience suggests this creates the opportunity for the Agency to create burdensome record keeping requirements, in an effort to prevent RFT leakage.

29. HortNZ notes that many on-farm fuel tanks, where recording of fuel use to support rebate claims would be expected to take place, are:

- a. Often not under cover, and record keeping in wet conditions would be challenging
- b. often have no discharge measuring available
- c. and for many such on-farm vehicles, there is seldom a place for keeping paper records dry (e.g. on a tractor)

30. The range of horticultural operations likely to be subject to RFT but seeking rebates for exempt use is considerable; ranging from small bulk fuel supplies for single tractors, to large users fuelling utility vehicles, truck fleets, and large tractor/harvester fleets (>50 tractors). For the horticultural industry clear expectation, without undue burden, on the record keeping requirements is an absolute necessity.

31. HortNZ submits that a suitable de minimis be set under which a statutory declaration of exempt fuel use would be sufficient to support a rebate claim. We propose this is set around 2000 litres per month on a rolling average basis, per bulk fuel site. HortNZ considers this value reflects our analysis of the likely burden on small users to maintain full records and administer rebate claims (i.e. \$200 per month in staff wages, record keeping, and cashflow costs).

32. We also submit that penalising by 10%, those rebate applications made more three months after the last day of the period for which rebate is sought is not equitable given the threshold for many small businesses to execute rebates is not inconsiderable, and there is no economic loss to the regional council for late rebate claims. Those operations that consume fuel subject to the RFT, but would be exempt, and therefore eligible to a rebate will be subject to additional cost to record usage and seek such rebates, and should not therefore be penalised for delay in submitting rebate claims.

Section 65ZE, Regulations:

33. As previously noted, much of HortNZ's concern relates to uncertainties on exempt use and rebate claim records, which will be made in subsequent regulations, specifically:

- a. Sub-para (b); prescribing uses of fuel (other than use in a vehicle on a public road) that are exempt from regional fuel tax
- b. Sub-para (c); prescribing circumstances in which persons are entitled to an RFT rebate
- c. Sub-para (d); prescribing any information or other matter that must be provided to the Agency in support of an application for an RFT rebate

- d. Sub-para (e); prescribing accounts or records to be kept by any person for any purpose under this subpart
- e. Sub-para (f); prescribing an amount for purposes of s.65X(2)(b)

34. We again draw to the committee's attention the horticulture industry concern about uncertainty, about on-farm use not being specifically exempt, and concern about record keeping.

RFT Administration costs

35. HortNZ submits that any NZTA costs attributable to managing RFT rebates should be borne by the RFT scheme, not funded from other income sources, reflecting accurately the implementation and operational costs of the RFT.

CONCLUSION

36. Horticulture New Zealand generally supports the intention of this Bill, as originally proposed: for Auckland only, and to "get Auckland moving". We do not support RFT for all regions.

37. In our submission we draw attention to:

- a. Our in-principle discussions and agreement with MoT on exempt use for farm vehicles and machinery, noting such exempt use is not specifically identified in this Bill
- b. Our proposal for exemptions to align with those exemptions from Road User Charges
- c. Our concern about the burden and practicality of record keeping to support rebate claims, and the uncertainty of Agency expectations for our industry
- d. The real costs for the horticultural industry in record keeping and submission of rebate claims - likely to add to fresh food prices
- e. Our proposal for a de minimis value of fuel use, requiring only a statutory declaration for rebate claim
- f. The specific inclusion in the Bill of a review of new and improved options within five years.

38. Horticulture New Zealand does wish to appear before the committee to be heard, with oral evidence in support of this submission.



Mike Chapman
Chief Executive
Horticulture New Zealand

ENDS

Appendices:

1. Road User Charge Exemptions
2. Fuel Excise Duty Exemptions

APPENDIX ONE: ROAD USER CHARGE EXEMPTIONS

ROAD USER CHARGE EXEMPTIONS

Your vehicle may be exempt from road user charges (RUC) if:

- it is a light electric RUC vehicle (gross laden weight 3.5 tonnes or less) whose motive power is derived wholly or partly from an external source of electricity, or
- [it belongs to a class of vehicles whose purpose or design means it is unsuitable for regular road use](#), or
- [it is a light diesel vehicles \(3.5 tonnes or less\) that is used almost exclusively off-road for a certain purpose](#).

Vehicles unsuitable for regular road use

A vehicle is exempt from paying road user charges if it belongs to a class of vehicles whose purpose or design means it is unsuitable for regular road use.

Vehicles unsuitable for regular road use are listed below:

Description of vehicle type
A tractor – a motor vehicle (other than a traction engine) that is designed and constructed, and not merely adapted, for traction and powering implements
A traction engine
A forklift, telehandler or sidehandler
A self-propelled machine that is designed and constructed (not merely adapted) for the following specialist industrial purposes: aerodrome runway sweepers electrical substations filters for transformer oil log haulers that are stationary when hauling logs aero engine test benches
A self-propelled vehicle (other than a tractor) or towed vehicle that is designed and constructed for (not merely adapted) agricultural purposes, including: combine harvester maize harvester pea viner windrower

APPENDIX ONE: ROAD USER CHARGE EXEMPTIONS

Description of vehicle type
silage chopper hay balers hay rakes cultivation equipment silage wagons feed troughs but not including: a self-propelled or towed vehicle designed for spreading fertiliser if it is used on a road for the cartage of fertiliser a self-propelled vehicle designed as a weed sprayer built on a truck chassis
A trailer towed by a traction engine, a forklift, telehandler, sidehandler or self-propelled machine described above
A motor vehicle propelled and supported solely by self-laying tracks
All terrain vehicle
Aerodrome crash fire tenders used on road only in emergencies
Trailer scraper (not self-propelled)
Plant for servicing oil filled cables
Road rollers
Stone and gravel crushing and screening plant
Bulldozers and angle dozers
Front end loaders
Mobile pile drivers
Motor scrapers (self-propelled)
Self-propelled water carts that are always unladen on the road
Self-propelled trench diggers and excavators

APPENDIX ONE: ROAD USER CHARGE EXEMPTIONS

Description of vehicle type
Self-propelled vehicles that are always unladen on the road and that are designed exclusively for carrying earth or other bulk materials
Mobile cranes (excluding mobile vehicle recovery units, truck mounted cranes, and cranes to which a distance recording device is or could readily be fitted)
Motor graders
Cable jinkers
Post debarkers
Saw bench apparatus
Forestry chippers that are used exclusively in the operation or management of a forest
Sawing or shearing apparatus for tree cutting
Log haulers that are not self-propelled and are stationary when hauling logs
Log forwarders
Log processors

Light vehicles eligible for a RUC exemption

Light diesel vehicles (ie weigh less than 3.5 tonnes) that are used almost exclusively off-road for the following purposes may be eligible to be granted a permanent exemption from paying road user charges. The eligible purposes are:

- agricultural
- defence
- education
- forestry
- industrial
- medical
- search and rescue
- tourism.

The vehicle must meet the following criteria to retain the exemption:

APPENDIX ONE: ROAD USER CHARGE EXEMPTIONS

- ownership remains with the person who was granted the exemption, and
- the vehicle is driven almost exclusively off-road, and
- the vehicle is driven on public roads only within 10km of the boundary of the property where it's usually kept, and
- the vehicle has the exemption sticker displayed in the windscreen at all times.

If any of these criteria change, the exemption ceases and a new application must be made or a RUC licence must be purchased.

How to apply

You will need to make an [Application for RUC exemption under section 40 of the RUC Act 2012 \(RUC EX\)](#).

If your details have changed

If you already have a RUC exemption for an off-road light diesel vehicle, but your details have changed, you need to make an [Application to change details of RUC exemption \(RUC EC\)](#).

Vehicles exempt from registration and licensing

This factsheet explains the difference between vehicle registration and vehicle licensing, and the different situations when your vehicle could be exempt from registration, licensing and related fees.

Before you drive

Before you can drive a vehicle on the road, it must be registered and licensed (unless it's exempt from registration and licensing).

A vehicle must be registered first, before it can be licensed.

Vehicle registration

Registration is paying a one-off fee to add a vehicle's details to the motor vehicle register. When it's added to the register, we issue number plates for it.

Vehicle licensing

Vehicle licensing is paying a regular fee so that your vehicle is allowed to use the road. When you pay the fee, you get a licence label (showing the licence expiry date) which you must display on the vehicle.

Your vehicle licence is often referred to as your rego, but it isn't the same thing as registration.

What exemption means

If an exemption applies, that means certain law doesn't apply.

In some situations:

- your vehicle may not have to be registered or licensed
- your vehicle may have to be registered, but not licensed
- your vehicle may have to be registered and licensed, but you don't have to pay some of the registration and licensing fees or other levies.

Exemptions from registration and licensing

In some limited situations, you may use an unregistered vehicle on a road. An unregistered vehicle can't be licensed, which means in the two situations that follow, your vehicle doesn't have to be registered or licensed.

Using an unregistered vehicle on a private road

Your vehicle doesn't have to be registered if you only ever use it on a private road.

Private road means a road, place or arcade (eg a covered passage giving access to a number of shops) laid out or formed on private land by the owner of that land.

Using an unregistered vehicle on any other road

Using an unregistered vehicle on any road other than a private road is illegal.

However, if you're fined, you may have a defence. It's your responsibility to prove that you're entitled to use an unregistered vehicle in that situation.

You'll have a defence if the vehicle is:

- an official vehicle of a visiting military force
- being used on a road that's closed to vehicles by the road controlling authority (eg the council or the NZ Transport Agency)
- a motor vehicle normally propelled by mechanical power that is being temporarily towed (one time, not regularly) without the use of its own power
- a trailer attached to a tractor, traction engine, forklift or self-propelled machine that's designed for specialist industrial use*
- a trailer attached to a self-propelled machine that's designed for agricultural use*
- a trailer designed only for agricultural operations being used on a road only when:
 - going to or from a farm*, or
 - being inspected, serviced or repaired
- a trailer attached to an exempt vehicle as defined in the Land Transport Management (Apportionment and Refund of Excise Duty and Excise-Equivalent Duty) Regulations 2004
- an overseas visitor's vehicle.

An overseas visitor's vehicle is a vehicle that's registered overseas and will be in New Zealand usually for less than 12 months. Some may stay in New Zealand for up to 18 months with permission from the New Zealand Customs Service.

For more information about overseas visitors' vehicles, please see Factsheet 35 *Importing a vehicle temporarily*.

For the bullet points marked with an asterisk () above, you won't have a defence if the vehicle is a heavy trailer carrying goods, travelling at more than 40km/h.

Exemptions from licensing only

In some limited situations you may use a registered but unlicensed vehicle on a road. In the two situations that follow, you'll have a defence if you get a ticket for using an unlicensed vehicle.

APPENDIX TWO: FUEL EXCISE DUTY EXEMPTIONS

Taking a vehicle for inspection, servicing and repairs

Your vehicle doesn't have to have a current licence if you're driving it on the road only to get a warrant of fitness (WoF), certificate of fitness (CoF), servicing or repairs.

You must be taking it **directly** to an appropriate place where you'll be getting those services.

The vehicle must still be safe to be used on the road, even if it needs repairs in order to pass an inspection.

Using a vehicle to cross the road

You can also drive an unlicensed vehicle on the road only to cross the road.

Crossing the road doesn't mean you can drive down the road for any distance. You must be crossing in a direct line from one side of the road to the other.

Warning! Make sure your vehicle is correctly registered and licensed for the way it's used. Law enforcement agencies may prosecute you if you're caught with a vehicle that isn't registered for the correct road use.

Exemptions from fees and/or levies

There are two types of vehicles that don't have to pay certain fees or levies: Exempt Class A and Exempt Class B vehicles.

Exempt Class A vehicles

Exempt Class A vehicles have to be registered and licensed, but you don't have to pay the registration fee or the vehicle licence portion of the licensing fee.

You still have to pay for the other fees and levies included in the total licensing fee (eg the ACC levy and the fees for number plates and licence labels).

Exempt Class A vehicles are:

- a pedestrian-controlled goods service vehicle
- a motor vehicle propelled and supported solely by self-laying tracks
- an all-terrain vehicle
- a logging truck or logging trailer that is:
 - unladen (isn't carrying logs), and
 - only used on a road while being taken directly to an appropriate place for inspection, servicing or repair, or to get evidence of vehicle inspection
- any mobile machinery* used on roads only in road construction zones, in accordance with notices declaring those zones.

*Mobile machinery:

- means a motor vehicle designed and used primarily for earthmoving or constructing and maintaining roads, bridges, ditches, or buildings
- includes an off-road dump truck
- excludes any motor vehicle designed primarily for carrying passengers or goods, including those that have had machinery added onto them.

Exempt Class B vehicles

Exempt Class B vehicles don't have to pay some ACC levies or tax on the fuel they use (known as fuel excise duty or equivalent).

They include farm vehicles, mobile machinery and other miscellaneous types of vehicle. The following types of vehicles are Exempt Class B vehicles.

Exempt Class B - farm vehicles

- A motor vehicle (not a trailer):
 - designed for agricultural operations, and
 - used on a road only for agricultural operations, and
 - including mobile huts, galleys and similar motor vehicles used on a road only for those agricultural operations, and
 - not including a vehicle designed for carrying or spreading lime or fertiliser when it's used on the road to carry lime or fertiliser, or when it's used on the road as a weed sprayer on a truck chassis.
- A motor vehicle (not a trailer):
 - owned by a farmer, and
 - used on a road only for agricultural operations, and
 - only used on the road to go from one part of the farm to another part of the same farm, or from one farm to another farm owned or managed by the same person.
- A tractor or traction engine:
 - used on the road only for agricultural operations, or
 - used mainly for agricultural operations and otherwise only for road construction and maintenance.
- A tractor owned by a farmer, used on a road only for:
 - the owner's agricultural operations, and/or
 - carrying milk, cream or whey to or from a dairy factory, and/or
 - carrying any farm produce, implements, stock or other necessary farm items:
 - from one farm to another farm owned or managed by the same person, or
 - for a maximum round trip (there and back) of 21 kilometres of public highway.
- A tractor owned by an agricultural contractor, used on a road only for:
 - carrying farm implements for a maximum round trip (there and back) of 21 kilometres of public highway, or
 - towing a farm implement or farm machine.
- A tractor that:
 - is designed and used partly for loading lime or fertiliser into topdressing aircraft, and
 - is designed and used partly for pulling a trailer that is designed and used only for carrying aviation fuel in a permanently attached tank, for use in topdressing aircraft, and
 - isn't used for any other purpose, and
 - isn't taken on any round trip (there and back) of more than 21 kilometres of public highway.

APPENDIX TWO: FUEL EXCISE DUTY EXEMPTIONS

Exempt Class B - mobile machinery

Any vehicle (other than a tractor) with machinery permanently attached, designed to be used on the road for driving, carrying or propelling:

- airport runway sweepers
- electrical substations
- filters for transformer oil
- stationary log haulers
- aero engine test benches.

Exempt Class B - miscellaneous

- Self-propelled grass mowers used only for the upkeep of grounds (cemeteries, recreation or education grounds) or for cutting grass verges on roads.
- Mobile huts, galleys or similar vehicles used only for constructing or maintaining roads.
- Traction engines.
- Forklifts.
- Airport crash tenders (specially-designed fire engines used at airports) when only used on the road in emergencies.
- Vehicles used:
 - only for loading and unloading ships, including embarking and disembarking passengers, baggage, mail and other cargo
 - on a public highway only when unladen (not carrying anything) and going from one wharf to another wharf, or from its usual place of storage to a wharf.
- Tractors used by local authorities only for constructing, maintaining and mowing stopbanks and the banks of other watercourses (eg rivers, streams, drains and canals).
- Tractors used only for shunting railway rolling stock.
- Trailers being towed by any vehicle described in the Exempt Class B - mobile machinery and miscellaneous examples in this factsheet.

What agricultural operations means

We mention agricultural operations a number of times in our farm vehicle examples.

Agricultural operation is defined in the Land Transport Management (Apportionment and Refund of Excise Duty and Excise-Equivalent Duty) Regulations 2004.

Agricultural operation means any operation concerned directly with the management of a farm; and includes the transport on a road of the produce of a farm, farm implements, stock, or other requisites of any kind whatsoever for a farm, if they are transported:

- from a part of a farm to another part of the same farm or from a farm to another adjoining farm that is owned or managed by the same person, or

The information in this factsheet is a general guide only. It's not the source of the law and shouldn't be used in place of authoritative legal documents. Some factsheets are updated frequently and print versions can quickly become out of date. If the currency of the information you are reading is important, check the factsheet index on our website (www.nzta.govt.nz/factsheets) or call us on 0800 108 809.

- from a farm to another farm owned or managed by the same person if the motor vehicle carrying the goods is not taken during any one trip along more than 21 kilometres of public highway in going from the owner's farm or other place of garage and in returning to that farm or place.

Exemptions from WoF and CoF

This factsheet doesn't focus on exemptions from getting a warrant of fitness (WoF) or certificate of fitness (CoF).

If you need more information on WoF, CoF and safety requirements, please check our website at www.nzta.govt.nz/vehicles/warrants-and-certificates or call us on 0800 108 809.

However, because parts of this factsheet do focus on agricultural vehicles, please note the following information about WoFs and CoFs for those vehicles:

- Agricultural vehicles that are operated at speeds of 40km/h or less don't have to have a WoF or CoF, but they must meet WoF standards.
- Agricultural vehicles that are operated at speeds of more than 40km/h must have a WoF.
- If your Exempt Class A or B vehicle isn't an agricultural vehicle, it must still have a WoF or CoF.

An agricultural vehicle is a vehicle that is designed, constructed or completely adapted for agricultural purposes, and includes an agricultural tractor and an agricultural trailer.

Cars, utes, vans, trucks and similar vehicles that are designed for general road use aren't agricultural vehicles.

Contact details

- Visit our website: www.nzta.govt.nz.
- Email us: info@nzta.govt.nz.
- Call us: 0800 108 809.
- Write to us: NZ Transport Agency, Private Bag 11777, Palmerston North 4442.

14 May 2018

Draft Auckland Regional Land Transport Plan 2018-2028
Auckland Council

via email: rftp@at.govt.nz

Feedback on the Draft Auckland Regional Land Transport Plan 2018-2028: Kiwi Property Group Ltd

1. Kiwi Property Group Limited ("Kiwi") appreciates the opportunity to provide feedback on the Draft Auckland Regional Land Transport Plan 2018-2028 ("the ARLTP").
2. Kiwi (NZX: KPG) is the largest listed property company on the New Zealand Stock Exchange and is a member of the S&P/NZX 15 Index. Kiwi has been around for more than 20 years and proudly owns and manages a \$3.1 billion portfolio of real estate nationwide, comprising some of New Zealand's best shopping centres and prime office buildings. In Auckland assets include:
 - a. The Vero Building, CBD;
 - b. ASB North Wharf, Wynyard Quarter;
 - c. Sylvia Park Shopping Centre, Mt Wellington;
 - d. Sylvia Park Lifestyle, large format shopping centre, Mt Wellington;
 - e. LynnMall Shopping Centre, New Lynn;
 - f. Westgate Lifestyle, large format retail centre, Westgate; and
3. 51ha of land at Drury which Kiwi intends to develop into a major centre, staged over the next 20 years to coincide with predicted population growth, household formation and employment growth in South Auckland. Kiwi has taken an active interest in strategic planning in the Auckland region in the past two decades. Recently this has included actively participating in the Auckland Unitary Plan process, as well as the Auckland Plan refresh that was consulted on earlier in the year.
4. Kiwi has been a long-time supporter of the City's quality compact growth model and its investment in the CBD and region's Metropolitan centres reflects this support. Kiwi recognises that supporting intensification in and around the region's centre is a particularly effective way in which land-use and transport planning can be integrated. By promoting growth around nodes, centres can be more efficiently serviced by the transport system, particularly public transport.
5. Kiwi considers that the ARLTP is a bold and appropriate strategy – not only in terms of the scale of the \$28b investment proposed but also in the breadth of projects proposed to be funded. In Kiwi's view the document inherently recognises that the region cannot solely build roads to relieve congestion. A wider view of the transport system needs to be taken to achieve a multi-modal network that improves accessibility for the diverse transport needs for all Aucklanders. Kiwi supports further prudent investment in the roading network but is particularly supportive of the additional funding that is proposed to be made available for public transport projects, active modes, safety, and technology initiatives.



6. Kiwi supports the general direction of the ARLTP and provides the following specific feedback on funding priorities as follows:

CBD & Region-Wide Projects

7. Kiwi has two significant office buildings located within the CBD and has long-recognised that private vehicle access into the central area is constrained by the limited ability to increase the capacity of the roading network. Future growth of the CBD is therefore dependent on moving people by public transport or by active modes. To that end, Kiwi particularly supports the following projects:
 - a. Downtown bus improvements (\$39m);
 - b. Downtown Ferry Basin Piers 3 & 4 (\$17m);
 - c. City Centre bus improvements (\$117m);
 - d. Wynyard Quarter integrated road programme (\$77m);
 - e. Additional EMU rolling stock and stabling (\$396m);
 - f. Downtown Ferry Basin redevelopment (\$57m);
 - g. Park and Ride Programme and enhanced programme (\$51m and \$119m); and
 - h. Light rail projects (\$1.8b)

Sylvia Park

8. In 2006, Kiwi developed Auckland's only privately funded railway station at Sylvia Park. It has been pleasing to see patronage of this station grow such that it is now one of the busiest stations on the network. Kiwi also developed a bus station as part of the original Sylvia Park development and is currently in discussions with Auckland Transport about upgrading this to a larger interchange as part of the wider AMETI project.
9. Kiwi supports the transport-related projects that will improve accessibility in and around the Sylvia Park Metropolitan Centre. Particular projects that are supported are:
 - a. Sylvia Park bus improvements (\$15m);
 - b. The suite of Eastern Busway projects, incorporating AMETI related projects (\$912m); and
 - c. East West Link revised (\$800m).

New Lynn

10. Kiwi acquired LynnMall in 2011, attracted in part by the significant investment that had been made in rail and bus infrastructure in the New Lynn Metropolitan Centre. Since acquiring LynnMall, Kiwi has invested in excess of \$50m dollars upgrading the asset, including the development of cinemas and the Brickworks dining lane which opened in 2015.
11. Kiwi supports the proposed Memorial Drive extension (\$8m) to provide additional connectivity and to support the development that is anticipated to the south of the Centre.



Drury

12. Kiwi has an interest in 51ha of land in Drury and has been working with Council and other landowners since 2017 to develop a structure plan for the area. Drury is identified as a significant growth node in the Auckland Plan for both residential and commercial activities. In the fullness of time, Kiwi anticipates developing its landholdings for a major centre.
13. The development of Drury for urban uses will require significant investment in new infrastructure, including substantial investment in transport projects. Having regard to this, Kiwi particularly supports the following projects associated with the southern part of the region:
 - a. Mill Road Corridor (\$507m);
 - b. Mill Road Southern - Alfriston to Drury South (\$669m);
 - c. FTN/RTN Manukau to Drury Upgrade (\$65);
 - d. Pukekohe to Papakura Electrification(\$202m);
 - e. Southern Rail Lines Upgrade for Regional Services/express services (\$800m);
 - f. Southern Rail Stations (\$78m);
 - g. Infrastructure works for Drury South – Ararimu (\$10m);
 - h. Southern Corridor Improvements(\$68m);
 - i. SH1 South - Papakura to Bombay (\$412m)
14. Kiwi notes that there is \$81m allocated to Supporting Growth - Investigation for Growth Projects to facilitate investigation for high priority projects in growth areas. There is no breakdown given but Kiwi considers that Drury should be given priority for this funding.
15. Kiwi understands that it is not intended that hearings be held with respect to the ARLTP, however, if this were to change, Kiwi would wish to be heard in support of this submission.

Yours sincerely

Ian Passau
General Manager, Development

ian.passau@kp.co.nz
+64 0 27 242 0678

04 May 2018

Auckland Council
Freeport Authority 182382
Private Bag 92 300
AUCKLAND 1142

By Email to: rntp@at.govt.nz

SUBMISSION ON THE AUCKLAND TRANSPORT Draft Regional Land Transport Plan

NAME OF SUBMITTER: KiwiRail Holdings Limited (KiwiRail)

ADDRESS FOR SERVICE: Level 1
Wellington Railway Station
PO Box 593
WELLINGTON 6140
Attention: Pam Butler

SUBMISSION:

KiwiRail Holdings Limited (KiwiRail) is the State-Owned Enterprise responsible for the management and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services throughout New Zealand.

KiwiRail wish to acknowledge Auckland Council and Auckland Transport (AT) for their extensive consideration of the role the rail network plays within the region, both in relation to passenger and freight movements, and as a vital part of the land transport network within the draft Regional Land Transport Plan (RLTP).

The comments KiwiRail have on the draft RLTP are provided below.

Provision for Rail Investments in the next decade

Key rail improvements in track and capacity are listed on page 36 of the RLTP. These items reflect the April 2018 Auckland Transport Alignment Project (ATAP) review and clearly have KiwiRail's support.

ATAP however, goes further across most modes and identifies what the priority would be if available funding was greater. KiwiRail thinks this is valuable information and should be identified in the RLTP for all modes; particularly for those items on the "cusp" of affordability. In the case of the rail network the item in question is the further capacity enhancements on the North Island Main Trunk (NIMT).

These items are referred to in;

- Appendix 3 KiwiRail Capital Programme – “Southern Rail Line Upgrade for Regional Services/Express Services \$800m;
- Inter-regional Services page 51
“Investment in Auckland’s rail network to meet forecast growth in metro and freight services, and provide for faster services in the south is a pre-requisite for the provision of comprehensive inter-regional services”
- Future Priorities page 20
“The most important of these future priorities is to continue to upgrade Auckland’s rail network, particularly so it can play a much greater role in meeting the current and future travel needs of the south, where substantial greenfield growth is planned and where public transport patronage has been historically low”

KiwiRail was part of ATAP and accepts that there is always a trade-off between the desirable and the affordable and there should be an appropriate balance between modes to get the best integrated transport outcome. As such we are not trying to re-litigate a decision taken through that process.

Although it is perhaps at a level below the RLTP we ask that all contributing agencies not close their minds to supporting the following items which currently, on the strictest interpretation, fall outside Decade 1 projects. Examples of these works are provided in Table 1 below.

Table 1: Project examples requiring integration of second decade projects and planning

Work package	Consideration requested
Papakura to Pukekohe Electrification (P2P) Page 36 and Appendix 3, line 5	P2P has currently been scoped and priced as electrification of the existing double track. The design for that work has considered where the third main would go, but there are no enabling works for the third main in the \$202m build package. As design develops and issues emerge we would ask for support for bringing forward some construction funding that is currently in decade 2 where we can demonstrate that constructing the formation and other civil earthworks in particular areas will be highly disruptive to services and/or materially more expensive if not done concurrently. An example of this could be the cutting immediately north of Pukekohe. <i>Note that the works required for the stations in this section (funded under the CIP) must be third track enabled.</i>

Work package	Consideration requested
<p>Wiri to Quay Park including the Junction (W2QP) Page 36 bullet point 4 and Appendix 3, line 10</p>	<p>W2QP is currently scoped and priced as creation of the 3rd Main, procurement of land for the 4th main and changes to Westfield but still retaining it as an at grade junction. The design for this work has taken into account where the fourth (4th) main would go, but apart from the station area at Middlemore there are no enabling works for the 4th main in the build package.</p> <p>As design develops and issues emerge we would ask for support for bringing forward some construction funding that is currently in decade 2 where we can demonstrate that;</p> <ul style="list-style-type: none"> • in the Otahuhu to Wiri section creating the formation, civil works (such as embankments in their final position for future 4th main) will be highly disruptive to services and/or materially more expensive if not done concurrently with 3rd Main works • around Puhinui (RLTP ref pg 39) any build for the interchange must accommodate 4th track therefore its likely there will be some decade 2 costs brought forward for this or, the scope of the Puhinui project expanded • in the Otahuhu to Westfield Junction Section giving consideration to bringing forward elements of work where their delivery in conjunction with or as part of the East/West Link (RLTP Appendix 2) works will be highly disruptive to services and/or materially more expensive if not done concurrently

As noted above, KiwiRail accepts that the level of detail set out above is beyond what the RLTP should show. However, we believe that if the RLTP takes an approach consistent with ATAP by identifying what is the next priority initiative or work, it does give other decision-makers a clear signal when responding to requests.

KiwiRail's Capital Programme in Appendix 3

KiwiRail accepts that the document is intended to endure over many years, so we anticipate that the table will become increasingly correct as time progresses. However, we would like AT to be clear that at the time of making this submission KiwiRail has no funding for any of the programmes identified.

The table below sets out projects in same order as Appendix 3 with the current position on funding and anticipated status.

Table 2: KiwiRail's comments on current project funding status

Number	Item	Status and anticipated status
1	Additional Traction Feed West (\$25m)	<ul style="list-style-type: none"> • original funding requested to Crown Budget 2018 was for investigation only. • full bid was to follow for Budget 2019. • identified in Transitional Rail Activity in Government Policy Statement Land Transport (GPS)1 • earliest start 1 September 2018
2	Auckland Train Control and Network Management Centre (\$20m)	<ul style="list-style-type: none"> • original funding requested to Crown Budget 2018 was for the initial phases with future scope determined by extent to which AT/KiwiRail/City Rail Link Limited and other agencies seek to co-locate their control centres • full bid was to follow for Budget 2020 • identified in Transitional Rail Activity in GPS1 • earliest start 1 September 2018 – with potential for further delay
3	Britomart East Remodelling (\$31m)	<ul style="list-style-type: none"> • no bid submitted at this time. • overall scope uncertain until City Rail Link(CRL) design progresses • consequently, not identified in GPS1
4	Pedestrian Crossing Grade separation (\$20m)	<ul style="list-style-type: none"> • no bid submitted at this time – will be done in tandem with AT • consequently, not identified in GPS1
5	Pukekohe to Papakura Electrification (\$202m)	<ul style="list-style-type: none"> • original funding requested to Crown Budget 2018 was for full amount • identified in Transitional Rail Activity in GPS1 • earliest start 1 September 2018
6	Rail Network Resilience and Performance Programme (\$42m)	<ul style="list-style-type: none"> • no bid submitted at this time – will be done in tandem with AT • consequently, not identified in GPS1 • needed pre CRL opening

Number	Item	Status and anticipated status
7	Rail Network Resilience and Performance Programme – Catch-up Renewals (\$125m)	<ul style="list-style-type: none"> • original funding requested to Crown Budget 2018 was for investigation only • full bid was to follow for Budget 2019 • identified in Transitional Rail Activity in GPS1 • earliest start 1 September 2018
8	Tranche 1 Level Crossing Grade Separation (\$185m)	<ul style="list-style-type: none"> • no bid submitted at this time – will be done in tandem with AT. • Consequently, not identified in GPS1 • needed to be underway pre CRL opening
9	Upgrade of Onehunga Line (\$69m)	<ul style="list-style-type: none"> • no bid submitted at this time • likely to be at end of Decade 1
10	Wiri to Quay Park (\$147m)	<ul style="list-style-type: none"> • original funding requested to Crown Budget 2018 was for full amount • identified in Transitional Rail Activity in GPS1 • earliest start 1 September 2018

While it's perhaps folly to predict the outcome of other's decision-making processes, particularly when the processes themselves are not yet finalized, KiwiRail's view of the likely outcome of the above funding requests is:

- items 1,2,5,7,10 (total \$524m) - If it is recognised that business cases submitted under the Crown Better Business Case are consistent with the principles of NZTA's Business Case approach, then these projects (now identified in the Transitional Rail category) could commence September 2018
- items 3,6 (total \$73m) – at the time these bids are submitted they will stand on their merits and be delivered in time for CRL
- items 4, 8 (total \$205m) – the biggest risk will lie in the public's acceptance of road closures and changes to local road alignments. In KiwiRail's view these will need to be seen in the context of an overall road/rail safety and road congestion management programme carrying into subsequent decades. Without political will these works may be delayed. KiwiRail is keen to see grade separation projects implemented as they enhance both network capacity and most critically, reduce safety risks at level crossings.
- item 9 (total \$69m) – this will be viewed on its merits and the current RLTP will have been superseded well before then

Given the current fluidity about sources of investment capital it's likely that new and altered rail funding sources won't be fully worked out until GPS 2. However, KiwiRail considers that the draft RLTP is well placed to take up any new funding opportunities.

If you have any queries or would like to discuss any of the points raised please contact myself or Pam Butler, Senior RMA Advisor with KiwiRail on (04) 498 2127.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'D Gordon', with a stylized flourish at the end.

David Gordon
Group General Manager, Investment, Planning and Risk



14 May 2018

Ak Have Your Say
Auckland Council
Private Bag 92 300
Auckland 1142

Email: akhaveyoursay@aucklandcouncil.govt.nz

Dear Sir/Madam,

Re: Submission on Draft Auckland Regional Land Transport Plan (RLTP) 2018-2028

Thank you for the opportunity to make a submission on the above document.

By way of introduction, Ma Development Enterprises (MADE Group) is committed to the Auranga Urban Development project at Drury West, South Auckland (Franklin Local Board). The project is being undertaken on greenfield land of which 83ha has a live urban zoning allowing 1350 homes with 104 lots released to the market in November 2017 (Auranga A). The project also includes a further 84ha of greenfield land (Auranga B) that has been subject to a private plan change to allow for a further 1300 homes. MADE has invested \$360M+ to agglomerate these landholdings and committed approximately \$30M to enable bridge upgrades, cycleways, walkways, reserves and coastal tracks as part of the infrastructure serving the project. MADE has committed to developing an integrated township and to this end has undertaken masterplanning for a wider area in Drury West of 460ha.

Overall, the strategic direction of the Draft RLTP is supported; in particular support is given to increase funding for greenfield growth to enable the delivery of homes and businesses with infrastructure that improves accessibility and safety. It is noted that the Draft RLTP acknowledges that such development is frequently dependent upon the provision of new transport infrastructure and services, requiring investment by both developers and the public sector. To bring land forward for development at Auranga, MADE has acted as a "first-mover developer", forward funding infrastructure that assists in unlocking its own land and which also has wider benefits. MADE seeks to work and collaborate with the relevant public agencies to ensure that infrastructure agreements recognise the shared benefits that first-mover developers provide.

In terms of the importance of the specific transport projects in the south being proposed to be funded by the Regional Fuel Tax (RFT) the following are all considered to be "very important":

- Project 8, Road safety
- Project 11, Mill Road Corridor
- Project 12, Road corridor improvements
- Project 14, Growth related transport infrastructure (transport and facilities for new housing developments)

Safety

It is recognised that the Government has announced the development of a new road safety strategy ready for implementation in 2020 and that Auckland Transport is also intending to develop an Auckland road safety

MA DEVELOPMENT ENTERPRISES

Level 33, ANZ Tower
23 – 29 Albert Street
Auckland

made.co.nz



strategy, taking account of the Safe System/Vision Zero approach. The Draft RLTP identifies that NZTA intends to improve safety along SH22 corridor from the SH1 Drury interchange by reducing the speed limit to 70km/h. A slower speed limit is desirable and is supported. However, without signalisation which slows traffic down, it is understood that it would be more difficult to achieve a slower speed limit along this stretch of highway based on the requirements to change road speed limits.

Supporting Growth and Unfunded Works

The allocation of \$275M as part of the Supporting Growth programme (page 63, Appendix 1) to support high priority greenfield areas is supported. It is noted that the southern rail stations, including at Drury and Drury West, are in Auckland Transport's 'unfunded' capital programme, as is the Bremner Road extension west. Both the upgrade of rail lines and provision of rail stations are critical to achieving integrated urban neighbourhoods as well as assisting in taking a significant amount of traffic off the motorway and arterial road system. MADE seeks that such vital works be considered for inclusion in the current 2018-2028 RLTP as part of the 'supporting growth' programme. This is consistent with the goals of RLTP to have an accessible land transport system.

It is noted that the Local Residential Growth Fund (LRGF) provides \$391M (pg 63) for transport infrastructure to support housing. Auranga looks forward to working with Council to determine whether there are projects at Drury West that may meet the criteria for funds to be allocated from the LRGF.

Corridor Improvements

As indicated above, the new corridor of Mill Road is seen to be very important to support growth in the south. Similarly, the southern corridor improvement (completion of the widening of the southern motorway) is also seen to be critical to support growth in the south.

Inter-regional Priorities

It is acknowledged that Auckland's growth and effectiveness of its transport network is impacted by its neighbours in the upper North Island. Support is therefore given to ensure strong strategic road connections between Drury and Tauranga via the Waikato region and also to Government's intention to introduce inter-regional rail services between Auckland, Hamilton and Tauranga as a means of supporting growth, housing and reducing congestion on the southern motorway.

NZTA Investment Programme

The initiative to establish a joint AT/NZTA Supporting Growth Alliance to look at route protection for the preferred network in the southern growth area is supported.

Thank you for the opportunity to make a submission to the Draft RLTP. If you have any queries could you please contact Gary Noland, General Manager – Development, MADE (gary@made.co.nz).

CHARLES MA

CHIEF EXECUTIVE OFFICER

+64 21 159 7165

charles@made.co.nz

MADE.CO.NZ



SAFE JOURNEYS
for **ACTIVE KIWIS**

14 May 2018

Submission on Auckland's RLTP

Support the significant investment into walking & cycling, especially SkyPath and the SeaPath connection of an off-road shared path from Northcote Point to Esmond Road.

We request that the 'Fossil' fuel tax to be put towards low emissions transport such as Cycling, Walking and Public Transport.

Recommend a moratorium on new motorways and road widening, we must prioritise investment in the sustainable modes of walking, cycling & public transport. These modes have been neglected for 60+ years and the effects are evident with Auckland roads congested, unsafe and unsustainable.

Note: Please do not refer to road widening as "Roading Improvements" as such projects have the effect of inducing more traffic which simply worsen the congestion across the network (and generally make conditions worse for walking, cycling & public transport. Interestingly NZTA and AT will not consider the effects of induced traffic (this maybe because such effects would give their roading projects very poor BCR's). Whilst a roading engineer might use the term "Roading Improvements", that's only because of the limited way in which they view the world - a transport planner never would.

The case for change

Unfortunately, New Zealand's high rate of road fatalities and injuries are only the tip of the iceberg. Our transport system is underperforming in many critical areas: it is highly dependent on motor vehicles, prone to traffic congestion, lacks resilience, has poor integration between modes, is our fastest growing source of CO2 emissions, a significant cause of air pollution causing respiratory illness especially in young and old, and is often not safe - especially for vulnerable road users, thus the active modes of transport are not an option for many New Zealanders and lifestyles have become sedentary.

We cannot create safe travel for the active modes in isolation, New Zealand's transport system needs to be transformed so that all modes are integrated into a safe, efficient and sustainable system.

The objectives for such a safe, efficient and sustainable transport system in New Zealand must include supporting economic activity, improving the health, safety and accessibility of New

Zealanders, while at the same time addressing climate change and other environmental impacts¹.

A new approach to transport planning is required

The last 60 or so years of transport planning in New Zealand has been predominately roading orientated in order to allow/encourage the growth in private motor vehicle use. The underlying approach has been that “we can build our way out of congestion”. However this approach has failed us because new roading generates more traffic and it is not physically or financially possible to create sufficient road space for every person to efficiently use their own vehicle.

The future is likely to see the rise of electric and self-driving cars. However they are a slow and gradual evolution of the current transport system that doesn't address the key issues. In fact self-driving cars may generate a significant increase in traffic.

We need a new approach that delivers success based on the following Key Performance Indicators:

- NZ's rate of road death and serious injury compared to the best OECD nations
- The degree to which all aspects of the transport system are regarded by users as very safe
- Measures of mobility for school children and disabled persons
- Whether carbon and pollution emissions are in steady decline (in absolute terms)
- Whether traffic congestion delays have plateaued or are in decline
- The portion of the freight task carried out by coastal shipping and rail
- The degree to which transport modes are integrated and complement one another

A comprehensive and effective approach is required to meet these formidable challenges along with the needs of different industries and people in all communities (from freight movers and vehicle owners to public transport users and those who walk or cycle).

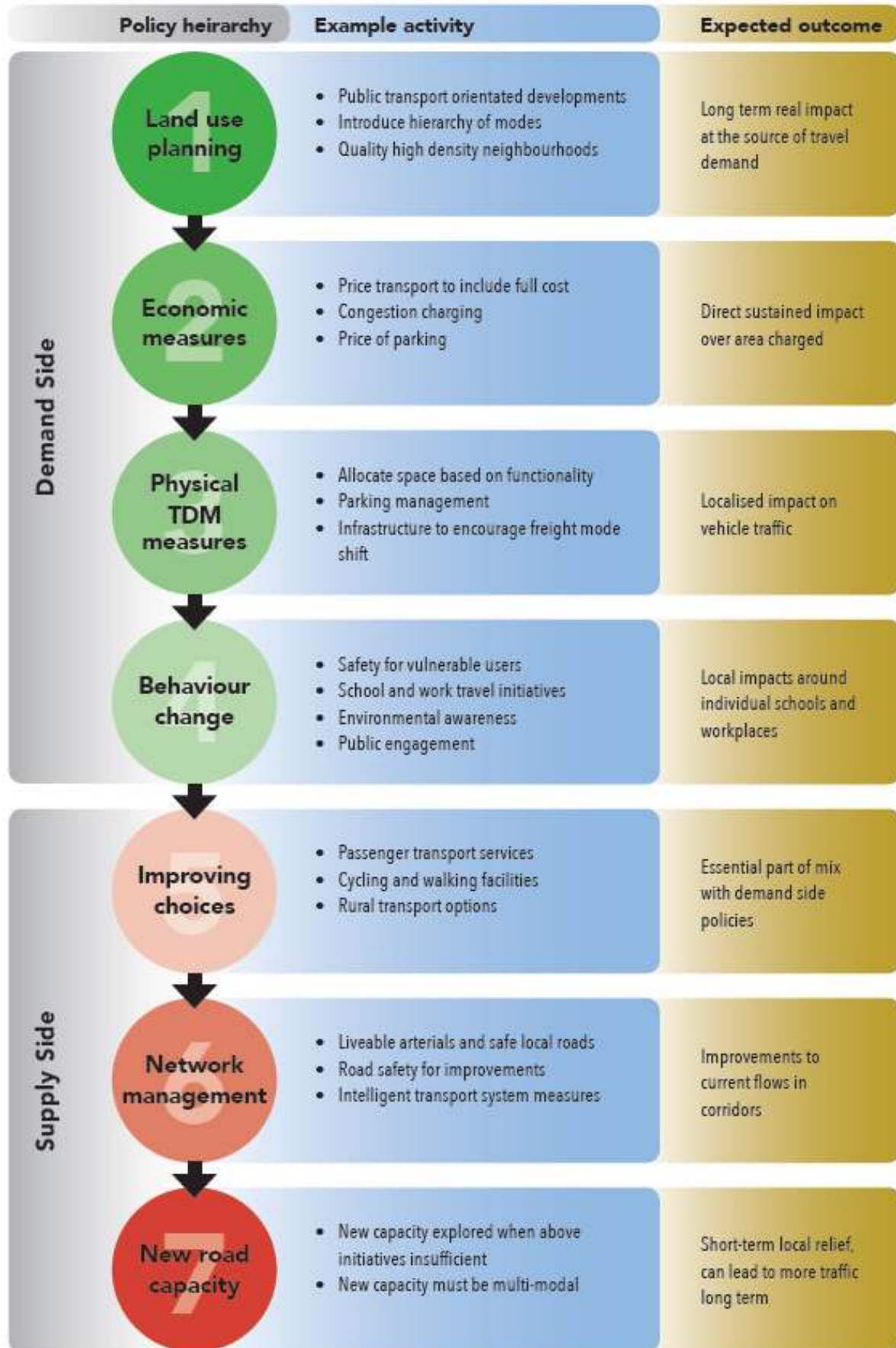
Such an approach is found in the Hierarchy of Treatments for Transport Planning, see Figure 1 on next page. This is a best practice approach to transport planning that encompasses the 'big picture' yet provides succinct prioritisation of the many various transport interventions to deliver on the Key Performance Indicators above.

The Hierarchy of Treatments is the heart of the planning and implementation regime for a safe, efficient and sustainable transport system. All policies and plans must align with and demonstrate how they support the Hierarchy of Treatments².

¹ NZ Transport Strategy 2008 – Ministry of Transport

² An example is provided in Attachment 2: Hierarchy of Treatments for Transport Planning prepared by the Auckland Regional Land Transport Committee (2008)

Figure 1: Hierarchy of Treatments for Transport Planning



In reviewing the Hierarchy of Treatments for Transport Planning for New Zealand’s context, **Movement** has identified nine key actions areas:

<p>Nine key actions for a safe, efficient and sustainable transport system in NZ</p>	<p>Alignment with the Hierarchy of Treatments:</p>
<p>1. Greater investment in active transport to provide high quality facilities for all New Zealanders wishing to get about on foot, horse, bicycle or mobility device.</p> <p>Increase investment for active modes to at least 5% of GPS to provide more and wider footpaths, safe pedestrian crossings, protected cycle lanes and shoulders on rural roads.</p> <p>Review all transport projects (including maintenance) before implementation for opportunities to improve conditions for active transport users.</p>	<p>Policy hierarchy 1 and 5</p>
<p>2. Sensible speeds. Safer traffic speeds are the single most effective invention to make our roads safer.</p> <p>Adopt the Vision Zero³ approach to speed management. Typically this means 80km/h on undivided rural roads, 60km/h for unsealed roads and 30 km/h around schools, shops and community facilities. Cost-effective traffic calming and enforcement (eg: speed cameras) are an important tool to ensure adherence to the safer speed limits.</p>	<p>Policy hierarchy 2</p>
<p>3. Safe space for people walking, cycling or using mobility aids.</p> <p>Legislate for a mandatory 1.5 metres minimum passing distance of cyclists by motorists. More safe pedestrian crossings (raised table) and treatment of unsignalised slip lanes. Education campaign to ensure motorists accessing driveways give way to pedestrians on the footpath. Stiffer penalties for motorists causing the deaths of pedestrians and cyclists.</p> <p>Adopt the <u>Road User Hierarchy</u>⁴ and implement it in conjunction with good urban design.</p>	<p>Policy hierarchy 1</p>
<p>4. Improve road safety. Central Government to adopt Vision Zero and make greater investment in road safety improvements, especially road median barriers, centreline rumble strips, road shoulders and foot paths on rural roads.</p> <p>More policing of our roads focused on speed, seat belts, alcohol and mobile phone use. Prohibit the use of speed radar detectors. Increased automatic</p>	<p>Policy hierarchy 6</p>

³ See: “Vision zero: a toolkit for road safety in the modern era”

⁴ See: <https://www.nzta.govt.nz/assets/resources/pedestrian-planning-guide/docs/chapter-5.pdf>

speeding tickets and red light cameras. Introduce compulsory third party insurance to deter modified high performance vehicles, eg: boy racers, loud mufflers.	
<p>5. Fewer Trucks. Trucks are involved in 1 in 4 fatalities on our roads. Prioritise freight onto rail and coastal shipping (by having trucks pay their fair share for road maintenance).</p> <p>Restrict the heaviest trucks from accessing urban areas and roads not designed to handle their weight or mass.</p>	Policy hierarchy 3
<p>6. Enhanced public transport through greater investment and priority.</p> <p>Implement a reward scheme to encourage more people to use public transport because it contributes to safer, stronger and more equitable communities, reduces congestion, transport pollution, and the need to build more roads.</p>	Policy hierarchy 5
<p>7. Economic measures: These include road pricing, carbon tax on fossil fuels and car registration fees to encourage reduced use of private vehicles and ownership of smaller (or alternatives to) combustion vehicles.</p> <p>Remove the full hypothecation of fuel taxes, as this motivates NZTA to prioritise transport solutions for greater motor vehicle use. Review NZTA's Financial Assistance Ratios and provide greater flexibility to the GPS ranges to remove mode bias eg: Motorways 100% Government funded but public transport over the same route is only 50% funded.</p>	Policy hierarchy 2
<p>8. Higher standards Emissions testing (eg: Euro 5 or 6) introduced as part of the Warrant of Fitness testing. Mandatory professional driver licence training (including in-class driving education) and re-testing of licences every 15 years to help raise the standard of driving behaviour.</p>	Policy hierarchy 1
<p>9. Replace NZTA's Cost/Benefit business case with multiple criteria decision analysis (MCDA) to evaluate transport projects within the framework of the options within the Hierarchy of Treatments for Transport Planning. This is a more transparent approach that considers the broader social, economic and environmental impacts.</p>	Policy hierarchy 7

The results of implementing these nine key actions in conjunction with the hierarchy of treatments for transport planning (Figure 1 above) will be hugely positive. We can reduce our dreadful rates of road death and injury, improve travel choice and efficiency for all New Zealanders whilst reversing the significant environmental footprint of transport.

We can make our transport system safe, efficient and sustainable by 2030.

Movement is an alliance of organisations working to achieve a safe, efficient and sustainable transport system that provides for all; including those New Zealanders wishing to get about on foot, horse, bicycle or mobility device.



Disabled Persons Assembly NZ



Doctors for Active Sustainable Transport

@NZSCHOOLSPEEDS

Corporate sponsors:





SUBMISSION BY NATIONAL ROAD CARRIERS (INC) TO THE DRAFT AUCKLAND REGIONAL LAND TRANSPORT PLAN 2018-2028

14 May 2018

Submission by: National Road Carriers (Inc)

Submission to: Auckland Council
 Email: akhaveyoursay@aucklandcouncil.govt.nz

Auckland Transport
 Email: rltp@at.govt.nz

Address for service: National Road Carriers
 Attn: Grant Turner
 Ph: 09 636 2953
 Mob: 021 771956
 Email: grant.turner@natroad.co.nz

KEY POINT SUMMARY

The National Road Carriers submission:

- *Agrees* with Government that **Auckland has an infrastructure crisis**, and that's what the Regional Land Transport Plan (RLTP) should recognise and be focused on addressing with immediate urgency and using funding and procurement tools of a scale and dimension to give certainty that we are making progress to solve the 'crisis' with speed and urgency;
- *Notes* that 63.25 million tonnes of road freight currently originates in Auckland and is projected to increase to 108.63 million tonnes by 2046 – an increase of 72% (RLTP, p18), and that around 80% of the freight moved remains within Auckland; and therefore,
- *Strongly agrees* with the comment (RLTP, p.19) that *“the key challenge will be to limit the growth in congestion on the freight network, particularly in the interpeak, and to improve the efficiency of connections to major freight hubs.”*
- *Seeks* inclusion of a clear programme or works (projects) in the RLTP designed specifically to ease (not just limit) growth in congestion on the freight network, supported by targets (KPIs), milestones and timelines; i.e. a programme which supports the p.19 RLTP comment.
- Our *highest priority* projects (freight focus) mentioned in the RLTP are:
 - The reframed East West 'freight' Link, with 3rd rail freight line and upgraded Southdown freight terminal (and other detail in our submission, paragraph 49)
 - Mill Road – but as full corridor to Bombay
 - SH20B widening, but linked to joining up with SH20A with a turnpike to the Airport
 - Penlink – but ideally done in parallel with 3-laning SH1 between Albany and Silverdale.

- Other projects that should be included are:
 - SH1/18 Grafton Gully to Quay St link (Grafton Gully Stage 3) – route protection is urgently needed
 - Waitemata Harbour Crossing – a status update on progress to address weight stress limit deadline for heavy vehicles (trucks and buses) scheduled for early 2020s
 - 3-laning SH1 Mt Wellington Highway overpass, as 1st stage of a project to 3-lane the entire Auckland motorway network between Bombay and Warkworth
 - New Karaka to Weymouth connection to SH20 south western motorway, including rapid transit to Airport
 - Selected road-rail crossing separation – before CRL is completed and priority for freight network routes
 - Selected arterial road improvements – to improve efficiency & safety of links to freight hubs.
- On funding NRC *recommends and supports* the RLTP making clear that:
 - “Available” funding, including from the Regional Fuel Tax (RFT), is insufficient to address Auckland’s current transport challenges or solve our congestion ‘crisis’;
 - Auckland needs to move quickly to introduce a permanent demand management ‘tool’ designed to ease congestion and raise new revenue;
 - Notes NRC’s preference is a congestion tax on the motorway and key arterial networks using existing technology; and,
 - Uptake of PPPs supported by sustainable revenue streams is a key step needed for moving Auckland closer to delivering solutions to its key transport challenges.
- *Recommends* a clear outcome statement or plan (supported by maps) be included in the RLTP of what Auckland’s integrated transport network will look like for moving people and goods by 2028 – If we don’t know where we are going, how can we get there?

INTRODUCTION

1. **National Road Carriers (NRC) welcomes the opportunity to make a submission on the **Draft Auckland Regional Land Transport Management Plan 2018-2028****
2. **National Road Carriers confirm they wish to present to the committee.**
3. NRC headquartered in Auckland is New Zealand’s leading road transport member based association providing services, advice and advocacy for and on behalf to those who choose to earn a living in transport and logistics. Some 54% of NRC’s membership comprises single vehicle operators and 89% employ 10 or less, including many who are located and/or service customers in Auckland and neighbour regions Waikato, Bay of Plenty and Northland and expect their views to be highlighted in this Submission.
4. The NRC is dedicated to working for and with members to achieve continual improvement in all aspects of the industry including safety, recruitment and retention of staff, compliance, profitability and professionalism.

Auckland’s heavy freight profile

5. The draft RLTP (p.18) notes that 63.25 million tonnes of road freight currently originates in Auckland and is projected to increase to 108.63 million tonnes by 2046 – an increase of 72% (National Freight Demand Study 2014). Around 80% of the freight moved remains within the Auckland (1% is moved to the north and the remaining 19% is moved south).
6. In terms of heavy freight, the highest concentration of container freight movements are to-from New Zealand’s two largest container ports – Ports of Auckland in central Auckland and Southdown’s Metro Port. Approximately one million containers are moved by Ports of Auckland every year – 85% by road – and around 780,000 containers are moved through MetroPort every year, with around 6,000 heavy truck movements a day in Church Street alone.

7. The rail terminals in the Onehunga-Penrose area help load and unload around 4.6 million tonnes of rail freight each year, which is moved between Auckland, the rest of the New Zealand and the world. Much of this rail freight is moved by road for either the first or last leg of its journey.
8. Auckland's heavy freight profile also includes a significant number of car carrying vehicles, especially between Ports of Auckland and South Auckland where imported vehicle service businesses are located. There are also large fleets of heavy freight vehicles responsible for distribution of retail goods around Auckland and carrying heavy metal and fuel supplies.

SUBMISSION

9. NRC's submission focuses on the three questions the draft RLTP seeks feedback from a freight sector perspective: Does the draft RLTP:
 - I. Correctly identify the transport challenges facing Auckland?
 - II. Allocate available funding to the highest priorities?
 - III. Exclude projects or activities from the proposed transport programme that should be included?

I. Auckland's transport challenges

10. In the short time available to review the draft RLTP, NRC agrees that Auckland's major transport challenges have been identified but submits that they could be more usefully described and highlighted to better reflect the huge scale of 'catch-up', investment and increased pace of action that is required, if Auckland is to get in front of its transport challenges in the foreseeable future; i.e. by 2028. In particular, we highlight three major transport challenges facing Auckland:
 - The congestion challenge,
 - Integrated network and urban development challenges; and,
 - The funding challenge.
11. **The congestion challenge** – is understated in the draft RLTP and there is no clear plan or targets set out to ease congestion on key routes, and especially to prevent congestion on the freight network spreading further into the inter-peak period.
12. The finalised RLTP needs to clearly state that Auckland has a "congestion crisis." A recent NZIER study that NRC co-sponsored concluded that Auckland is losing \$1.3 billion a year in lost productivity every working week (8-hour day, Monday-Friday), with much of this loss being carried by the commercial and freight sectors. (The cost of congestion during weekends and outside normal working hours was not assessed.)
13. Congestion is now so bad in Auckland that many commercial and distribution firms turn business away if it involves starting a trip or taking on new delivery after 2-3pm.
14. Freight sector travel time costs are typically around \$60 and projected by the industry to increase by around 2-3% in coming months as the impact of the proposed Regional Fuel Tax (RFT) is felt, adding to Auckland's productivity loss and cost of congestion.
15. NRC strongly endorses Transport Minister Phil Twyford's recent comments when introducing the RFT Bill to Parliament that: *"Auckland's congestion crisis is plaguing the city. Auckland is basically grinding to a halt before our eyes."*
16. We agree and having a senior Government Minister declare to Parliament and New Zealand that Auckland has a transport crisis on its hands should be a wake-up call for some crisis-management action. We can't be complacent anymore.

17. The RLTP needs to be strengthened to more accurately reflect the Auckland's transport 'crisis' and the need for the pace of action to address it to be dramatically lifted. Whether through NZTA or AT nothing new aimed at reducing congestion has been started since the commencement of the Central Rail Link (CRL) and SH20 Waterview Tunnel projects 3-5 years ago.
18. The draft RLTP states (p.17) that Auckland's arterial road network has suffered a 25% reduction in performance over the three years to 2017. At that rate, much of Auckland's arterial road network will be gridlocked throughout the working day by 2028 – "Auckland IS grinding to a halt before our eyes". This statistic on its own should be a wake-up call that the pace of action needs to increase – continuing with a 'business as usual' approach won't cut it.
19. NRC agrees that at the heart of addressing Auckland's worsening congestion challenge centres on a step-change to provide Auckland with modern (first-world) public transport infrastructure and services, as well as a world-class road network. In simple terms, a public transport option that reduces the number of single-occupant commute vehicles on motorways and arterial roads will 'free up' road space for commercial and freight traffic; traffic which has no option but to use the road network to move around Auckland.
20. NRC therefore strongly agrees with the Freight growth facts and trends set out in the draft RLTP (pps 17-19), and especially the comment (p.19) that *"the key challenge will be to limit the growth in congestion on the freight network, particularly in the interpeak, and to improve the efficiency of connections to major freight hubs."*
21. An action plan to ease (not just limit) growth in congestion on the freight network needs to be clearly spelt out in the finalised RLTP. Our suggestions of what projects and activities will contribute to achieving this goal are set out below.

Auckland's integrated transport network challenges

22. **Supporting improved freight links to key freight hubs** - As submitted previously, NRC seeks a clear description or outcome statement (complete with maps) of the single joined-up transport network Auckland is seeking to build. What will Auckland's transport network look like and comprise in 2028? It is impossible to tell from the draft.
23. A 'whole of network' description of the integrated network we want to build by 2028 is required that includes details of the 'fit for purpose' transport investments needed to address immediate problems as well as investments required for coping efficiently with future growth.
24. In respect of the freight 'network' component of Auckland's transport infrastructure picture, we appreciate the inclusion of a map (p.18) showing Auckland's current freight network. A supporting map showing what the freight network will look like in 2028 and how it will perform as congestion is eased (as the draft states is a key goal - p.19) would help.
25. We request that the map and RLTP text be supported by a list of the key projects that will be delivered specifically to ease congestion affecting the freight sector, especially what projects are proposed to improve connections to current major freight hubs.
26. **Supporting improved transport links to designated urban growth areas** – NRC notes that Auckland's Unitary Plan has designated three areas - the south (around Drury), the west (around Whenuapai – West Harbour) and north (around Silverdale & Warkworth) – where the city's future urban (and business precinct) growth will be located.
27. By 2028 it is envisaged that around 110,000 new homes will have been built and 50,000 new jobs will have been created. Key motorways and arterial roads serving these areas are already congested most days. As well as commuter traffic to-from these areas, there is an increasing amount of commercial and freight traffic associated with the large property developments

already underway, and time-cost delays have noticeably become worse over the last three years.

28. In terms of the projected increase in Auckland's freight growth task indicated in the draft RLTP, NRC believes that a significant portion of the freight challenge over the next few years will centre on serving these growth development hubs efficiently; i.e. without incurring increased time-cost reduction in productivity.
29. An integrated approach to improve transport access to the three growth areas for moving both people and goods is crucial, if the target of easing congestion and improving productivity and people's lifestyles are to be achieved under the RLTP.
30. We recommend the finalised RLTP have a section highlighting Auckland's urban growth intensification areas and targets, and which includes a clear description of the transport programmes that will be delivered to support this growth.
31. For example, government has announced a mass light rail project between the CBD and west Auckland; there is a busway for serving northern suburbs and which could be extended further north towards Silverdale, but what are the plans for moving freight to the west, south and north – there are none it appears.

Auckland's funding challenge

32. Messaging about Auckland's funding challenge in the draft RLTP needs to be clarified and pointed towards the urgency of the city introducing a permanent alternative funding source that can also address Auckland's congestion crises with speed and urgency.
33. At a high level, the RLTP needs to clearly state that 'available' funding is insufficient to address Auckland's current transport challenges let alone those in the future.
34. Comments to the NRC suggest that many Aucklanders are expecting immediate congestion benefits from paying the RFT, and the tax will solve Auckland's transport issues.
35. It won't. The RFT is scheduled to last no more than 10 years. Meanwhile Auckland's population is growing faster than projected, and Auckland's vehicle fleet is increasing by up to 800 a week. Auckland Transport Alignment Project (ATAP) officials and other government agencies have projected that congestion will continue to get worse for at least the next 10 years – until a comprehensive road pricing system is introduced.
36. The RLTP needs to be clear that the RFT is a temporary revenue source while a more sustainable and permanent alternative (or new) source with the scale required to reduce congestion immediately and raise revenue for ongoing investment is determined.
37. NRC strongly supports increased investment to give Auckland a world-class public transport system and a campaign to increase patronage to get single use vehicles off roads in peak commute hours.
38. Two years ago, an ATAP report suggested a congestion charge has three times greater economic benefit than an RFT. Implementation requires more investment, but the economic benefits outweigh the costs.
39. For these reasons, on balance, the NRC view is that the RFT is a diversion from where the major effort should be – i.e. introducing a comprehensive congestion tax scheme geared as a tool to manage demand and raise the substantial revenue Auckland urgently needs to get on top of its transport crisis.
40. It isn't rocket science, and proven technology (gantry systems and/or eRUC) is used in cities worldwide, to both limit traffic volumes and raise revenue. The technology used for collecting

tolls at the Puhoi tunnels and on the highway in Tauranga could easily be installed on Auckland's road network.

41. We also support the RLTP including the option to introduce Public Private Partnerships (PPPs) as part of the solution to Auckland's transport funding challenge.
42. Through our membership of the Auckland Business Forum, NRC understands that there is strong institutional and international funding sources available to help procure and deliver all of Auckland's critical but currently unfunded transport projects through a PPP model – from \$400m for Penlink at the small end to building multi-story park-and-ride facilities at all Auckland's key bus and rail hub stations to the \$3.2 billion-plus that will be needed for the third Harbour Crossing (Tunnels) at the big end.
43. Ideally, we would welcome early introduction of alternative funding options to recognise the critical need for urgent action to solving Auckland infrastructure crises. Using PPPs as part of the solution to Auckland's transport funding challenge and ease congestion is long overdue.
44. We note a PPP model is proposed for the introduction of a mass rail transit system in Auckland. A similar strategy to bundle key roading projects to a scale to make them immediately attractive for funding through a PPP mechanism would be supported by NRC – e.g. the full Mill Road extension corridor, and the 3-lane widening of SH1 Albany to Silverdale and the Penlink and selected other roading projects.
45. **In summary**, NRC recommends the RLTP be strengthened to reinforce action with immediate urgency on key transport challenges, including that:
 - It is now time for dramatically faster action to identify and deliver projects that will measurably reduce congestion;
 - Continuing with a 'business as usual' approach to address Auckland's transport challenges won't be sufficient – under current policies and plans congestion will get worse for the foreseeable future;
 - We need to move quickly to introduce a permanent demand management 'tool' designed to reduce congestion – our preference is a congestion tax on the motorway and key arterial networks using existing technology;
 - Uptake of PPPs supported by sustainable revenue streams is a key step needed for moving Auckland closer to delivering solutions to its key transport challenges
 - A clear outcome statement or plan of what Auckland's integrated transport network will look like for moving people and goods by 2028 is required. – if we don't know where we are going how can we get there?

II. Has “available” funding been allocated to Auckland's highest priority transport projects?

III. What projects or activities have been excluded from the proposed transport programme should be included?

46. NRC asserts that delivery of Auckland's highest priority projects should NOT be decided by whether funding is 'available' as the draft RLTP has been prepared; rather, priority transport projects should be decided on the basis of their support of a wider business case ranking – i.e. not just their Benefit-Cost ranking, but how they help serve Auckland's rapid growth, unlock whole of life outcomes, drive improved delivery performance, serve customers better (and for PPPs, realise new revenue streams).
47. Once key transport projects are agreed, the funding and procurement model required to deliver them all with speed and urgency should then be determined. Clearly, under current procurement methods there is insufficient funding 'available' to allocate to ALL Auckland's highest priority projects.

48. From a freight perspective, NRC notes the proposed RLTP programme includes three “ready to go” projects:

- **Mill Road Stage 1**– However, NRC strongly recommends that the full Mill Road corridor to Bombay be considered; factors include the likely increased cost from delaying the full project and the potential to apply alternative funding to help secure the project. Without the full project congestion benefits will be delayed, and there will be no alternative route relief from Southern Motorway shut downs as have occurred frequently in recent months.
- **SH20B widening from Puhinui Rail Station to Airport with a rapid transit (bus) service** – We strongly encourage it be fast tracked for completion by 2019-20, ahead of the America’s Cup and APEC conferences in 2021. Ideally this link should be done in parallel **with a proposed link between SH20B and SH20A** (see below) to enable freight trips from the south heading to the Ascot Ave freight area to avoid travelling through Auckland Airport.
- **Penlink** - provision of a link between SH1 Northern Motorway and Whangaparoa Peninsula to bypass the constrained Silverdale interchange. This will provide a 20minute time saving for the estimated 400 heavy truck freight trips per day to-from the Peninsula and give an option to commercial traffic to provide an extended service through the working day that is currently limited as a result of the all-day congestion on the existing route through Silverdale. Ideally the project would be done in parallel with **3-laning SH1 between Albany and Silverdale**.

49. Projects critical to Auckland’s improved freight sector performance – and easing congestion – that are not in the 2018-2028 RLTP programme and/or have an unclear status from the information provided BUT should be included with clear start-completion dates and funding include:

- **The reframed East West ‘freight’ Link (EWL)**. Currently, heavily congested local roads carry more than 6000 heavy trucks every working day. For NRC the EWL is Auckland’s number one project. We strongly recommend the project be done in parallel with the Third (and 4th) Main Trunk Rail and expanded Southdown Rail Freight Terminal. Both the EWL and 3rd Rail have strong businesses cases, are ready to go and are of the highest priority and urgency, especially as government intends to increase inter-provincial rail freight infrastructure and services (via KiwiRail).
- Accepting that easing congestion is a key goal of the RLTP, the EWL could be usefully linked with widening the **SH1 Mt. Wellington Highway over-pass** to 3-lanes in both directions. This project is needed to remove one of Auckland’s (and New Zealand’s) most notorious congestion bottlenecks.
- Another option for widening the Mt Wellington Highway overpass is to include it as the first stage of long-term project NRC recommends to 3-lane Auckland’s entire motorway network between Bombay and Warkworth.
- We have also suggested the reframed EWL could be configured to form part of a staged ‘whole of route’ East Tamaki to Pakuranga corridor project. NRC notes the commitment in the RLTP to complete public transport improvements in the area (i.e. AMETI project), but it should also be noted that local roads in the area carry some of New Zealand’s highest numbers of heavy trucks – higher than many State Highways.
- The long-proposed **SH1/18 Grafton Gully to Quay Street link (Grafton Gully Stage 3)** – this project is critical to completing the SH18 corridor into the city centre, and vital for removing the about 35,000 vehicles per day (including 4000 heavy trucks heading to-from Ports of Auckland) that travel from Tamaki Drive to the Motorway via lower Parnell local roads (The Strand). Various design options exist for the route (including tunnels

under or a bridge over the railway lines between Stanley St and Quay St). NRC notes that the RLTP shows Tamaki Drive to be among Auckland's most congested peak hour routes. Given the urban development proposals frequently discussed for this area of central Auckland, we **strongly recommend** that Auckland Transport/NZTA **give urgency to securing route protection for the link.**

- Improved access to the **Cleveland Quarries**. As the future demands of the city grows so does the need for development and infrastructure materials. Aggregate supplies are a key ingredient of this demand, yet resource consents limit the availability of material and substandard road infrastructure to these resources limits productivity through the use of high productivity motor vehicles which would assist in controlling vehicle numbers and improve safety for all road users.

50. Other projects NRC recommends status updates be considered for inclusion in the finalised RLTP of the following often-discussed major projects:

- **Waitemata Harbour Crossing** – has a deadline of early 2020s for weight stress limits for heavy vehicles, trucks and buses (Beca report 2010). The project needs to be integrated with proposed cross-harbour public transport (mass transit) provision. NB: under current planning, it will be 10 years before it can be consented.
- A new **Karaka to Weymouth connection** to the south western motorway, and which includes a rapid transit lane to Auckland Airport.
- **Linking SH20A & 20B** with a turnpike to the Airport, to address freight and general traffic congestion on the routes within the Auckland Airport precinct.
- Selected **rail-road level crossing separation**, especially on freight priority routes – to be completed before CRL opens.
- **Arterial Road improvements** – to focus improvements on improved freight performance with measurable 'economy and productivity enhancement' top of mind.

Concluding comments

51. *Priorities - NRC seeks*

- A finalised RLTP focused on delivering projects that demonstrably show measurable (KPI) transport, city building and economic & productivity enhancement benefits; and especially an easing of congestion;
- A Plan which stakeholders can be confident will be delivered and contribute towards providing Auckland with a modern, world-class 'fit for purpose' integrated transport system;
- A Plan which the freight sector can get behind and support.

52. We agree with Government that **Auckland has an infrastructure crisis**, and that's what the RLTP should be focusing on addressing with immediate urgency and a set of funding and procurement tools of a scale and dimension to give certainty that we are making progress to solve the crisis with speed and urgency.

53. Our suggestions and recommendations to the Draft RLTP 2018-28 are put forward in the positive spirit of continuous improvement to Auckland's freight transport infrastructure and services.

Grant Turner

Executive Officer



Draft Proposal for a Regional Fuel Tax and Draft Regional Land Transport Plan

FEEDBACK FORM

Feedback must be received by 8pm on Monday 14 May 2018.

Please read the documents available at akhaveyoursay.nz or at any library, service centre or local board office before you give feedback. They have more information about the issues and choices that we want your feedback on.

All of the questions below are optional. We encourage you to give feedback online at akhaveyoursay.nz, or you can complete this form and return it to us using one of the options below.

Email

Scan your completed form and email it to akhaveyoursay@aucklandcouncil.govt.nz.

In person

Drop your completed form off at your local library, service centre or local board office.

By post

Place your completed form in an envelope and send it to freepost address:
AK Have Your Say
Auckland Council
Freepost Authority 182382
Private Bag 92 300, Auckland 1142

Your name and feedback will be included in public documents. All other personal details will remain private.

First name:

Last name:

Email address or postal address:

Your local board:

Is your feedback on behalf of an organisation or business?
(If yes, this confirms you have authority to submit on the organisation's behalf)

Yes No

Name of organisation or business:

The following information is optional but will help us know whether we are hearing from all Aucklanders.

Are you: Female Male Gender diverse

What age group do you belong to?

Under 15 15-24 25-34 35-44
 45-54 55-64 65-74 75+

Which of the following describes your ethnicity?
(Please select as many as apply)

Pākehā/NZ European Māori Samoan
 Cook Islands Māori Tongan Chinese
 South East Asian Korean Indian
 Other (please specify)

Do you consider yourself part of the following communities?

Rainbow (LGBTQIA+)
 Disability

QUESTIONS RELATING TO THE DRAFT PROPOSAL FOR A REGIONAL FUEL TAX

To answer the following questions, please read the draft proposal document. All of these questions are optional.

Question 1

Without a Regional Fuel Tax (RFT) the funding available will only cover renewing our existing transport network and the projects we have already committed to for example the City Rail Link.

To enable us to deliver projects that improve congestion, public transport and road safety, we recommend an RFT of 10 cents per litre plus GST (11.5 cents). What is your opinion on this proposal?

Support Do not support Other

Please comment:

NZ Walking Access Commission submits no comment on the RFT, the level of RFT, or the designation of RFT funding to specific programmes, types of projects or outcomes. The Commission is, however, keenly interested to submit on the overall funding priorities expressed in the proposed RLTP, including those that are within the ring-fence for RFT funding.

Question 2

We are proposing the RFT funds the projects listed below. How important are these projects to you?

	Very important	Moderately important	Less important
Project 1: Bus priority improvements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 2: City centre bus infrastructure (facilities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 3: Improving airport access	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 4: AMETI Eastern Busway	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 5: Park and rides	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 6: Electric trains and stabling (storage facilities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 7: Downtown ferry redevelopment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 8: Road safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 9: Active transport (walking and cycling)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 10: Penlink	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 11: Mill Road Corridor	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 12: Road corridor improvements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 13: Network capacity and performance improvements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 14: Growth related transport infrastructure (transport services and facilities for new housing developments)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Any other comments?

Specific projects will vary in importance depending on the level of impact the project offers in enhancing public access to the outdoors, and to connectivity. For example, Mill Road Corridor is important because depending on design and build parameters, the project investment could yield a net positive or net negative impact on public access to and through Totara Park; or on connecting suburban Manurewa to the rural landscape to the south and east. The same principal applies to Penlink and to Growth related transport infrastructure.

Road safety is critically important to public access provision, and in particular the Commission draws attention to the importance of getting cycling off-road wherever possible, and grade-separated where not, with the aim of making safe cycle routes wherever possible in order to encourage more people to use them.

QUESTIONS RELATING TO THE DRAFT REGIONAL LAND TRANSPORT PLAN

To answer the following questions, please read the draft document. All of these questions are optional.

Auckland's recent significant population growth has increased demand on the transport system and caused challenges that need to be addressed over the 10 years of this plan. These issues include:

- safety
- impact on the environment
- congestion
- supporting growth in the region.
- decreases in accessibility

Question 3

Do you think we have correctly identified the most important transport challenges facing Auckland? Yes No

If No, what do you think should be included?

The Walking Access Commission strongly supports the inclusion of provisions for a network of landscape-scale public access corridors where the primary objective is connectivity with - and access to - the outdoors. The main focus of the proposed RLTP continues to prioritise movement over place, getting through the outdoors, between built environments, rather than on being in the outdoors. It correctly identifies the transport network as comprising a significant proportion of the public realm in Auckland, but does not go nearly far enough to cater for the outdoors as a place, and movement in the outdoors as a destination activity in itself - i.e. some significant portion of the time a sizeable portion of the human population wants to be moving through the landscape on foot or bicycle (or horseback) to enjoy being in the outdoors. With 2 million foot visits to the Waitakere Ranges needing accommodation elsewhere for the foreseeable future of the RLTP, the Commission views landscape trails as a pressing investment priority. It is also a key priority at this point in time, with quality, connected greenfields development offering a viable alternative - new urbanites exploring local landscape trails - to burgeoning burden on the roading network from those seeking recreational activities in the ever-more-distant rural outdoors.

Question 4

To help us understand whether we have the allocation of funding right, please indicate how important the following areas are to you:

	Very important	Moderately important	Less important
Safety: high-risk road upgrades; speed management; monitoring of high-risk areas.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public transport: extending the rapid transit network; bus priority lanes; new electric trains.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Walking and cycling: cycleways to make cycling safer; new footpaths and widening existing footpaths; promoting walking and cycling.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting growth areas: funding for transport infrastructure in high-priority greenfield areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Environment: making street lighting more energy efficient; encouraging use of electric vehicles; reducing pollution from road discharge into stormwater drains.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Network optimisation: dynamic traffic lanes; synchronising traffic signals; optimising road layout.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Corridor improvements: new local roads; upgrades to existing roads; upgrades to State Highways.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 5

Are there any projects or activities you think should be included? Yes No

If Yes, what are these?

~~Greenways plans are currently the most coherent description of need for landscape-scale connectivity between and through green-blue corridors, and they identify outdoor experiences and destinations that are valued by locals and visitors alike. Greenways can form a core part of active transport provision for Aucklanders, they provide attractive public realm benefits, environmental benefits (e.g. as wildlife corridors); and are expressions of local identity, cultural heritage and pride of place. The Commission strongly urges the investment of transport infrastructure and operations funding in this form of strategic landscape-scale connectivity to and through the outdoors.~~

The provision for walking & cycling needs to be revised (much the way that the draft GPS has revised the dichotomy between local roads and state highways) to recognise that the outdoors, for many urbanites, is the local blue-green corridor, and connectivity to that aspect of the outdoors is crucial for liveability.

14 May 2018

Auckland Regional Transport Committee
C/- Auckland Council
Private Bag 92300
Auckland 1142

Submitted via email <<rltp@at.govt.nz>>

Submission to Proposed Regional Fuel Tax and Draft Auckland Regional Land Transport Plan 2018-28

Introduction

Newmarket Business Association “NBA” represents over 1,300 businesses within the precinct. Through the BID programme, we work with the Auckland Council and Local Board to improve the local business environment and grow the local economy.

The Auckland Regional Transport Committee is seeking feedback on the Proposed Regional Fuel Tax and Regional Land Transport Plan 2018-28. Your on-line form sets out four key questions.¹

Our feedback on these questions is set out below. In summary:

- we agree that rapid population growth in Auckland has brought with it significant transport challenges and we support the focus in your proposals on public and active transport, which will free up road capacity;
- our preference is that demand management of our existing transport network be a key solution (following ‘user pays’ approaches, such as congestion charging);
- although the NBA initially supported the proposed RFT; the government’s proposed fuel excise duty increase, and equivalent road user charge increases, is cause for concern. We feel this may ignite inflationary pressures, as additional costs are passed on through the supply chain;
- we are concerned that the significant works planned (such as cycleways and light rail), will result in disruption detrimental to businesses and we ask that any disruption be properly mitigated (and transparently funded through a development response budget)
- road corridor improvements together with enhancing network capacity are a priority for us to make better use of the existing transport network and increase travel times through key routes and corridors.

¹ See <https://at.govt.nz/about-us/transport-plans-strategies/regional-land-transport-plan/>

NEWMARKET.

NEWMARKET BUSINESS ASSOCIATION

Question (1) - Draft Regional Fuel Tax Proposal

Your on-line consultation says that without a Regional Fuel Tax (RFT), the funding available will only cover renewing our existing transport network and the projects we have already committed to, eg the City Rail Link. You say that to enable you to deliver projects that improve congestion, public transport and road safety, you recommend an RFT of 10 cents per litre plus GST (11.5 cents). You have asked for our opinion on this proposal, and especially if we support it, are neutral or oppose this proposal.

We agree with your assessment that rapid population growth has brought challenges, including increased congestion, reduced accessibility, increased deaths and serious injuries on the road network, and increasing negative impacts on the environment.² We also accept that we are not going to address this problem simply by building more roads. Demand management of our existing network has to be a key solution, especially creating priority for freight and delivery movements.

We recognise the need for increased funding for transport projects and services. The NBA supports a funding mechanism that enables all the agreed transport projects in the RLTP to be delivered against agreed timelines, ideally however we believe Central Government should step-in and deliver the funding mechanism required. We also note, according to Auckland Council's own poll of more than 10,000 people, that the rate-paying public's support for the RFT has overwhelmingly reversed.

Our preference is to introduce initiatives that both manage demand and raise funding equitably as soon as possible (such as congestion charging), balanced with investment into affordable and more frequent public transport in order to effect sustainable behavioural change.³ This is important to support business and employment growth in line with population growth.

While we initially supported a regional fuel tax of 10 cents per litre (plus GST), the previously unannounced additional 9-12 cent per litre national fuel tax (to be brought in over the next three years) will place a further unexpected financial burden on business. This is likely to cause a supply chain knock-on effect that may deliver unintended consequences such as price rises on consumer goods and services. The RFT is expected to raise \$150M a year, however a substantial portion of this amount could be raised through further efficiencies and improvements across the council group.

Question (2) -Regional Fuel Tax Projects (or projects funded through alternative means)

Your on-line consultation says that you are proposing to spend the Regional Fuel Tax (RFT) on various programmes and projects, including: (1) Bus priority improvements; (2) City centre bus infrastructure (facilities); (3) Improving airport access; (4) AMETI Eastern Busway; (5) Park and rides; (6) Electric trains and stabling (storage facilities); (7) Downtown ferry redevelopment; (8) Road safety; (9) Active transport (walking and cycling); (10) Penlink; (11) Mill Road Corridor; (12) Road corridor improvements; (13) Network capacity and performance improvements; and (14) Growth related transport infrastructure (transport services and facilities for new housing developments). You have asked how important these projects are for us.

We support the shift of focus to public and active transport. Our support is based on modelling and business case evidence supplied by Auckland Council and their agencies,

² See *Draft Auckland Regional Land Transport Plan 2018-28*, page 3.

³ One concern we have with a regional fuel tax is that some people who will use the Auckland motorway system (e.g. driving into Auckland from the regions or driving through Auckland), will purchase fuel outside Auckland and avoid the tax.

which indicates investment across public and active transport modes will free up road capacity, especially for freight and business traffic.

However, our learnings from recent examples mean that we hold major concerns with the significant works planned (such as light rail) and some of those already underway (such as cycleways) that there will be harmful disruption to businesses during construction and over the longer term. In the interests of the Auckland economy, it is of utmost importance to us that a comprehensive strategic development plan be implemented so that any business disruption be identified, minimised and avoided where possible through careful project management, and adequately funded initiatives be designed and actioned to remedy and mitigate any disruption that is unavoidable.

We have identified (Item No. 12) Road corridor improvements as well as (Item No. 13) Network capacity and performance improvements, as being very important.

With regard to road corridor improvements, we agree that congestion on the arterial network is a significant concern, especially congestion on the freight network. While we agree that corridor improvement is important, we ask that the emphasis be first on improving connections to existing urban areas, the efficiency of existing urban corridors and improving access to the Ports of Auckland port and Auckland Airport.⁴

With regard to network capacity and performance improvements, we agree that Auckland needs to make better use of its existing transport system to increase the number of people who can travel through key routes and corridors. We also support Auckland ensuring that the operation of existing transport infrastructure and services are optimised. The efficiency and coordination of traffic signals must be improved to enhance throughput and reduce delays. More dynamic traffic lanes must be introduced to improve peak traffic flows, and give priority to freight movements on key freight connections.⁵

Question (3) - Regional Land Transport Plan

Your on-line consultation says that Auckland's recent significant population growth has increased demand on the transport system and caused challenges that need to be addressed over the 10 years of the plan. These issues include safety, congestion, decreases in accessibility, impact on the environment, support growth in the region. You have asked whether we think you have correctly identified the most important transport challenges facing Auckland.

While we agree overall with the challenges you have identified (safety, congestion, decreases in accessibility, impact on the environment and supporting growth), as you also note, improving network capacity and performance by making the most of the existing transport system is key.

You have properly said that this must focus on optimising the transport network through targeted changes, such as improving the coordination of traffic lights, the use of dynamic lanes at peak times, and removing bottlenecks to mitigate congestion. Maximising the benefits from new technology and taking opportunities to influence travel demand are also important, as well as introducing pricing to address congestion as soon as possible.⁶

Collectively, improving network capacity and performance has been identified as the highest priority transport challenge in this joint submission, followed closely by the other factors outlined in the Plan.

⁴ See Draft Auckland Regional Land Transport Plan 2018-28, page 45.

⁵ See Draft Auckland Regional Land Transport Plan 2018-28, page 40.

⁶ See Draft Auckland Regional Land Transport Plan 2018-28, page 40.

NEWMARKET.

NEWMARKET BUSINESS ASSOCIATION

Question (4) - Funding Activities

Your on-line consultation asks us to indicate how important the following areas are to us: (1) Safety; (2) Public transport; (3) Walking and cycling; (4) Supporting growth areas; (5) Environment; (6) Network capacity and performance; and (7) Corridor and roading improvements. You have also asked if there are any other projects or activities we think should be included.

Again, as noted above, overall we believe network capacity and performance as well as road corridor improvements are very important, with the remaining areas also being important to us. Please see Appendix 1 'Newmarket Project Priorities'.

Conclusions

While we welcome the release of the Regional Land Transport Plan as well as the Auckland Transport Alignment Project Report and the greater clarity this now brings to funding requirements, expenditure and broad delivery timeframes for transport projects across Auckland, we also need more detail on the precise timing and the relative priorities for both the funded and unfunded projects set out in the Plan.

It is also of utmost importance to us that early and clear channels of collaborative communication are established between the delivery agencies (such as Auckland Transport) and the NBA in areas affected by the planned works in order to facilitate a smoother transition and a more efficient outcome for the projects.



Mark Knoff-Thomas
Chief Executive
Newmarket Business Association

mark@newmarket.co.nz

APPENDIX 1

NEWMARKET PROJECT PRIORITIES (grouped under your Project Description headings)

On-going Operational Programmes (page 63)	
Advanced Destination Signage	Destination signage in and around the Newmarket perimeter to identify alternative routes to the CBD and motorways, that do not include Broadway.
Improvements Complementing Developments	Communicate with NBA and developers from the outset. An upcoming example: work with the Fortune Arising Development Company (Hong Kong) when they develop plans for The Warehouse site at 64-74 Broadway, to include an additional access-way to the Newmarket train station from the northern end of Broadway
Parking Programme	Expand Residential Parking Zones all across Newmarket and surrounding suburbs.
PT Safety, Security and Amenity and other Capital Improvements	Improve CCTV coverage at Newmarket train station, including Station Square, and collaborate better with other key security stakeholders, namely NBA, Newmarket Police, Westfield and Cityguard.
Safety Related Projects (page 64)	
Urban Road Safety Programme	Improve road crossing safety from Teed Street across Broadway to Station Square by expanding the area for traffic lights to create a “mega-crossing” from Morrow Street to Teed Street
Safer Communities and Speed Management	Reduce speed limit on Broadway to 30 or 40km per hour
Active Transport (page 65)	
New Footpaths Regional Programme	Upgrade and widen uneven and dangerous footpaths in McColl, Roxburgh, Melrose and Kingdon Streets
Urban Cycleways Programme	Complete Newmarket to Parnell cycleway via Newmarket Park and through the dis-used rail tunnel. We would NOT support a cycle route that included Broadway.

NEWMARKET.

NEWMARKET BUSINESS ASSOCIATION

Other bus network improvements (page 67)	
Newmarket Bus Terminal/ Layover	We support in principle, however we are also advocating for a Youth Park in this vicinity, and that has our full support. We would not support AT if the land use was in competition to the Youth Park.
Rail improvements including bus-rail interchange (page 68)	
Newmarket bus to rail station connection	We fully support improvements to the access way to Station Square and the Newmarket Train Station. We would also encourage use of electronic signage on Broadway showing train times.
Active Transport (page 72)	
City Southern Cycle Link	We support in principle, however we would NOT support a cycle route that included Broadway.

**AUCKLAND COUNCIL DRAFT AUCKLAND REGIONAL LAND TRANSPORT
PLAN AND PROPOSED REGIONAL FUEL TAX**

SUBMISSION BY NORTH SHORE AERO CLUB

SUBMITTER DETAILS:

1. Name: North Shore Aero Club
2. Address for Service:
Postal: C/- Haines Planning
PO Box 90842
Victoria Street West
AUCKLAND 1142

Email: kaaren.rosser@hainesplanning.co.nz
3. Contact Person: Kaaren Rosser
Senior Planner
Haines Planning
4. Date of Submission: 14 May 2018

SCOPE OF SUBMISSION:

5. Property Address: North Shore Airport, 270 Postman Road, Dairy Flat 0794
6. This submission relates to the draft Auckland Regional Land Transport Plan (ARLTP) in its print version but does not discuss the proposed regional fuel tax.
7. The following aspects of the draft ARLTP consultation documents are discussed in the submission below:
 - a) The strategic importance of North Shore Airport and its links to the proposed transport programme under the ARLTP;
 - b) The absence of a regional air transport strategy in the ARLTP;

- c) The impacts of delivering the Supporting Growth North and SH1 (north of Albany) transport projects on North Shore Airport.

INTRODUCTION:

8. North Shore Aero Club (“NSAC”) owns and operates the North Shore Airport located near the centre of the Future Urban zoned land at Dairy Flat. The airport has its own Special Purpose – Airport zone under the Auckland Unitary Plan.
9. It is situated almost immediately adjacent to the Northern Motorway, allowing direct transport links to the Hibiscus Coast, the North Shore, and suburbs north of the Waitemata Harbour. Currently, 500,000 people within Auckland live closer to North Shore Airport than Auckland International Airport. This number of people is expected to grow to approximately one million in the next 30 years using population projections from Statistics NZ.
10. NSAC currently has 545 members and 185 aircraft whose home base is North Shore Airport. Approximately 200 people are employed at the Airport, which also operates a highly successful flight training school. The Airport services commercial passenger flights to smaller destinations such as Great Barrier Island and Kaitaia. It is the home to a number of emergency services, including Northland Emergency Rescue and flying doctor services.
11. The functions and strategic importance of North Shore Airport will inevitably grow in the future. NSAC confirms that the Airport is poised to offer a significant regional contribution to the regional transport economy by providing further and more frequent air connections. In this context, the draft ARLTP is important, as it signals which land transport capital projects may be allocated for funding. This submission focusses on the following two matters in the ARLTP:
 - a) The ARLTP needs to identify and coordinate its priorities with the smaller airports as it does for Auckland Airport and thereby provide for the growth of North Shore Airport as part of its transport strategy;
 - b) There are capital projects proposed in close proximity to the Airport, which may impact on its accessibility and ability to expand.
12. NSAC has previously submitted to the Future Urban Land Supply Strategy and the Silverdale West Dairy Flat Business Area Structure Planning Consultation Documents. These submissions outline the constraints and growth opportunities for the Airport with respect to future urban areas surrounding the Airport, and they provide useful background information

regarding airport operations. These submissions are **attached** at Annexures 1 and 2.

13. NSAC also provided a submission on the Council's 2050 Auckland Plan and 10 Year Budget, where it put forward the proposition that in order to meet Auckland's growing infrastructure needs, air transport needs to be part of the overall transport strategy, which currently focusses only on land transport. NSAC has requested that a budget to be provided to confirm and support its findings on the need for North Shore Airport to become a new regional airport. NSAC's submissions on the Council's 2050 Auckland Plan and 10 Year Budget are **attached** at Annexure 3 and 4.
14. NSAC notes that very little time has passed to enable comments from the 2050 Auckland Plan and 10 Year Budget consultation to be incorporated into the draft ARLTP. NSAC therefore reiterates the key propositions for the associated ARLTP.

AUCKLAND'S INFRASTRUCTURE NEEDS

15. The draft ARLTP recognises that accommodating Auckland's rapid population growth, and in particular opening up rural land for development, is dependent on the provision of new transport infrastructure and services. While the ARLTP focusses on land transport, and some ferry services, NSAC submits that the Council must also consider how the region will be served by air transport as part of an overall transport plan.
16. Infrastructure is defined by the Resource Management Act 1991 ("RMA") as including "*stormwater and wastewater networks, land transport structures including roads, but also airports*". Airports provide public air passenger transport, plus freight, business and emergency services. The Council currently has a 22.3% shareholding in Auckland International Airport Ltd. Throughout the country, smaller regional airports are considered important to the local economy.
17. NSAC submits that Auckland Council has not adequately considered air transport in the wider region thus far and suggests that North Shore Airport is strategically located near excellent transport connections to serve the north of the region in a greater capacity.

AIR TRANSPORT – WHERE DELIVERY OF AIR TRANSPORT IS PART OF THE PLAN

18. Comparing the per capita relationship between population and the number of airports serving international cities, Auckland will need another airport by 2040. Research also shows that for every increase in the urban population of

1%, there is a corresponding increase in airline passenger numbers of 1.5% (Richard Florida 2012).

19. There are also operational pressures on Auckland Airport due to the rising passenger and cargo numbers. Smaller aircraft are discouraged from using Auckland Airport due to congestion. While Auckland Airport is proposing to expand to cope with this demand via a second runway, North Shore Airport will be able to complement this demand for regional air transport, and provide non-competing services to smaller regional centres, together with some trunk routes.
20. North Shore Airport can become a fully functioning regional airport, to meet the needs of Auckland, with an approximate 500 metre extension of the current main (03/21) runway. This would enable 50-seater aircraft to access the Airport. North Shore Airport can also provide landing slots for smaller aircraft displaced from Auckland Airport. This issue has recently been in the spotlight with Air NZ ceasing some of the smaller regional routes.
21. A runway extension of 500 metres would enable North Shore Airport to function and act as a viable regional facility, providing air transport and freight to most regional locations within New Zealand. 50-seater aircraft are perceived by the public to be the size of aircraft that are safe and are also large enough to operate with financial efficiency on longer regional routes, with the speed to make travel times competitive with other services from Auckland International Airport.
22. Such an expansion would provide the public with a regional air transport alternative to Auckland Airport that would save time and travel costs for currently 500,000 people who live closer to North Shore Airport than Auckland International Airport. As Auckland grows, these people will have increasingly inequitable access to regional flight choices, and this number is expected to grow to approximately one million in the next 30 years using population projections from Statistics NZ. Most other major international cities have found it necessary to have access to more than one airport. The diagram at **Figure 1** highlights the location of North Shore Airport in the regional transportation context, and shows its unique position for access to the northern urban population of Auckland.

THE REGIONAL LAND TRANSPORT PLAN

23. Although it is noted that ferry projects have been included within the draft ARLTP, it omits consideration of air transport apart from improving road connections to Auckland International Airport. It is submitted that the Plan also needs to address access to North Shore Airport as part of the challenge of serving a growing regional population.

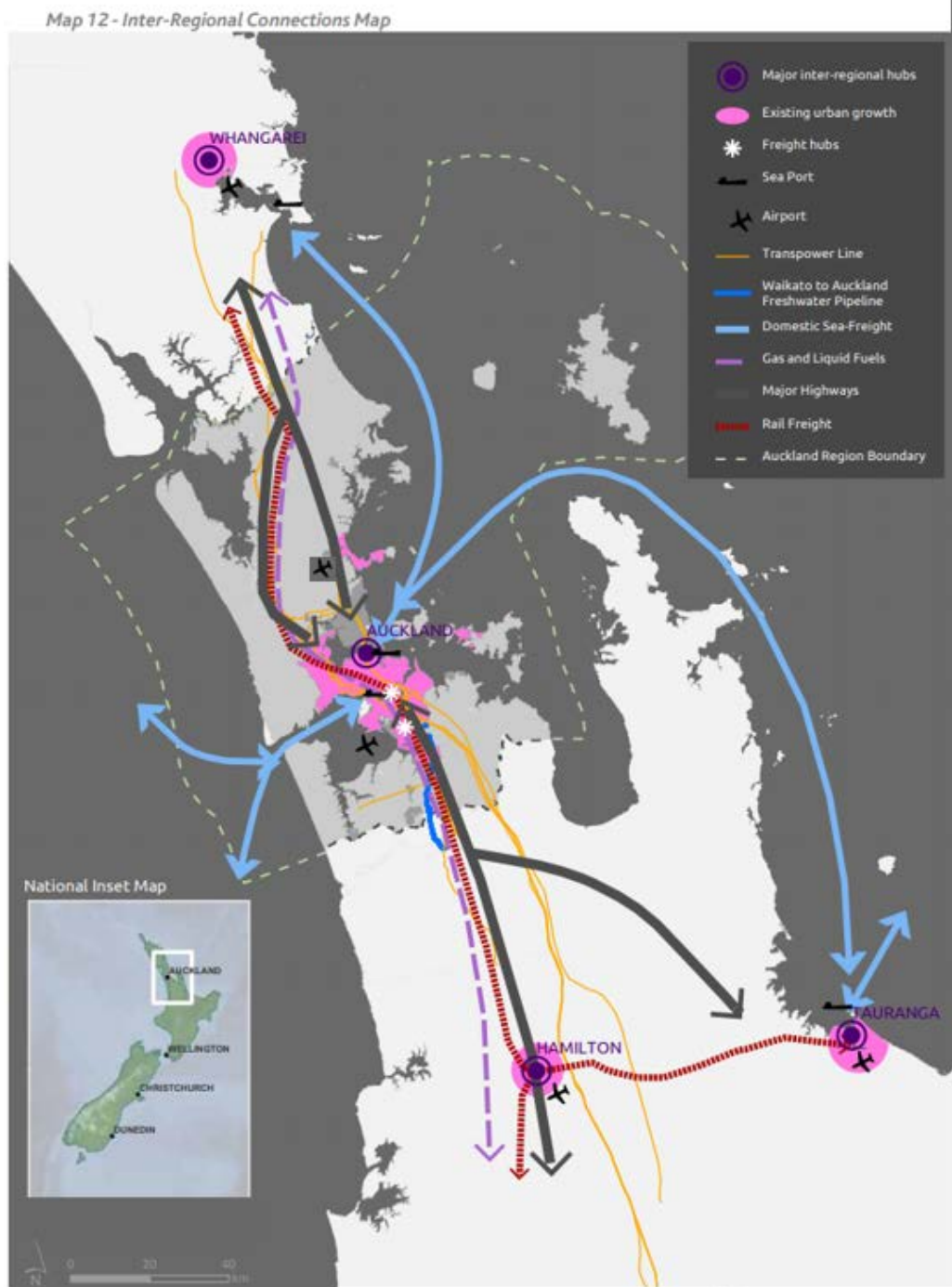


Figure 1 - including North Shore Airport as an important regional connection

24. The development strategy under the Auckland Unitary Plan includes substantial greenfields development to the north of the existing urban areas of Auckland, in Whenuapai, Kumeu, Wainui, Silverdale/Dairy Flat, and Warkworth. These areas will contribute substantially to population growth that requires new transport infrastructure, including air transport. Making better use of the North Shore Airport, with its location surrounded by these new greenfield areas, can be enabled with extension to the existing runway.

By so doing, the North Shore Airport can serve these new areas plus those areas north of the Harbour Bridge with regional air transport connections.

25. It is critical that regional airport accessibility be tackled as an issue now to enable coordination of the urban growth proposed with an expanded airport operation. Some of the possible transport projects listed under the ARLTP to support growth in the north, and improve SH1 (including bus shoulder lanes), require integration with North Shore Airport, which is also a major infrastructure asset.
26. Given the above, the Capital Programme listed under a new Appendix 4 (being Air Programme) of the ARLTP should therefore include the project: **Extension of North Shore Airport** - Delivery of a 500m runway extension to the SW of North Shore Airport to provide improved regional air transport services.
27. The cost is still to be determined, and NSAC may require support from other parties to secure an extension. However, at this stage, the upgrade of North Shore Airport as a future project needs to be acknowledged so that Auckland Transport and NZTA can design their other projects to accommodate it. This is particularly important given the arterial upgrades listed as projects for funding under the ARLTP. NSAC is concerned that the strategic importance and potential of the North Shore Airport will be foreclosed if development around the Airport does not provide for this important transport connection due to a failure to properly it in the ARLTP.

SUPPORTING GROWTH PROJECTS AND SH1 UPGRADES

28. The ARLTP lists the following unfunded projects under Appendix 1B and Appendix 2 that are in close proximity to the airport, and may be prioritised for funding after feedback:

Project Name	Project Description	Indicative Project Cost
Arterials Penlink to Bawden	Upgrading of Bawden Road between Postman Road Extension and the Penlink Redvale interchange on SH1.	40
Arterials Wilks to Penlink	Upgrading and/or re-alignment of Kahikatea and Wilks Roads between Pine Valley Road in the west and Penlink in the east, integrating with proposed south-facing ramps at Wilks Road SH1 interchange.	31
Postman Road East	New north-south road through business area of Dairy Flat from Pine	67

	Valley Road in the north to Dairy Flat in the south (near Bawden Road).	
SH1 North of Albany Improvements	Improvements to SH1, between Albany and Orewa to improve the travel time reliability along this corridor. Includes provision of bus shoulder lanes between Albany and Silverdale?	324

29. It is vitally important that when funds are allocated for these projects, their alignments and designs account for the future extended runway to the southwest of the Airport, and provide for public transport access to the Airport. While some of these aspects can be specified in the contracts to design and construct these roads, NSAC also needs to be represented in the infrastructure planning team, to ensure the integrated design of land and air transport links in the area.
30. In terms of the Wilks to Penlink arterial, for example, this arterial must include public transport links to the Airport from the motorway interchange. A transport hub could easily be incorporated to link with the Airport, utilising land within the airport noise contours. Likewise, for the Postman Road arterial, the design needs to cater for an expanded Airport operation, and allow for the runway extension. This is of paramount importance to the existing and future operation of the Airport.

CONCLUSION

31. Comparing the per capita relationship between population and the number of airports serving international cities, Auckland will need another airport by 2040. This takes into consideration the second runway at Auckland International Airport. The ARLTP needs to acknowledge and provide for this necessity by signalling an expansion of North Shore Airport as an infrastructure project that will require shared investment by the community of Auckland. Without such recognition by the Council, the opportunity to provide needed air transport infrastructure will be foreclosed as future urban areas around the Airport are developed.
32. NSAC requests that, as has recently been acknowledged for the ferry network, funding should also be included and prioritised under the ARLTP to provide for a regional airport strategy. By doing so, provision can be made for expansion of the North Shore Airport.
33. NSAC also requests that, if funding is made available to those Supporting Growth North projects listed under paragraph 28 above, NSAC be represented on the planning team (as a major infrastructure provider) to

ensure that public transport access to the airport is provided, and that the runway extension location is not foreclosed.

34. NSAC looks forward to collaborating closely with AT, NZTA, and Auckland Council planners to ensure that the unique location and opportunity afforded by the North Shore Airport is taken forward, and that funding for growth-related transport infrastructure includes this regionally significant air transport asset.
35. NSAC requests an opportunity to speak to the Council's governing body when it meets to consider submissions on the draft ARLTP.

For and on behalf of North Shore Aero Club:



Kaaren Rosser (BSc, Dipl Nat Res, CertPlan)
Senior Planner

1958 ARLTP SUB

■ Annexure 1

**SUBMISSION ON THE
FUTURE URBAN LAND SUPPLY STRATEGY REFRESH**

Submitter Details:

1. Name: North Shore Aero Club
2. Address for Service:
Postal: C/- Haines Planning
PO Box 90842
Victoria Street West
AUCKLAND 1142

Email: kaaren.rosser@hainesplanning.co.nz
3. Contact Person: Kaaren Rosser
Senior Planner
4. Date of Submission: 24 April 2017

Scope of Submission:

5. Property Address: North Shore Airport, 270 Postman Road, Dairy Flat 0794
6. The aspects of the Future Urban Land Supply Strategy Refresh (FULSSR) that this submission relates to are:
 - a) The sequencing table defining the timing of development ready areas;
 - b) The spatial area defined by the Future Urban Areas Sequencing Maps;
 - c) The infrastructure/sequencing considerations for the Silverdale and Dairy Flat areas.

Submission:

7. The North Shore Aero Club ("Aero Club") owns and operates the North Shore Airport located within the centre of the Future Urban zoned land at Dairy Flat (it must be noted that the airport has its own Special Purpose – Airport zone).

8. In principle, the Aero Club supports the application of a 'business' area around the airport as defined by the Future Areas Sequencing Table for Silverdale and Dairy Flat, subject to the points below, and specifically point 14.
9. The Aero Club also supports, subject to points 10 through 13 following, the proposed resequencing for the Silverdale/Dairy Flat business area, which has the effect of bringing forward by 15 years the development of areas around the airport.
10. The proposed resequencing has collapsed the 5+ year timeframe the North Shore Airport expected to have available to work with the Council and other parties to plan the Airport's future development. Realising that the airport is integral to the successful establishment of businesses and transport north of the Harbour Bridge, there are many opportunities to be explored.
11. The North Shore Airport proposes that, in order to mitigate the compressed planning timeframe, a joint working party of Auckland Council/North Shore Aero Club be immediately formed to study the opportunities and ensure that no decisions are taken which will adversely impact the airport's operation and future developments. This group would provide input to and participate in the development of the detailed structure plan for the area.
12. The Unitary plan recognises the strategic importance of the Northshore Airport to future businesses and residents located north of the Harbour Bridge. The infrastructure policies recognise that all modes of an integrated transport system be enabled, and their existing and future areas and routes identified and protected. The airport needs to be included as part of the transport infrastructure under the FULSS Refresh Infrastructure Study, and sequencing considerations.
13. Accordingly, the process resulting from accelerated sequencing of the area for development must ensure that infrastructure investment in the area is planned in partnership with the airport's operation, future expansion, and access requirements. Consequently, the Aero Club must be a major partner in the structure planning process, including as part of any Infrastructure Provider Group.
14. Bearing in mind the current and future operational requirements of the airport, we also request that the area subject to future structure planning defined as 'Business' on the Future Areas Sequencing Map for Wainui East, Silverdale and Dairy Flat be extended to the south and south-west in accordance with the map at **Annexure 1**. The reasons for this enlargement are as follows:
 - a) The current area ignores the main take-off flight paths to the south-west under which suitable land uses must be carefully considered;
 - b) The area ignores the predominant flight circuit to the south under which suitable land uses must also be carefully considered;

- c) The 'business' area would benefit from being larger to facilitate appropriate economic opportunities for the north;
 - d) The evidence presented for the RUB hearings for the Unitary Plan advocated one structure plan process for the whole of the Dairy Flat area, in order for all the issues in the area to be considered equitably, and avoid a 'piecemeal' approach leading to unintended outcomes. Accordingly, a larger area promotes a holistic integrated approach, and the full assessment of competing land uses, plus the integration of the airport into the wider planned area.
15. In addition, we request that the currently undeveloped land adjacent to the airport currently zoned as Large Lot Residential and defined as the Dairy Flat precinct be included in the structure planning process, and zoned for airport/business use. Given the current difficulties of ensuring that specific development proposals fit within the constraints of the current precinct policies and standards, we believe that all interested parties would support the rezoning of this land.
16. We ask that the Council recognise the importance and difficulty of encouraging business to establish in the area. We note that if significant numbers of businesses could be encouraged to establish ahead of housing in this area, then utilisation of existing transport investments, and in particular SH1, would improve due to a balancing of am/pm flows and in the long run total aggregate travel distances will be reduced. Ultimately if congestion in Auckland is to be reduced more people need to live closer to where they work. The North Shore Airport sees itself as one part of a jigsaw of services and investments that the Council must enable to ensure businesses see the area as an attractive location to establish operations.
17. North Shore Airport has the potential to be a significant regional transport asset, and the centre of a major transport hub incorporating access via strategic roads, busways, park and ride, and freight transportation. It will attract business investment. Possible visions for the airport are attached at **Annexure 2**. The attached document is in a presentation format – resulting from a meeting on 11 April 2016 with Council officers to discuss the airport future.
18. We also note that some of the wastewater infrastructure constraints with respect to increasing the structure plan area may be alleviated by developing a wastewater treatment facility close to the airport, as this would be considered a complementary use.
19. The submitter wishes to be heard in support of this submission.

Signed for and on behalf of:



Kaaren Rosser
Senior Planner

1958 FULSS Refresh SUB

■ Annexure 2



SUBMISSION ON THE

SILVERDALE WEST DAIRY FLAT BUSINESS AREA STRUCTURE PLANNING

CONSULTATION DOCUMENTS

SUBMITTER DETAILS:

1. Name: North Shore Aero Club
2. Address for Service:
Postal: C/- Haines Planning
PO Box 90842
Victoria Street West
AUCKLAND 1142

Email: kaaren.rosser@hainesplanning.co.nz
joemarg01@gmail.com
3. Contact Person: Kaaren Rosser & Joe Smith
Senior Planner North Shore Aero Club
Haines Planning
4. Date of Submission: 23 February 2018

SCOPE OF SUBMISSION:

5. Property Address: North Shore Airport, 270 Postman Road, Dairy Flat 0794
6. This submission relates to the following aspects of the Silverdale West Dairy Flat business area structure planning consultation documents:
 - a) The extent of the structure plan area;
 - b) Matters within the North Shore Airport Topic Report;
 - c) Matters within the Landscape Topic Report and the Business Land Topic Report that relate to North Shore Airport;
 - d) Matters within the Background Report that relate to North Shore Airport.

SUBMISSION:

7. North Shore Aero Club (“NSAC”) owns and operates the North Shore Airport located at the centre of the Future Urban zoned land at Dairy Flat. The airport has its own Special Purpose – Airport zone under the Auckland Unitary Plan. The functions and strategic importance of the airport will have a large influence on the formulation of the structure plan, which the Council has generally recognised.
8. In principle, NSAC supports the provision of a ‘business’ area around the airport but wants to ensure that the following matters are appropriately given due consideration and priority when re-zoning the Future Urban land surrounding the airport.

NORTH SHORE AIRPORT TOPIC REPORT

9. NSAC commends the Council for the information provided in the Airport Topic Report which informs the Background Report for the Structure Plan area. The report outlines the businesses operating at the Airport and the context of the Airport with respect to the relevant policy framework.
10. NSAC has the following comments and recommended alterations to the Topic Report to ensure that the role of the Airport is clearly understood, and the upcoming structure planning appropriately plans for its future.
11. Section 1 and 2.2 of the Topic Report notes that the Airport is not within the structure plan area. It is NSAC’s strong submission that the Airport is integral to the future planning and development of the Dairy Flat area. It must therefore form part of the Structure Plan area, rather than be treated merely as a neighbouring activity that will be “taken into account”. The main reason for this is that the Airport is a regionally significant **transportation** infrastructure asset, which should be given priority consideration when making land use planning and zoning allocation decisions. This is explained more fully below under the Background Report sections.
12. The Airport is described under Section 2.2 of the Topic Report. In terms of an update on airport statistics, NSAC currently has 545 members and 185 aircraft whose home base is North Shore Airport. Approximately 200 people are employed at the airport. The Topic Report should also mention future flight school trends, in addition to forecast aircraft movements, as aircraft movements **from flight training** are set to increase given the world-wide pilot shortage, where 637,000 new pilots are needed over the next two decades, with 40% required in the Asia-Pacific area (2017 Boeing Pilot & Technician Outlook). Already, the flying school has had a 40% increase in student numbers in the last 12 months, and numbers are expected to grow further in the future.
13. NSAC confirms that, in order for the Airport to take advantage of its strategic location and infrastructure capacity, and to accommodate 50 seat aircraft, the

Airport runway requires a 1540m by 150m strip (including runway safety areas). This would entail a 800m extension of airport land to the south-west. It should be noted that an extended runway length would also enhance safety, not only for future operations at the airport, but also the safety of the existing operations.

14. The Council has identified that purchase of land for this extension would be required for any realignment (vertical or horizontal) of Postman Road. NSAC records that there are other mechanisms for ensuring a longer runway length, and that while purchasing the land required is one such mechanism, partnerships are also a possibility, with the designation of land by a Requiring Authority another mechanism available to protect the provision of a runway expansion.

Emergency Training Procedures and Safety

15. The areas to the southwest, west, north east and east of the airport are used when training pilots in the implementation of emergency procedure exercises to simulate the procedures in the event of engine failure or other failure which would otherwise result in an off-airport landing. These procedures are a requirement for training pilots as promulgated by the CAA flight training syllabi, and Daryl Gillett (Chief Flying Instructor) has stated that:

" Civil Aviation rules allow training flights simulating engine failure after takeoff procedures to descend to surface level before ending the simulation. CARs also allow training flights to descend below 500 feet above ground level for the purposes of simulating any necessary emergency procedures."

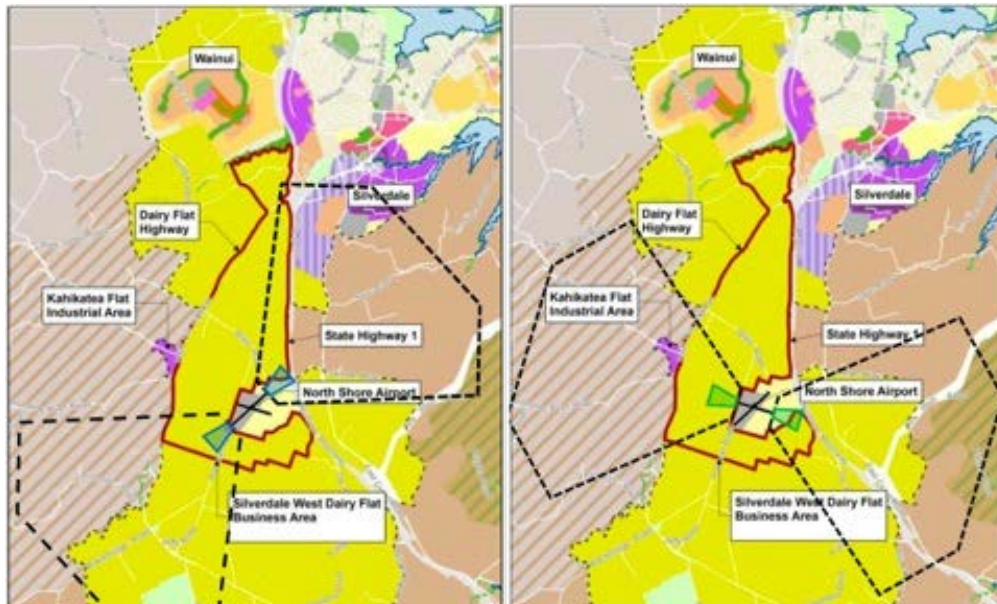


Figure 1

16. These procedures do not follow regular take-off and landing flight paths and can also produce intermittent noise patterns outside what is normally expected at

the airport. They add an extra complexity to the flight patterns over the land surrounding the airport. **Figure 1** shows (as depicted by the dotted black lines) where simulated emergency procedures are carried out, and within which it is most likely that aircraft would be forced to land in the event of an actual emergency. As such, and in accordance with CAA guidance, passive land uses such as reserves, playing fields and golf courses should be located within these areas, to provide for off field landing opportunities to protect aircraft occupants and the public in areas where simulated emergency procedures are carried out.

17. The safety of persons on the ground in the event of an emergency also needs to be considered. If a pilot is required to undertake an emergency landing, the most common location for an emergency landing would be the area shown as dotted black lines at **Figure 2** for an extended main runway (Runway 03/21), and **Figure 1** (right picture) for the crosswind runway (Runway 09/27). Airport safety for emergencies is a major consideration which the Council must plan for.

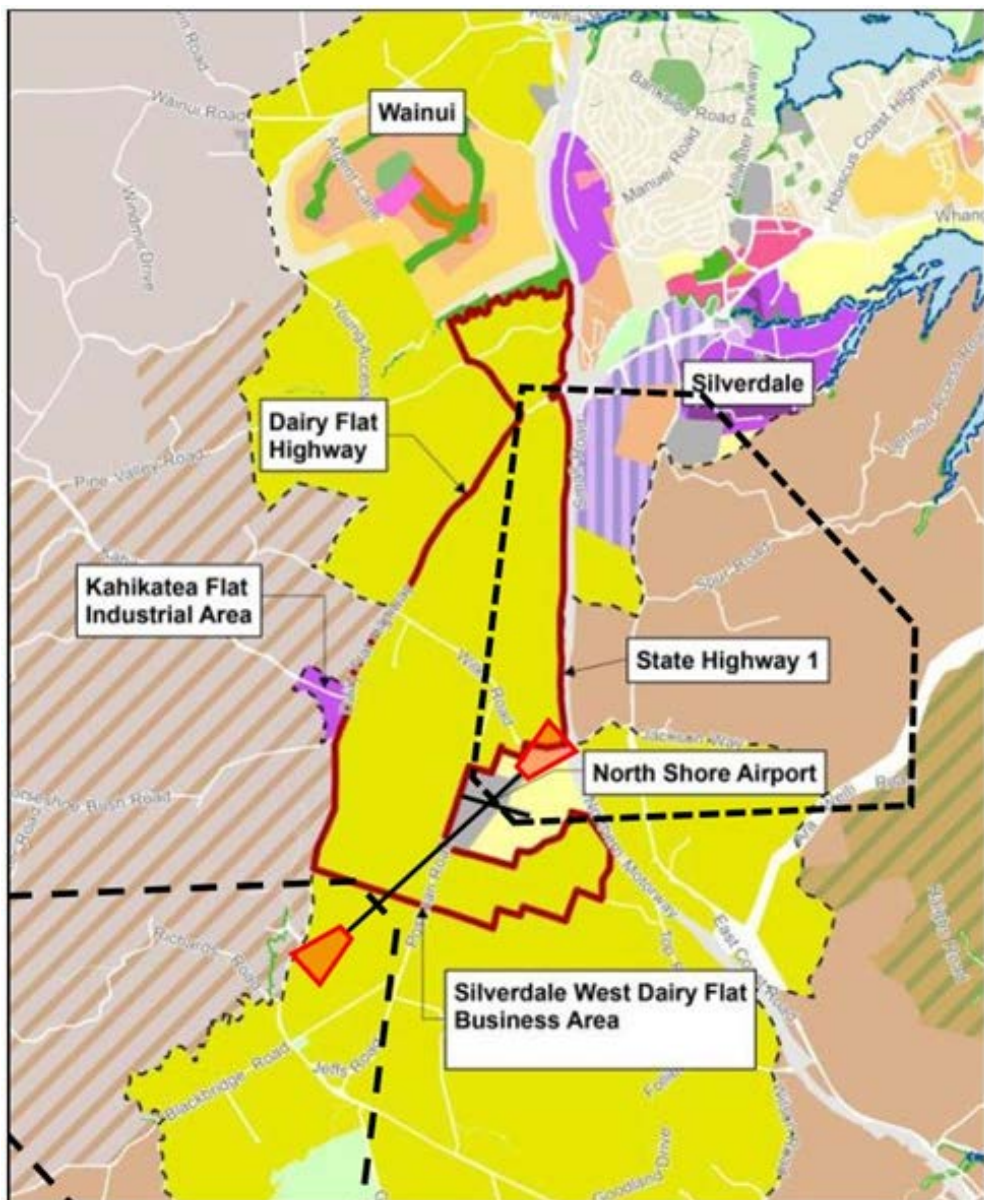


Figure 2

Extension of Structure Plan Area

18. NSAC re-iterates the reasons for extending the business area land to beneath the 55dB Ldn noise contours, as outlined at Page 6 of the Topic Report. NSAC considers that, without an appropriate non-residential zoning on the land to the south-west, considerable reverse sensitivity effects will result if residential uses are zoned for this area, or the re-zoning is not considered in a holistic manner (by inclusion of this land and the Airport within the Structure Plan area).
19. The predominant take-off pattern is to the south-west (SW). Aircraft use the most power, and therefore create the most noise, on take-off. In addition, aircraft enter the circuit pattern by undertaking a left-turn after take-off, in order to facilitate safe and orderly departures and arrivals at the airport, as defined by the Civil Aviation Rules. As stated in the Topic Report, the number of aircraft movements is only expected to increase, and NSAC also predict that it will increase, thereby highlighting the importance of zoning allocation decisions for the area to the south-west of the airport.
20. It would be sensible to include the land to the SW now to avoid incompatible development occurring. It would also provide the Airport and the public with assurance that, for the predominant take-off area, the hazards relating to air transport are being identified by the Council and are being appropriately managed. The safety of persons on the ground would then be enhanced with this inclusion to the Structure Plan area.
21. To provide for the appropriate level of safety along the predominant take-off path, and to accommodate the aircraft noise arising from take-offs and landings to the south-west, it is critical that land uses and zoning are considered as part of the current structure planning for that land beneath the 55dB Ldn. This strategy will avoid confrontation arising from the absence of proper planning, and would prioritise the land use needs of the Airport as a critical element of a growing city.
22. In the evidence for the Unitary Plan hearings, Mr Dave Park (aeronautical specialist) noted that, based on Land Use Planning Guidelines and data from throughout the United States, the ultimate result from reverse sensitivity issues arising from incompatible uses near an airport is the closure or relocation of the airport. NSAC and Mr Park have previously advised the Council that there are no alternative sites available for an airport to the north of Auckland within a suitable distance to the urban population. The absence of any alternative sites highlights the strategic importance and value of the North Shore Airport as a key “supporting growth” infrastructure asset.
23. Inclusion of land subject to the Airport Noise Overlay within the Structure Plan area will ensure that only compatible uses are provided for in an area that is arguably most affected by airport operations.

Strategic Context

24. NSAC notes that the Airport Topic Report provides a good analysis of the airport's relevance to the Auckland Plan. The Auckland Plan provides direction to protect critical transport infrastructure such as North Shore Airport. NSAC confirms that the Airport is poised to offer a significant regional contribution to the regional transport economy by providing further and more frequent air connections. In this context, the connections to and from the Airport should be managed as a 'single transport system', and be integrated with any upgrades to the regional road network.
25. The Future Urban Land Supply Strategy has identified the Silverdale West Dairy Flat business land subject to the structure planning as being ready for development in the period 2018-2022. As noted in other NSAC submissions, this timeframe has considerably shortened the time that the Airport would have had to work with the Council and other parties to plan the Airport's future development. The future contribution of the Airport to the regional economy, transport systems, and infrastructure, must not be squandered by any lack of resources available in the condensed timeframe. To this end, any statutory mechanisms to protect the future expansion of the Airport should be identified during the Structure Plan process to avoid missed business and air transport opportunities, and provide the necessary infrastructure for a growing city.
26. The Airport Topic document provides a good outline of the relevant sections of the AUP applying to the Airport. What is not mentioned is the hierarchical nature of the policy framework, where the Regional Policy Statement (RPS) sits at the top and the district plan provisions (including the Airport Approach Surface Overlay and Aircraft Noise Overlay, zone and precinct provisions) give effect to the policy statement.
27. Therefore, when preparing the Structure Plan, the resulting overlays, zones, and precincts applying to the structure plan area must give effect to the RPS. The transport and infrastructure RPS policies provide for the '*identification and protection of existing and future areas and routes for developing Auckland's transport infrastructure*'. The Structure Plan will be the pre-cursor document to the Council-proposed Plan Change for the Dairy Flat area. In order for the Plan Change to satisfy the statutory injunction "to give effect to", it is important that the Structure Plan be aligned accordingly.
28. The Airport Topic document should also record that, under the Structure Plan Guidelines at Appendix 1 of the AUP, a structure plan must also '*integrate land use and development with the local and strategic transport networks*' (Section 1.4.6(1)). This would include air transport. Under Section 1.4.7 Infrastructure of the Structure Plan Guidelines, the following matters are noted, which are also not detailed in the Airport Topic Report:

(1) *The location and protection of existing and planned infrastructure, including network infrastructure corridors.*

(2) *The location, scale and capacity of existing and new infrastructure to serve the structure plan area.*

These matters are considered important to the future structure planning process.

Civil Aviation Act 1990

29. The Topic Document outlines the guidance that the Civil Aviation Authority has produced and the Civil Aviation Rules that relate to land use planning. It mentions the use of runway protection zones (RPZ) as a way of protecting people and property on the ground. The CAA Guidance Material for Land Use at or Near Aerodromes June 2008 states:

"Land use within the RPZ is generally restricted to such land uses as agricultural, golf course, and similar uses which do not involve congregations of people or construction of buildings or other improvements that may be obstructions. Land uses prohibited from the RPZ are residences and places of public assembly including churches, schools, hospitals, office buildings and shopping centres."

While the Topic Document also details that no runway protection zone rules have been put forward by the CAA or Councils to date to constrain land use in this way, NSAC strongly agrees with the use of RPZ's as a way of sustaining the long-term future of the Airport, the safety of aircraft operations, and people on the ground. The RPZ dimensions are determined by the aircraft approach speed and runway approach type.

30. With the current rural land uses bordering the Airport, NSAC has not needed to contemplate the use of such a tool. With the urbanisation of land around the Airport, any future structure planning should provide an RPZ. NSAC submits that the RPZ for North Shore Airport should be provided beyond the end of each runway and have the following dimensions:
- Inner width 150m
 - Outer width 303m;
 - Length 510m.

The locations for the RPZ's are shown on the attached diagrams at **Figure 1**, with the RPZ's for runway 03/21 and runway 09/27 are depicted in blue and green respectively. **Figure 2** depicts the location of the RPZ for the proposed extension to Runway 03/21 in red.

31. In accordance with relevant guidance and best practice, it is critical that within the RPZ's, parks, playing fields, golf courses and other compatible land uses are established so that in the event of engine failure, or other emergencies,

potential landings sites are available. This will minimise the risk to persons and property on the ground. The RPZ will provide for:

- a) The type of aircraft that an expanded airport would accommodate;
- b) Allow for approach visibility minima with precision instrument approach operations.

Constraints and Opportunities

32. The Airport Topic document (page 15) refers to the 'Lack of certainty about airport expansion plans' as a constraint in relation to the Structure Plan area. The Airport's Master Plan has been under internal review with the advent of the PAUP process, FULSS and now the Structure Plan. Accordingly, NSAC have not finalised their review of the Master Plan for the Airport due to the reciprocal lack of certainty in the Structure Plan. However, runway expansion plans that NSAC considers meets the needs of Auckland, with respect to a functional regional airport, would entail an approximate 500 metre extension of the current main (03/21) runway to enable 50 seat aircraft to access the Airport, bringing the Airport up to Code 3C instrument category.
33. An extension of this length would enable the Airport to function and serve as a viable regional facility, providing air transport and freight to most regional locations within New Zealand. Larger aircraft are a necessity as public perception deems larger aircraft to be safer aircraft. Larger aircraft in the 50-seat territory are also of large enough scale to operate with financial efficiency on longer regional routes, with the speed to make travel times competitive with services from Auckland International Airport.
34. Such an expansion proposal presents a unique opportunity by enabling the provision of a regional airport to serve a growing Auckland. Providing the public with a regional air transport alternative to Auckland airport will drive significant economic growth to the area, and feed into the airport-related business hub, already identified as an opportunity.
35. The most significant opportunity that this regional transport option would provide is the savings in time and travel costs to currently 500,000 people who live closer to North Shore Airport than Auckland International Airport, for accessing regional flights. This number of people is expected to grow to approximately 1 million in the next 30 years using population projections from Statistics NZ. These travel and time savings also assist in relieving traffic volumes accessing Auckland International Airport, and providing landing slots for smaller aircraft displaced from Auckland Airport.
36. Additionally, these economic benefits do not account for improvements in freight volumes and flight times to the rest of NZ; tourism opportunities for the Hibiscus coast and the Northern Auckland area; and an increase in private aircraft movements and pilot training.

37. It is therefore considered that the following should be included in the Topic Document as an additional opportunity:

- Expansion of North Shore Airport to provide a regional transport facility.

BACKGROUND REPORT

Structure Plan Area

38. The first aspect of concern in the Background Report is the location and extent of the Structure Plan Area. As detailed under paragraphs 17-22, extension of the Structure Plan area beneath the 55dB Ldn noise contours, particularly to the south-west, will enable a proper consideration of compatible uses for an area that is highly affected by airport operations. While it is acknowledged that a future plan change could consider this area, there is a strong planning logic to considering this area now, to ensure that the Airport's current operations and future potential are not compromised by piecemeal urban development. In addition, there is a community expectation that the Future Urban zoned areas, outside the current Structure Plan area, will be zoned for residential purposes in the future. This places a difficult burden on the Airport to continually re-align these expectations for those areas affected by airport operations, whereas consideration under the current process will allow a clear understanding to be obtained by all parties of the reverse sensitivity issues facing these areas.
39. A further aspect to be considered, regarding the location of the Structure Plan area is that, as a regionally significant transportation infrastructure asset, the Airport's location will drive and influence the zoning decisions for the surrounding area. Given this, it should be treated as an integral part of the Structure Plan area, so that appropriate consideration can be given to all the effects that the Airport will have on land development.
40. An example of where the analysis to date may have resulted different conclusions if the Airport were within the Structure Plan area, is the detail within the Landscape Topic Report. This Topic Report refers to landscape mitigation measures recommended for the Silverdale West Area (page 8), and includes *"a planted interface with tall trees along the eastern edge of the structure plan area (adjacent to State Highway 1) providing filtered views to assist in integrating the development into the wider landscape when viewed from the motorway"*. If the Airport had been part of the Structure Plan area, the author would have assessed the landscape with the footprint of the Airport, and its wider influence, in mind. A different mitigation measure would have been identified than a 'planted interface with tall trees'. In this case, the obstacle limitation surfaces projecting from the northern end of Runway 03/21 (the 'main' runway), not to mention the turbulence caused by trees, need to be

considered. The predominant approach and take-off path for aircraft coming into land imposes height limits for tall trees in this area.

41. Other conclusions, within the Constraints and Opportunities section of the Landscape Topic report, may also have been different if the Airport was part of the Structure Plan area. The visual landscape from the air would come into play, also consideration of the obstacle limitation surfaces at the southern end of Runway 03/21 (main runway), and for Runway 09/27 (the cross-wind runway).
42. Similarly, another notable lack of consideration for the Airport's location and its influence on surrounding land uses is found within the Business Land Topic Report. As a result of the Airport's exclusion from the Structure Plan area, the Airport is not mentioned, either as an influence on: the types of businesses that can locate in close proximity to the airport; or as a driver for business (by creating quicker transport pathways to the rest of NZ, and thereby increasing economic competitiveness and productivity).
43. It should be noted at Page 11 of the Business Land Topic Report that the provision of business land within the Structure Plan area would help manage conflicts between incompatible activities (being activities incompatible with aircraft operations). Therefore, the sentence analysing the RPS objectives should be altered to state:

*"The provision of business land in this location would conform to many parts of these RPS objectives, such as meeting current and future demands for commercial and industrial opportunities, promoting economic development, **and be generally compatible with airport operations.**"*

44. Furthermore, it should be noted at Page 12 that efficient access to freight routes also includes the Airport. Only SH1 is mentioned, revealing a limited remit around 'land transport' planning.
45. If the Airport is incorporated within the Structure Plan area, the constraints and opportunities section of the Business Land Topic Report would recognise the opportunity for business land being close to the Airport, recognise its future potential as a business/transport hub, and also its influence on adjoining land uses.
46. Given the omission of the Airport as a consideration that has influences on business land issues, the sensible and simple way to ensure that the Airport is given its due consideration in this context, is to include it within the Structure Plan area.
47. This proposition is also supported by the Structure Plan guidelines found at Appendix 1 of the AUP. Section 1.2 promotes the preparation of structure plans to support **any** of the following:

"(1) identifying greenfield land suitable for urbanisation;

- (2) rezoning of existing urban areas for more intensive uses or for **comprehensive redevelopment**;
- (3) rezoning of Future Urban Zone land for urbanisation; and
- (4) establishing new or significantly expanding existing rural and coastal towns and villages."

Under these guidelines, land does not need to be subject to a Future Urban zone in order to be the subject of a Structure Plan.

Auckland's Growth Challenge

- 48. It is appropriate to note that providing for an extra 550,000 – 1,100,000 population increase (out to 2046) requires transportation connections. Air travel is a vital component of all modern transport systems. Access to air transport options is expected in today's society and is a key enabler for any region. Structure planning should therefore protect Auckland's limited ability to provide air transport access to a significant portion of its population.
- 49. In comparison to other major cities, Auckland will reach crisis point prior to 2040 (we estimate 2036) with the absolute need for a second airport with the capacity to handle passenger volumes in the millions. Looking at some other cities around the world:
 - a) Sydney has 1 major Airport with 3 runways collectively handling 42.6 million passengers per annum;
 - b) London has 5 major airports with a combined 6 runways collectively handling 153.8 million passengers per annum.
 - c) New York has 3 major airports with a combined 9 runways collectively handling 127 million passengers per annum.

Analysis shows that an average of 38.5 million passengers are handled per major airport and 17.9 million passengers handled per runway.

- 50. Looking at airport expansion plans, recent and well popularised headlines tell us that London Heathrow is building another long-anticipated runway, New York La Guardia is being essentially rebuilt from the ground up, New York John F Kennedy is planned to be heavily redeveloped, and construction is about to begin on Sydney West Airport.
- 51. Auckland International Airport are predicting 40 million passengers per annum by 2040 with their second runway operational. With 40 million passengers per airport and 20 million passengers per runway by 2040, these figures put Auckland in a more heavily restricted position than any of the cities previously mentioned. Auckland will be in crisis by the mid-2030's and certainly by 2040 if a second regional airport is not available and operational with capacity to handle significant passenger numbers.

Opportunities and Constraints

Transport

52. In relation to the Transport section of the Opportunities and Constraints section of the Background Report, NSAC is very concerned that the transport aspirations and proposed transportation network that has been identified thus far does not include air transport. It is disappointing that the Supporting Growth transport concept diagram, displayed at Figure 5 in the report, omits to show the Airport, where it is a key element of the transport network.
53. Accordingly, the Council needs to take a lead role in the Structure Plan work by directing AT and NZTA to acknowledge that the transportation network must include the Airport as a future key connection within the network. The Council also needs to consider how the features of the network, will incorporate the Airport. This particularly applies to:
- The Rapid Transit Network
 - The new north-south connection between Albany and Orewa
 - The new and upgraded east west connections, including Wilks, Kahikatea Flat, Pine Valley, and Awanohi Roads
 - Implementation of a cycle network.
54. It is therefore recommended that the Airport representatives be part of “Key Stakeholder” workshop planning for the proposed transport network to ensure that the network routes take appropriate account of:
- The airport approach paths and runway protection zones, both current and future.
 - The proposed location of the main Runway 03/21 across Postman Road.
 - The integration of the Airport with Park and Ride, the motorway network, and the development of the airport as a significant regional transport hub.
55. It is essential that NSAC’s input be provided when the ITA is prepared for the Structure Plan.

Water and Wastewater Servicing

56. The indicative Water Servicing plan at Figure 9 shows the conceptual location of a trunk pipeline from Albany and bulk supply points along that pipeline. NSAC is concerned that the location of the pipeline along Postman Road, and the bulk supply point at the southern edge of the Structure Plan area may impact on the current operation and future functioning of the Airport, depending on the design and robustness of the servicing system. For example, if the bulk supply point is a large reservoir, this may be either complementary, or detrimental, to the

Airport's operations, depending on its location and design. The conceptual location may interfere with an extended runway location; however this can only be determined with careful discussion between the designers of the servicing network. Generally, the location of water/wastewater bulk infrastructure close to the airport is seen as positive, as it provides a complementary use within approach paths, provided the utility does not protrude beyond the obstacle limitation surfaces, produce smoke, dust and steam, or provide a location for dangerous substances, that may interfere with the safety of aircraft.

57. Bearing this in mind, the wastewater network modelling study should consider that synergies can be achieved by planning appropriate wastewater infrastructure close to the Airport. Such co-locations should be factored into the wastewater modelling.
58. Given the above, consultation with Airport representatives is critical to ensure that the needs of both infrastructure providers (being Watercare and NSAC) can be met.

Natural Character, Landscape and Visual

59. As stated in paragraphs 37 and 38, inclusion of the Airport within the Structure Plan area is important to address the visual mitigation of development within the area. It is agreed that the critical matters to address in the Structure Plan are the area's interface with SH1, and the need to visually 'break up' the appearance of development when viewed from an elevated perspective, as this 'elevated perspective' also includes views from the air. With an increase in air movements over time and expansion of the Airport, the air approaches and circuit patterns surrounding the Airport will provide the first visual exposure for many people to the landscape qualities of the area. Accordingly, innovative precinct provisions could be conceived to address the visual impacts of development and buildings from the air.

Open Space and Recreation

60. It is noted that the location of the Structure Plan business land may offer opportunities for inclusion of a 'Special Zone' for major recreational facilities. It is suggested that the location of the Airport could act as a 'gateway' to the location of these facilities, particularly as a regional air transport facility, where national competitions and events could be easily accessed and serviced from the Airport. Therefore the "Special Zone' could be close to the Airport and other aligned transport services (such as Park and Ride, rapid transit).
61. Any large open space provision could be dovetailed with the needs of the Airport, particularly on the runway approaches, as many open space uses are considered complementary to the Airport use, being:
 - Gardens;
 - Cemeteries;
 - Golf courses;

- Riding academies;
 - Large playing fields (not within a stadium, or having seated capacity).
62. The greenways could also be located in areas sensitive to aircraft operations, and provide connections for walking and cycling past the Airport.
63. Overall, it is considered that this section of the Background Report needs to address how the provision of open space can mesh with the needs of the Airport, so that the location of open space is appropriately identified under the Structure Plan.

Business Land

64. This section should record, at Page 38, that the business land would benefit from the location of a regional airport in the vicinity. It should also note that, in addition to the area required for road reserves and flood protection, some land will be required to protect the Airport operations and its future importance as a regional transport hub.

Airport

65. NSAC supports the conclusions of the Airport section of the Background report regarding that the Structure Plan process needs to consider the effects on the Airport and the effects of the Airport on future land uses. NSAC has endeavoured to alert the decision makers in the past that the Airport is an important infrastructure asset that cannot be replaced. As noted, the Airport's strategic location and established investment can make a significant contribution to the economic and social well-being of a major section of Auckland's population.
66. NSAC submits that the expansion of the airport is a necessity, given that North Shore Airport is the only viable airport site north of Auckland, and given the long-term population growth of the Auckland area. It also sees it as an opportunity that needs to be protected for the future of all Aucklanders. NSAC is also open to entering into a partnership relationship with the Council to explore and develop these proposals.
67. In the meantime, the structure planning must allocate appropriate and complementary zones surrounding the Airport, so that the opportunity of the Airport to become a regional transport hub is not foreclosed.

Silverdale West Dairy Flat Business Area Structure Planning Issues and Concepts

68. It is noted that the CAA regulations are missing from the list of statutory and non-statutory requirements for structure planning. The CAA rules manage the safe and effective use of airspace, which is relevant to the structure plan area surrounding the Airport. The Obstacle Limitation Surfaces and Wildlife Hazard Management procedures are CAA requirements that are particularly relevant.

69. Under Section 6.2.1 (Transport, movement networks) the movement network needs to include walking, cycling, public transport, road and **air** travel within the Structure Plan area, and/or links to air travel. Air transport is a unique part of this Structure Plan area that should not be omitted. It needs to be given priority status as an integral and key part of the transportation network.

70. It is recommended that the Vision for the Silverdale West Dairy Flat Business Area be enhanced to state:

*The Silverdale West Dairy Flat Business Area provides the wider Silverdale Wainui Dairy Flat future urban area and the sub-region, with employment opportunities which meet current and future demands, in a quality low impact built environment, **while taking into account the existing operation and future expansion of North Shore Airport.***

71. The above addition to the vision would appropriately prioritise the Airport as a significant driver of zoning allocation decisions for the Structure Plan area.

72. Under the Key Themes and Objectives for Business at Section 6.3.2 of the Background Report it is suggested that the objective regarding North Shore Airport be added to as follows:

*"Development does not result in reverse sensitivity effects that compromise the ongoing operation **and future expansion** of the North Shore Airport."*

This addition would then appropriately give effect to the RPS objectives and policies regarding infrastructure.

73. Under Theme 3 Connections, to ensure air transport is considered as part of the connection system for the area, the following additions to the Objectives are recommended as follows:

- The transport networks **(including air)** respond to anticipated growth by providing efficient, resilient and safe connections, including for freight, within the Silverdale West Dairy Flat Business Area, to the adjoining future residential areas, **North Shore Airport**, and to the wider Auckland region.
- Frequent, reliable and attractive public transport options are provided by enhancing network connections to support the growth in the business area along key transport routes **and North Shore Airport as a regional transport hub.**

74. It is considered that the Objective under Theme 4 – Infrastructure should mention that a significant aspect of any public infrastructure in this area is to service areas beyond the Structure Plan area, by providing through-routes north and south, for example. As a significant transport asset for the area, the Airport

is part of this wider picture. Therefore, the objective should be re-worded as follows:

- Timely and phased public water, waste water and transport network infrastructure meets the growing needs of the Silverdale West Dairy Flat Business Area, **and the wider community where servicing meets regional needs.**
- **The development, operation, and upgrading of North Shore Airport as a regional transportation asset is enabled.**

CONCLUSION

75. By comparing to other cities around the world by population and the number of airports serving those cities, Auckland will need another airport by 2040. This takes into consideration the second runway at Auckland International Airport. The structure planning of the business area needs to ensure that the expansion opportunity for North Shore Airport is not foreclosed.
76. NSAC requests that the above feedback be accepted by the Council and followed up accordingly. NSAC looks forward to collaborating closely with the Council and infrastructure providers to ensure that the next phase of the Structure Plan process provides for the unique location and opportunity afforded by North Shore Airport.

Signed for and on behalf of North Shore Aero Club:



Kaaren Rosser
Senior Planner

1958 BACK SUB

■ **Annexure 3**

**SUBMISSION ON THE
DRAFT AUCKLAND PLAN 2050**

SUBMITTER DETAILS:

1. Name: North Shore Aero Club
2. Address for Service:
Postal: C/- Haines Planning
PO Box 90842
Victoria Street West
AUCKLAND 1142

Email: kaaren.rosser@hainesplanning.co.nz
3. Contact Person: Kaaren Rosser
Senior Planner
Haines Planning
4. Date of Submission: 28 March 2018

SCOPE OF SUBMISSION:

5. Property Address: North Shore Airport, 270 Postman Road, Dairy Flat 0794
6. This submission relates to the Draft Auckland Plan 2050 in its print version, owing to the difficulty of referring to web pages.
7. One aspect of the consultation which must be commented upon before referring to the detail of the documents is that the website needs to be more user friendly to find the print version easily from the circular and confusing web pages.
8. It is also considered that having the 10 year Budget mixed up with the Auckland Plan is unhelpful. It creates significant challenges to review all the information in order to find the detail amongst the Auckland Plan information.

9. Furthermore, the time available to review two such important documents is not considered to be sufficient, also considering the amount of information to be reviewed.
10. The following aspects of the Auckland Plan 2050 planning consultation documents are discussed in the submission below and the tabular attachment which refers to amendments sought to individual clauses:
 - a) The location of North Shore Airport and its strategic importance;
 - b) Broad comments on the draft Auckland Plan;
 - c) Matters within the Transport and Access Outcomes;
 - d) Matters within the Opportunity and prosperity Outcomes;
 - e) Matters within the Development Strategy.

INTRODUCTION:

11. North Shore Aero Club (“NSAC”) owns and operates the North Shore Airport located at the centre of the Future Urban zoned land at Dairy Flat. The airport has its own Special Purpose – Airport zone under the Auckland Unitary Plan.
12. It is situated almost immediately adjacent to the Northern Motorway, allowing direct transport links to the Hibiscus Coast, the North Shore, and suburbs north of the Waitemata harbour. Currently, 500,000 people within Auckland live closer to North Shore Airport than Auckland International Airport. This number of people is expected to grow to approximately one million in the next 30 years using population projections from Statistics NZ.
13. NSAC currently has 545 members and 185 aircraft whose home base is North Shore Airport. Approximately 200 people are employed at the Airport. It runs a highly successful flight training school. It services commercial passenger flights to smaller destinations such as Great Barrier Island and Kaitaia. It is the home to a number of emergency services, including Northland Emergency Rescue and flying doctor services.
14. The functions and strategic importance of the Airport will inevitably grow in the future. The current Auckland Plan provides direction to protect critical transport infrastructure such as North Shore Airport, however the Draft Auckland Plan 2050 appears to ignore, or refer only in passing to air transport. NSAC confirms that the Airport is poised to offer a significant regional contribution to the regional transport economy by providing further and more frequent air connections. In this context, the draft Auckland Plan 2050 should enable this possibility and provide for the Airport as part of its development strategy.
15. NSAC has previously submitted to the Future Urban Land Supply Strategy and the Silverdale West Dairy Flat Business Area Structure Planning

Consultation Documents. These submissions outline the constraints and growth opportunities for the Airport with respect to future urban areas surrounding the Airport, and they provide useful background information regarding airport operations. These submissions are **attached** at Annexure 1 and 2.

16. The following paragraphs refer to broader Auckland Plan issues and wording used within the Plan. It is discussed overall, and then by Chapter. Proposed changes to the wording of the Plan are **attached** in the Table at Annexure 3.

Overall

17. The Draft Auckland Plan 2050 lacks mention of air transport and services overall. There is no, or very little, mention of how the region is served by air transport as part of the transport strategy. Most of the maps do not show the locations of the currently rural airports.
18. The previous Auckland Plan (2012) was more specific and identified air as part of the wider transport and business strategies. It also identified the smaller airports and listed them as critical infrastructure. The Plan also specifically stated under the Transport chapter:

Additionally, we will protect the operations of our smaller airports such as Ardmore and Dairy Flat, (currently used for recreation), as they can provide a flexible alternative for future freight movements. Whenuapai Airbase is expected to continue its defence operations.

19. The Auckland Plan is required, under Section 79 of the Local Government (Auckland Council) Act 2009, to provide a spatial plan (being the draft Auckland Plan 2050) to:

identify the existing and future location and mix of—

- (i) residential, business, rural production, and industrial activities within specific geographic areas within Auckland; and*
- (ii) critical infrastructure, services, and investment within Auckland (including, for example, services relating to cultural and social infrastructure, transport, open space, water supply, wastewater, and stormwater, and services managed by network utility operators);*

20. The draft Auckland Plan does not mention North Shore Airport in this context. The submitter is therefore uncertain how North Shore Airport is considered under the future growth of Auckland identified by the Plan, and how this uncertainty translates into future aligned policies and plans that the Auckland Plan feeds into.

21. The following submission and attachments address this imbalance and seek relief by the inclusion of North Shore Airport where relevant. The Airport is significant regional infrastructure that cannot be replaced, and has particular operational requirements.
22. It is also suggested that the omission of air from the Plan is due to Auckland Transport having a statutory obligation under the Local Government (Auckland Council) Act 2009 to undertake land transport functions. This does not allow it to coordinate with air and sea providers, which creates flaws in regional transportation strategies as identified.
23. Amendments to relevant statutes may be required so that the whole transport sector can be recognised and provided for in an integrated manner.
24. NSAC has also identified that, within the horizon identified by the Plan, the northern areas of Auckland will require a regional airport to service the increased population. This needs to be identified and provided for within the Auckland Plan document. As such, the following statement should be provided for in the Plan:

The operation, development, and upgrading of North Shore Airport as a regional transportation asset is enabled.

About Auckland and the Role of North Shore Airport

25. Under Auckland's Role in New Zealand – Transport inter-connectedness section, the inter-connectedness of Auckland to the neighbouring regions is highlighted by Map 12. This map omits North Shore Airport as a connection within the regions and therefore the map needs to be amended to provide its location in this context (see Figure 1 below). Ardmore Airport should also be shown.
26. The depiction of North Shore Airport on the map reflects its existing connections with the outlying regions (Salt Air and Great Barrier Air run regional services), but also its future role in connecting the regions as explained below.
27. This section of the draft Auckland Plan also talks about Auckland Airport in the regional context and states that there are operational pressures on Auckland Airport due to the rising passenger and cargo numbers. While Auckland Airport is proposing to expand to cope with this demand via a second runway, there is a role for North Shore Airport to complement this demand for regional air transport, and provide non-competing services to smaller regional centres, together with trunk routes.

28. The Airport can become a fully functioning regional airport, to meet the needs of Auckland, with an approximate 500 metre extension of the current main (03/21) runway. This would enable 50 seat aircraft to access the Airport.

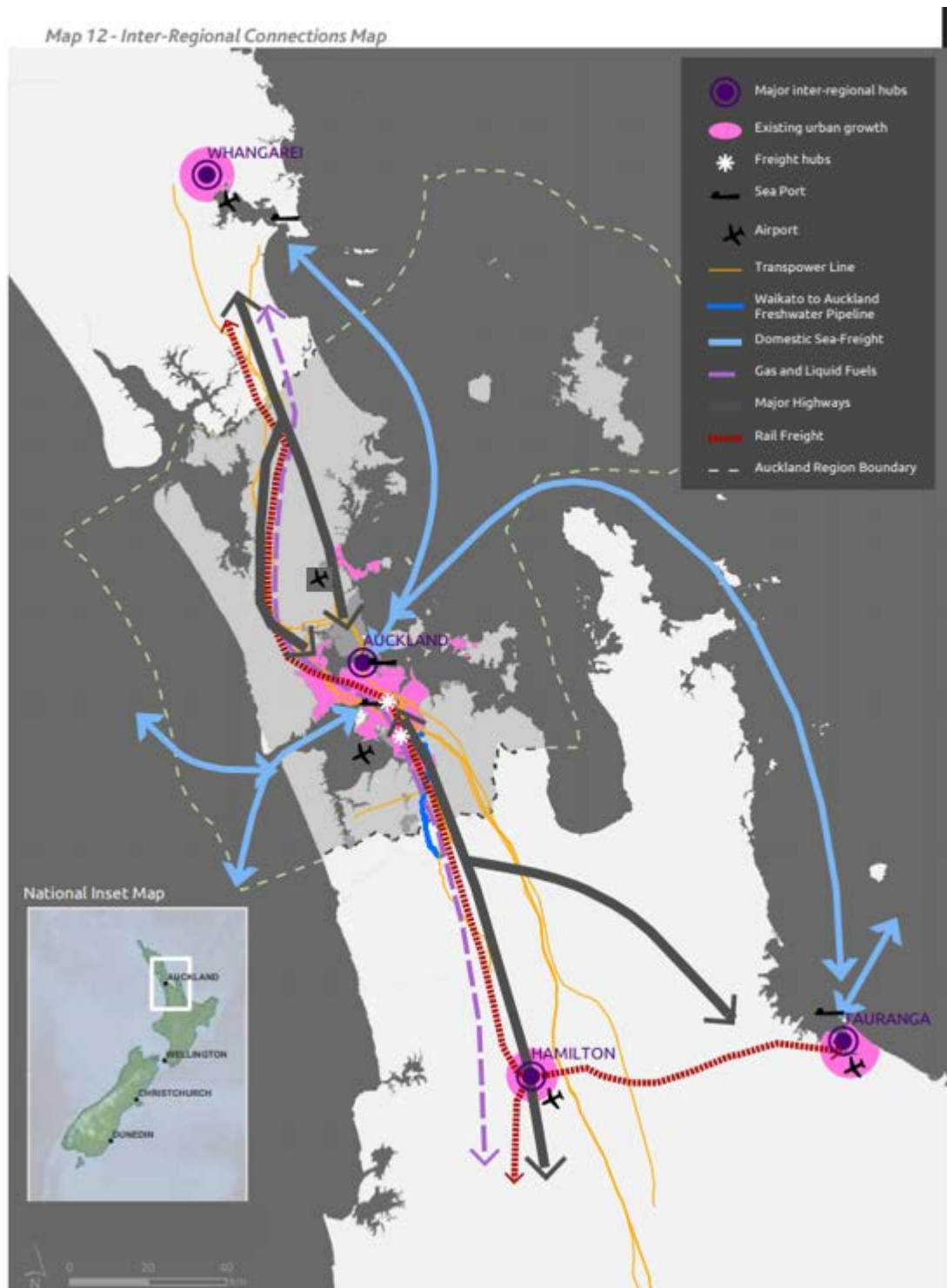


Figure 1

29. An extension of this length would enable the Airport to function and act as a viable regional facility, providing air transport and freight to most regional locations within New Zealand. 50-seater aircraft are perceived to be the size

of aircraft that are safe by the public and are also large enough to operate with financial efficiency on longer regional routes, with the speed to make travel times competitive with other services from Auckland International Airport.

30. Such an expansion would provide the public with a regional air transport alternative to Auckland Airport that would save time and travel costs to currently 500,000 people who live closer to North Shore Airport than Auckland International Airport. This number of people is expected to grow to approximately one million in the next 30 years using population projections from Statistics NZ. These travel and time savings also assist in relieving traffic volumes accessing Auckland International Airport. North Shore Airport can also provide landing slots for smaller aircraft displaced from Auckland Airport.

Auckland's Population - Living With Nature

31. Under this section at Page 16 the scenario does not mention what happens to Auckland Airport under a future climate change scenario. If the ability to fly is still available under the new climate change model, Auckland Airport may need to be re-evaluated given its location at 5m above sea level.
32. The North Shore Airport is situated at +63m above sea level. It is not subject to flooding, or other natural hazard risks, and is therefore capable of being a resilient and crucial air transport link.

Outcome: Transport and access

33. NSAC welcomes the Directions in this section as stated on page 100. An integrated transport system, that includes air, is vital to the future health and prosperity of Auckland. NSAC also considers that North Shore Airport is part of the picture to increase genuine travel choices for a healthy, vibrant and equitable Auckland. As Auckland grows there will be increasingly unequitable access to regional flight choices for those areas north of the Harbour Bridge. The proposed train connections to Hamilton and Tauranga stop at Auckland city centre, and light rail to the North Shore and beyond is not given priority in the Plan. It will be increasingly expensive and timely to access Auckland Airport to engage in regional business or recreation.
34. North Shore Airport must be provided with the policy support to ensure that the opportunity for it to become a viable regional airport, servicing towns and cities within the NZ is not foreclosed. Its strategic location north of the City and its connections to the strategic transport network is irreplaceable. Its ability to provide a critical link for regional air transport must be recognised and enabled through the Auckland Plan.

35. Furthermore, it is part of the answer for Focus Area 1, where making better use of the existing networks must include upgrading and partially expanding North Shore Airport to take advantage of its strategic location and ability to improve the efficiency of Auckland's transport network.
36. An upgrade of North Shore Airport would also provide part of the answer to addressing inequitable access to air travel under Focus Area 2. As Auckland grows the North will be less well served in terms of the distance and cost to access regional air travel. North Shore Airport can provide some balance to this problem if investment is undertaken to expand the Airport.
37. To ensure that an expansion of North Shore Airport is a possibility, the policies of the Plan outlined under Focus Area 5 are crucial to ensure that when the nearby Future Urban land is structure planned, land use and the air transport decisions are integrated. A future expansion of the Airport must be signalled at this point to allow integration to occur.
38. It is considered that the Council needs to take a lead role in the Structure Plan work by directing AT and NZTA to acknowledge that the transportation network must include the Airport as a future key connection within the region's network. The Council also needs to consider how the features of the network will incorporate the Airport. This particularly applies to:
 - a) The Rapid Transit Network;
 - b) The new north-south connection between Albany and Orewa;
 - c) The new and upgraded east west connections, including Wilks, Kahikatea Flat, Pine Valley, and Awanohi Roads;
 - d) Implementation of a cycle network.

Outcome: Environment and cultural heritage

39. The directions provided in this part of the Plan appear to conflict when read together, particularly when applying them to development such as air infrastructure.
40. For example, if the Airport were to be expanded, the immediate area of the runway extension would not serve to 'protect and enhance Auckland's environment'. However, if the costs and pollution caused by congestion getting to Auckland Airport were taken into account, then the Airport expansion might be seen as protecting the wider environment.
41. One way of ensuring that Auckland's air infrastructure is future-proofed is to ensure that North Shore Airport is given the space to expand when the opportunity is available. As it sits 63m above sea level, it can become a vital lifeline to Auckland under any climate change scenario.

42. Any future development at the Airport will focus on sustainable design as much as possible, and a future airport is likely to see green infrastructure (subject to designing for minimal bird interference) incorporated into buildings and areas beyond the runway, and taxiways. Air technology is moving very quickly and more sustainable ways of providing air transport are evolving.
43. It should also be noted that the provision for public open spaces (to provide good environmental outcomes for urban growth) could be provided hand in hand with the existing and/or future expanded Airport. Synergies could be achieved, for example, to create a farm park southwest of the Airport that would provide appropriate open space on the ground while protecting flight take-off and landing paths.

Outcome: Opportunity and prosperity

44. Direction 1 at Page 155 details innovation and entrepreneurship as essential elements for increasing employment. North Shore Airport and the upcoming business zoned land on its doorstep are ideally suited to establish a business hub as part of the multi-modal approach outlined in the Development Strategy. The Airport would be at the centre of the hub and provide transport services, and collaborate for new technologies. It should be noted that the Airport is home to some existing air technology businesses, including one that has developed carbon fibre helicopters.
45. North Shore Airport also has a part to play under Focus 4 where it could provide regional tourism services in the future. It could also secure freight needing quick access to the Auckland market.

The Development Strategy

46. While the boundary locations of the Future Urban zoned areas have been defined by the Auckland Unitary Plan processes, their areas as shown by the maps within the Development Strategy should indicate the location of the Airport given it is a significant driver to the types of development that can be established in the vicinity.
47. The development strategy is also short on detail and focuses more on existing urban areas in the supporting information rather than defining what future urban areas should aspire to. In this sense there is no vision for these outlying RUB areas, where the provision of larger social (e.g. universities) and transport infrastructure has not been thought about in the wider Auckland context. This means that entities, such as NSAC, will be left without direction over the priorities for the whole of the Auckland area when the structure planning (which will fine-grain the zoning) are carried out.
48. NSAC strongly considers that future expansion of the Airport should be listed as an infrastructure project in the Development Strategy to protect the

potential of the Airport in providing a vital regionally significant infrastructure role in a growing Auckland.

CONCLUSION

49. Comparing the per capita relationship between population and the number of airports serving international cities, Auckland will need another airport by 2040. This takes into consideration the second runway at Auckland International Airport. The draft Auckland Plan needs to acknowledge and provide for this necessity and signal the expansion of North Shore Airport as an infrastructure project that will require shared investment by the community of Auckland. Without such recognition in the Auckland Plan the opportunity to provide needed air infrastructure will be foreclosed as future urban areas around the airport are developed.
50. NSAC requests that the above feedback be accepted by the Council and that the draft Auckland Plan 2050 be amended accordingly. NSAC looks forward to collaborating closely with the Council to ensure that the unique location and opportunity afforded by North Shore Airport is taken forward.
51. NSAC would like the opportunity to speak to the relevant Council committees concerning this submission.

For and on behalf of North Shore Aero Club:



Kaaren Rosser (BSc, Dipl Nat Res, CertPlan)
Senior Planner

1958 AP SUB

■ Annexure 4



**SUBMISSION ON THE
10-YEAR BUDGET**

SUBMITTER DETAILS:

1. Name: North Shore Aero Club
2. Address for Service:
Postal: C/- Haines Planning
PO Box 90842
Victoria Street West
AUCKLAND 1142

Email: kaaren.rosser@hainesplanning.co.nz
3. Contact Person: Kaaren Rosser
Senior Planner
Haines Planning
4. Date of Submission: 28 March 2018

SCOPE OF SUBMISSION:

5. Property Address: North Shore Airport, 270 Postman Road, Dairy Flat 0794
6. This submission relates to the 10-year Budget in its print version.
7. The following aspects of the 10-year Budget consultation documents are discussed in the submission below:
 - a) The infrastructure needs of Auckland and how a future North Shore Airport responds to these needs;
 - b) Issue 1: Transport – where delivery of air transport is part of the picture;
 - c) The Regional Land Transport Plan;
 - d) The Draft Infrastructure Strategy as part of the supporting information.

INTRODUCTION:

8. North Shore Aero Club (“NSAC”) owns and operates the North Shore Airport located at the centre of the Future Urban zoned land at Dairy Flat. The airport has its own Special Purpose – Airport zone under the Auckland Unitary Plan.
9. It is situated almost immediately adjacent to the Northern Motorway, allowing direct transport links to the Hibiscus Coast, the North Shore, and suburbs north of the Waitemata harbour. Currently, 500,000 people within Auckland live closer to North Shore Airport than Auckland International Airport. This number of people is expected to grow to approximately one million in the next 30 years using population projections from Statistics NZ.
10. NSAC currently has 545 members and 185 aircraft whose home base is North Shore Airport. Approximately 200 people are employed at the Airport. It runs a highly successful flight training school. It services commercial passenger flights to smaller destinations such as Great Barrier Island and Kaitiāia. It is the home to a number of emergency services, including Northland Emergency Rescue and flying doctor services.
11. The functions and strategic importance of the Airport will inevitably grow in the future. NSAC confirms that the Airport is poised to offer a significant regional contribution to the regional transport economy by providing further and more frequent air connections. In this context, the 10-year budget is important, as this is where NSAC sees the Council enabling this possibility and providing for the Airport as part of its development and infrastructure strategy.
12. NSAC has previously submitted to the Future Urban Land Supply Strategy and the Silverdale West Dairy Flat Business Area Structure Planning Consultation Documents. These submissions outline the constraints and growth opportunities for the Airport with respect to future urban areas surrounding the Airport, and they provide useful background information regarding airport operations. These submissions are **attached** at Annexure 1 and 2.

AUCKLAND’S INFRASTRUCTURE NEEDS

13. The budget consultation documents describe that investment in transport is required owing to congestion costs of between \$1 and \$2 billion each year. All the projects listed to fix this congestion focus on land transport. NSAC considers that the Council must also consider how the region will be served by air transport as part of the transport strategy.
14. Infrastructure is defined by the Resource Management Act 1991 (“RMA”) as including stormwater and wastewater networks, land transport structures including roads, but also airports. Airports provide public air passenger

transport, plus freight, business and emergency services. The Council currently has a 22.3% shareholding in Auckland International Airport Ltd. Throughout the country, smaller regional airports are considered important to the local economy.

15. NSAC considers that priorities for Auckland's infrastructure have not considered air transport in the wider region thus far and suggests that North Shore Airport is strategically located near excellent transport connections to serve the north of the region in a greater capacity.

ISSUE 1: TRANSPORT – WHERE DELIVERY OF AIR TRANSPORT IS PART OF THE PICTURE

16. Comparing the per capita relationship between population and the number of airports serving international cities, Auckland will need another airport by 2040.
17. There are also operational pressures on Auckland Airport due to the rising passenger and cargo numbers. While Auckland Airport is proposing to expand to cope with this demand via a second runway, North Shore Airport will be able to complement this demand for regional air transport, and provide non-competing services to smaller regional centres, together with trunk routes.
18. North Shore Airport can become a fully functioning regional airport, to meet the needs of Auckland, with an approximate 500 metre extension of the current main (03/21) runway. This would enable 50 seat aircraft to access the Airport. North Shore Airport can also provide landing slots for smaller aircraft displaced from Auckland Airport. This has recently been in the spotlight with the smaller regional routes not being viable for Air NZ.
19. An extension of 500 metres would enable North Shore Airport to function and act as a viable regional facility, providing air transport and freight to most regional locations within New Zealand. 50-seater aircraft are perceived to be the size of aircraft that are safe by the public and are also large enough to operate with financial efficiency on longer regional routes, with the speed to make travel times competitive with other services from Auckland International Airport.
20. Such an expansion would provide the public with a regional air transport alternative to Auckland Airport that would save time and travel costs to currently 500,000 people who live closer to North Shore Airport than Auckland International Airport. As Auckland grows, these people will have increasingly unequitable access to regional flight choices, and this number is expected to grow to approximately one million in the next 30 years using population projections from Statistics NZ.

21. Under the 10 year budget NSAC would like the Council to:
- a) Acknowledge a long-term priority for the upgrading and expansion of North Shore Airport as a regional airport facility;
 - b) Ensure that money allocated for the *Supporting Growth projects - North* is spent by requiring the arterial road design to account for a future extended runway to the southwest of the Airport. This can be specified in the contracts to design and construct these roads. This will allow for integrated design of land and air transport links in the area;
 - c) Provide a budget to confirm and support NSAC's findings regarding the runway extension to allow community investment.

THE REGIONAL LAND TRANSPORT PLAN

22. The consultation documents state that '*Auckland Transport is leading a review of the Regional Land Transport Plan (RLTP) which sets out how transport delivery agencies (Auckland Transport, the NZTA, and KiwiRail) intend to respond to growth and other challenges facing Auckland over the next 10 years*'.
23. The Regional Land Transport Plan omits air transport and it is suggested that the omission of air from the Plan is due to Auckland Transport having a statutory obligation under the Local Government (Auckland Council) Act 2009 to undertake land transport functions. This does not allow it to coordinate with air and sea providers, which creates flaws in regional transportation strategies as identified.
24. Amendments to relevant statutes may be required so that the whole transport sector can be recognised and provided for in an integrated manner. In the meantime, it is suggested that air and sea transport serving public needs be included in the review, so that priorities and funds can be allocated with the full transport picture in mind.

THE DRAFT INFRASTRUCTURE STRATEGY AS PART OF THE SUPPORTING INFORMATION

25. Firstly, it is not clear whether the draft infrastructure strategy is under review as part of the budget. However, as many matters within the strategy are pertinent to the provision of air transport, NSAC would like to comment on the following.
26. It is noted that the strategy acknowledges that other public and private organisations deliver infrastructure networks for which Auckland Council is responsible for. However, for transport functions, the strategy only focusses on road and rail. While the strategy states that inter-regional connections are

important for economic and social success (see **Figure 1**), the performance of our road network is given priority. While this is necessary, access to air travel is also necessary. The strategy needs to add air into the transport choices discussed.

27. The development strategy under the Auckland Unitary Plan includes substantial greenfield development to the north of the existing urban Auckland, in Whenuapai, Kumeu, Wainui, Silverdale/Dairy Flat, Warkworth. These areas will contribute substantially to population growth that require new transport infrastructure including air transport. Making better use of North Shore Airport, with its location surrounded by these new greenfield areas, can be enabled with an extension, and serve these new areas plus those areas generally north of the Harbour Bridge for regional air transport connections.
28. It is therefore proposed that **Table 4.3: Public Transport – major programmes and projects** be amended to include a new category as follows:

Project/Programme	Description	Decade 1 2019-2028	Decade 2 2029-2038	Decade 3 2039-2048
Extension of North Shore Airport	Delivery of a 500m extension to the SW of North Shore Airport to provide improved regional air transport services		TBC	TBC

The maps in the Infrastructure Strategy should also be updated to acknowledge the airport location and project.

29. The cost is still to be determined, and who will contribute to the infrastructure upgrade. NSAC may require support from other parties to secure an extension. However, at this stage the upgrade of North Shore Airport as a future project needs to be acknowledged so that all of Council, their CCO's and their combined processes can 'wrap around' it. This is particularly important given the structure planning for the Silverdale/Dairy Flat business area is currently taking place. NSAC is concerned that the strategic importance and potential of the North Shore Airport will be foreclosed if development around the Airport does not provide for this important transport connection due to a lack of inclusion in the region's statutory strategies and plans.

Map 12 - Inter-Regional Connections Map

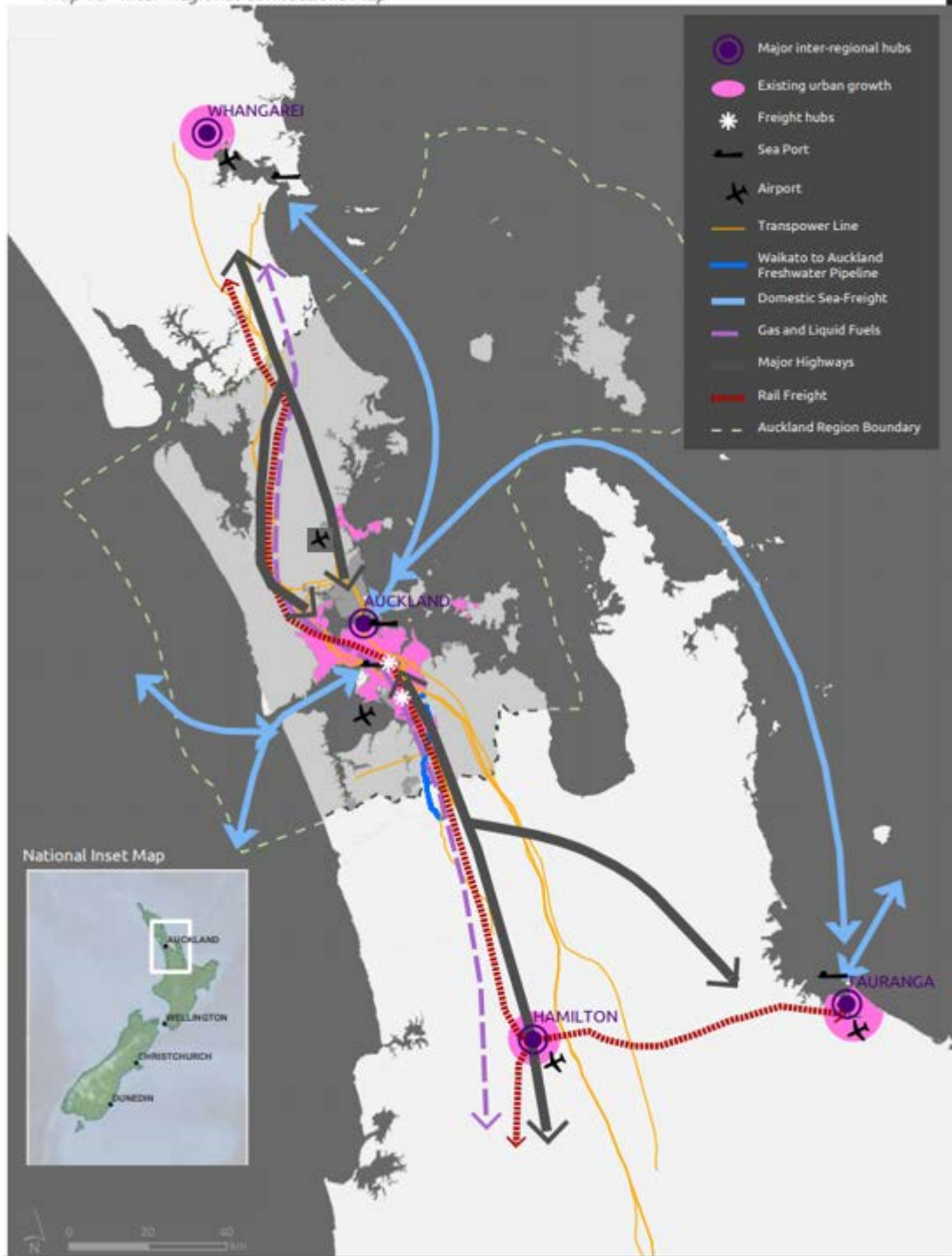


Figure 1 - including North Shore Airport as an important regional connection.

30. NSAC therefore strongly considers that future expansion of the Airport should be listed as an infrastructure project in the Infrastructure Strategy to protect the potential of the Airport as vital regionally significant infrastructure within a growing Auckland.

31. One further comment relates to the budget choices to be made for the provision of community assets to provide for growth in the north of Auckland (page 28 of Infrastructure Strategy). NSAC would prefer Option C which would acquire parks in future urban areas including Silverdale and Dairy Flat. Any acquisition of land for parks in these areas should dovetail with the operational requirements of the Airport, and provide open space to meet the needs of surrounding residents and the Airport.

CONCLUSION

32. Comparing the per capita relationship between population and the number of airports serving international cities, Auckland will need another airport by 2040. This takes into consideration the second runway at Auckland International Airport. The Council needs to acknowledge and provide for this necessity and signal an expansion of North Shore Airport as an infrastructure project that will require shared investment by the community of Auckland. Without such recognition by the Council, the opportunity to provide needed air infrastructure will be foreclosed as future urban areas around the airport are developed.
33. NSAC requests that the above feedback be accepted by the Council and that the budget priorities be amended as requested. NSAC looks forward to collaborating closely with the Council to ensure that the unique location and opportunity afforded by North Shore Airport is taken forward.
34. NSAC would like the opportunity to speak to the relevant Council committees concerning this submission.

For and on behalf of North Shore Aero Club:



Kaaren Rosser (BSc, Dipl Nat Res, CertPlan)
Senior Planner

1958 AP SUB

Richard Sapsford

From: Northern Young Nats <northernyoungnats@gmail.com>
Sent: Monday, 14 May 2018 5:14 PM
To: AKHaveYourSay
Subject: Fuel Tax submission

Dear Councillors,

We are writing to have our say on the Regional Fuel Tax to be used for the proposed Regional Land Transport Plan. As young people with an interest in Transport and Auckland's growth, we do not support the Regional Fuel Tax. We are concerned at the expense hardworking Auckland commuters will be forced to pay for projects with little justification as to why the additional expenditure is necessary above rates, tax's, levies and toll roads already collected by the Government and Council. We currently have no information on the business cases as to why the projects contained in the Regional Land Transport Plan are the priority projects. Council needs to do a better job of controlling and prioritizing spending without putting pressure on young people.

We do recognize Auckland needs improved infrastructure and deserve better transport links, including genuine choice between transport options. However the justification for fuel tax to be used to resolve the issue of congestion seems incoherent with the proposed projects such as road safety and active transport where funding for these areas are already there. Therefore it is unreasonable to ask for further funding where these are projects already being currently undertaken by both Local Boards and Auckland Transport. Projects such as 'network capacity and performance improvements' and 'growth related transport infrastructure' are also vague with not enough information being supplied for consultation, where we do not know where the money is actually spent if the fuel tax is implemented.

Please consider our thoughts as we do not support the Regional Fuel Tax for Auckland.

Kind Regards,
Northern Region Young Nats



GUIDING
LIFE'S
JOURNEYS
FOR OVER
110 YEARS.
New Zealand
Automobile
Association



Land Transport Management (Regional Fuel Tax) Amendment Bill

NZAA submission

The New Zealand Automobile Association Incorporated

342-352 Lambton Quay
PO Box 1
Wellington 6140
NEW ZEALAND

20 April 2018

SUBMISSION TO: Finance and Expenditure Committee

REGARDING: **Land Transport Management (Regional Fuel Tax) Amendment Bill**

DATE: 20 April 2018

ATTENTION: Committee Secretariat

ADDRESS: Finance and Expenditure
Select Committee Services
Parliament Buildings
Wellington 6160

SUBMISSION AUTHORISED BY Mike Noon
General Manager, Motoring Affairs
New Zealand Automobile Association Incorporated
P.O Box 1
Wellington

SUBMISSION AUTHOR Mark Stockdale

AUTHOR E-MAIL mstockdale@aa.co.nz

AUTHOR PHONE (04) 931 9986

NOTE TO REQUESTOR

The NZ Automobile Association would like the opportunity to present this submission orally.

This submission may be freely copied, cited and distributed but not altered. The NZ Automobile Association asserts its claim to authorship of this submission.

Contents

Background on the New Zealand Automobile Association	3
Executive Summary	3
NZAA Submission	4
A. Clause 65C: Requirements relating to RFT scheme	4
B. Clause 65D: Preparation of proposal to establish or replace RFT scheme	4
C. Clause 65E: Proposal for RFT scheme: content requirements	4
D. Clause 65N: Functions of Agency under this subpart	5
E. Clause 65T: Accounting for regional fuel tax.....	6
F. Clause 65ZE: Regulations	6
G. Schedule 1AA	7
Conclusion	8

Background on the New Zealand Automobile Association

The NZ Automobile Association (NZAA) is an incorporated society with over 1.6 million Members. Originally founded in 1903 as an automobile users advocacy group today it represents the interests of road users who collectively pay over \$3 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. The NZAA's advocacy and policy work mainly focuses on protecting the freedom of choice and rights of motorists, keeping the cost of motoring fair and reasonable, and enhancing the safety of all road users.

Executive Summary

The NZAA is open to the concept of a Regional Fuel Tax (RFT) in Auckland, but our view is it that has to be introduced with care and the scheme must have credibility with funders and motorists generally.

We recognise that there is a funding gap to provide for the much needed infrastructure in Auckland, and we have long been of the opinion that a RFT is a possible means of filling some of that gap that needs to be considered.

Our survey work over recent years shows that NZAA Auckland Members are willing to pay more (within reason) to improve the transport network, and a RFT has consistently been one of the more popular funding options. However, support is far from overwhelming: a recent survey of just over 2,300 NZAA Auckland Members shows that while 35 percent are in favour of a RFT, 38 percent are opposed, and 20 percent are neutral (with the rest unsure. The survey had a margin of error of +/-2%). The survey highlights deep-seated concerns about the social impacts of the RFT, and a lack of confidence in transport decision-makers to use the revenue generated to deliver projects that will have a meaningful impact on congestion, which is the number-one transport concern of NZAA Auckland Members.

We note that the discussion and consultation on a RFT in Auckland has fallen well short of the standards of engagement set out in the Bill and risks undermining public support and confidence.

We accept that, given the population size of the Auckland region, estimates are that a 10 cent per litre (cpl) RFT will raise a meaningful amount of revenue, although the ongoing success of the scheme needs to be continually monitored, particularly in respect of:

- administration costs, including rebates and non-compliance;
- leakage from consumers sourcing fuel from outside the regional boundary; and
- potential price spreading by fuel suppliers outside of the regional boundary.

While there may be merit in Auckland, the NZAA does not support introducing RFT in other parts of New Zealand.

The NZAA also supports the maximum 10-year life of any RFT specified in the Bill, which reflects our view that fuel excise will become less viable and equitable in the medium-term and will eventually need to be replaced by some form of distance-based charging for all motor vehicles.

NZAA submission

We comment on specific clauses in the Bill below:

A. Clause 65C: Requirements relating to RFT scheme

1. The NZAA supports the provisions in this clause to limit the duration of a RFT scheme to 10 years, and a maximum rate of 10cpl (excluding GST). We consider a 10-year duration is appropriate as it is our view that in the medium-term fuel-based taxes will become less viable and equitable due to technological changes in the vehicle fleet, as also noted in the Regulatory Impact Statement on the RFT. The expected growth in more fuel-efficient cars and electric vehicles (which are currently exempt from Road User Charges) will erode revenues from fuel excise, which means this provision ties in with a likely future scenario where fuel excise will need to be replaced by some form of distance-based charging for all motor vehicles.

B. Clause 65D Preparation of proposal to establish or replace RFT scheme

2. We propose the clause should be amended to include an additional requirement that any eligible capital projects must also be included in the relevant Regional Land Transport Plan, so that the projects have been previously been analysed and endorsed by the public.

Recommendation:

Include additional subclause–

(c) have been included in the relevant Regional Land Transport Plan.

C. Clause 65E: Proposal for RFT scheme: content requirements

3. In addition to setting out the forecast revenue from a RFT (under sub-clause (f)), and the underlying assumptions, the NZAA suggests that this clause should also require an estimate of the costs of administering the scheme, including processing rebates. Comparing the cost of administering a RFT scheme against forecast revenue would enable the value and cost-effectiveness of the RFT scheme to be carefully considered.

4. Additionally, we propose that subclause (c) should also require the benefits and costs of the programme to include decongestion benefits. As stated in the executive summary, congestion is the number-one transport priority for NZAA Auckland Members, and there is a strong expectation that any extra transport taxes or levies that users are required to pay will translate into improved congestion outcomes.

Recommendations:

Amend subclause (c)–

ii. describe its expected costs and benefits, including congestion reduction benefits; and

Include additional subclause–

(h) set out the forecast costs of administering the regional fuel tax scheme and the assumptions or data on which the forecast is based.

D. Clause 65N: Functions of Agency under this subpart

5. The NZAA proposes that this clause should include an additional subsection requiring regular performance monitoring of the RFT by the NZ Transport Agency, which would also be part of the reporting requirements under clause 65T. This monitoring could include:
- actual revenues against forecast (under clause 65E);
 - changes in the volume of fuel supplied in the region;
 - tax evasion and tax avoidance;
 - administration costs of the scheme; and
 - retail price monitoring to verify that all of the 10cpl is recovered in the region and has not been price-spread across New Zealand or in other parts of New Zealand, and that no more than 10cpl has been collected within the region.
6. The NZAA is extremely concerned about the possibility of price spreading, and the lack of controls to prevent this. With the expected introduction of a RFT in the Auckland Council region, New Zealand motorists nationwide must have confidence that the RFT has only been levied in Auckland and that no portion of it has been apportioned by fuel suppliers in the price of fuel supplied elsewhere in New Zealand. Otherwise the credibility of and the user-pays principle underpinning the RFT will be fatally undermined.
7. We note concerns about price spreading have been raised in the Regulatory Impact Statement on the RFT, and given as the reason for the repeal of a RFT framework introduced in the early 1990s, and the repeal of a subsequent RFT scheme legislated in

2008. The NZAA does not believe the provisions in this Bill address these concerns, more so due to the time constraints under which this Bill was drafted.

8. As it is, the retail fuel market in Auckland is very competitive, with prices varying significantly within the region and between retail brands, and typically prices in Auckland are lower than many other parts of New Zealand including Wellington and Christchurch. Prior to the establishment of aggressive price competition in recent years, the major fuel retailers would charge the same 'national' or 'main port' price in Auckland and in most of the rest of New Zealand, which would have made it very easy for motorists to identify the addition of a 10cpl RFT in Auckland.
9. The NZAA is concerned that there doesn't seem to be a mechanism for monitoring that price spreading is not occurring. Therefore, monitoring by the NZ Transport Agency must be able to demonstrate that Auckland retail fuel prices include the 10cpl RFT, in contrast with retail prices in other parts of New Zealand.

Recommendation:

Include additional subclause–

(f) regular performance monitoring of the RFT including, but not limited to:

- i. actual revenues against forecast;*
- ii. changes in the volume of fuel supplied in the region;*
- iii. non-compliance or avoidance of the RFT;*
- iv. administration costs of the scheme; and*
- v. retail price monitoring.*

E. Clause 65T: Accounting for regional fuel tax

10. As noted in our comments on clause 65N above, clause 65T on accounting should also include a requirement for the NZ Transport Agency to report on performance monitoring of the scheme.

Recommendation:

Include additional subclause–

(1) (e) performance monitoring.

F. Clause 65ZE Regulations

11. Under subsection (b) which prescribes uses of fuel that are exempt from the RFT, the NZAA suggests that the Select Committee direct regulators to consider the inclusion of "off-road use" in such regulations.

12. The NZAA's view is that a RFT is explicitly intended to fund land transport projects that benefit a region, and by implication, transport users in that region. The Regulatory Impact Statement on the RFT states that "regional transport users" will be the beneficiaries of the new transport projects bought forward by the RFT, and that "the Government has indicated that those who benefit from the transport projects bought forward should carry the burden for paying for the transport projects".
13. Therefore, if fuel purchased in the region is used off-road, then the consumer is not using the public land transport system and therefore not benefitting from the 10cpl RFT contribution.

G. Schedule 1AA

Clause 2 Certain provisions apply only in relation to Auckland until 1 January 2021

14. The NZAA supports the focus on Auckland reflected in this clause, though our preference would be that the timeframe be extended beyond three years, or that any scope to extend the RFT beyond Auckland be removed altogether.
15. While there may be merit in Auckland, the NZAA is not convinced that a RFT is practical or worthwhile in other regions of New Zealand. Other parts of the country don't face infrastructure pressures as critical as those of Auckland, and won't create the same burden for taxpayers on a national scale. Requiring motorists in other regions to pay more – especially when they generally face higher fuel prices than in Auckland as a result of smaller, less competitive markets – would be unfair and unreasonable.
16. Additionally, as the population bases and administrative areas are generally much smaller outside Auckland, the administration costs may be disproportionate to the amount of revenue generated, and the region prone to greater leakage from consumers travelling outside the region to purchase fuel in order to avoid the tax.
17. Therefore the NZAA does not support introducing RFT in other parts of New Zealand. We acknowledge the Government's desire to future-proof the policy for unexpected changes in circumstances in other centres (such as a major natural disaster creating urgent and extensive infrastructure needs), but our preference would be to 'cross this bridge when we come to it' rather than signalling to other parts of New Zealand that an Auckland-style RFT could be an option in the medium term, and thus opening the door to unrealistic expectations and demands.

Conclusion

While the NZAA is open to the concept of a RFT in Auckland, we are extremely concerned that its introduction may lead to price spreading by fuel suppliers outside the Auckland boundary. This was the reason for the repeal of two previous RFT schemes, and the possibility of price spreading risks undermining the credibility of the Auckland RFT scheme.

The NZAA does not believe this concern has been adequately addressed by the provisions in the Bill, and consequently we recommend the Bill be amended to include a requirement for the NZ Transport Agency to undertake performance monitoring, which would include monitoring retail prices and possible price spreading.

NZAA Auckland Member support for a RFT in Auckland is far from overwhelming, and there are concerns the revenue will not be spent on projects that deliver decongestion benefits. Consequently, the Bill should require congestion reduction benefits to be explicitly included in a RFT scheme proposal, while eligible projects should also be those included in the Regional Land Transport Plan.

The NZAA also does not support the Bill enabling a RFT to be introduced in other parts of New Zealand, especially given our concerns above about possible price spreading, and the likely revenue generated in a smaller geographic area versus the administration cost. We recommend that the Bill also require forecast administration costs to be set out in any proposed RFT scheme.

14 May 2018

AK Have Your Say
Auckland Council
Freepost Authority 182382
Private Bag 92 300
Auckland 1142
akhaveyoursay@aucklandcouncil.govt.nz

**THE NEW ZEALAND
AUTOMOBILE
ASSOCIATION
INCORPORATED**

**342-352 Lambton Quay
Wellington
New Zealand
PO Box 1
Wellington
New Zealand**

**T. +64 4 931 9999
F. +64 4 931 9964**

SUBMISSION FROM THE NZ AUTOMOBILE ASSOCIATION ON THE DRAFT PROPOSAL FOR A REGIONAL FUEL TAX

The NZ Automobile Association (NZAA) appreciates the opportunity to comment on the draft proposal for a Regional Fuel Tax (RFT).

We have clearly stated our views on the RFT as a policy instrument in a number of fora, most recently in our submission on the Land Transport Management (Regional Fuel Tax) Amendment Bill (a copy of which is attached).

Our position can be summarised as follows:

- The NZAA is open to the concept of an RFT, but our view is that it has to be introduced with care – the scheme must have credibility with funders and with motorists generally
- Our survey work over recent years suggests that Auckland NZAA Members would be prepared to accept an RFT, but only by a narrow margin, and not without significant concerns about social impacts. Our most recent survey (in March this year) showed 35% of respondents in favour of an RFT, and 38% opposed
- The ongoing success of the scheme will need to be continually monitored, in relation to:
 - Administrative costs, including rebates and non-compliance
 - Leakage from consumers sourcing fuel from outside the regional boundary
 - Potential price spreading by fuel suppliers outside the regional boundary
- The NZAA wants to see the scheme audited within 6-12 months of its introduction to establish whether projected revenue is on track, identify the volume of rebates and cost of administering the scheme, and determine whether fuel companies are spreading prices outside the Auckland boundary
- The NZAA supports the 10-year life of any RFT, which reflects our view that fuel excise will become less viable and equitable in the medium term and will eventually need to be replaced by some form of distance-based charging for all motor vehicles

The list of projects that the RFT will help to fund is well-balanced, and we think it is one that most Aucklanders will respond positively to. We are disappointed, however, that the opportunity to review what RFT revenue would go towards has only come now, after months of public and political discussion (including the Long-Term Plan consultation, which addressed the RFT directly). Many stakeholders will justifiably see the RFT as a fait accompli; others will have switched off from the debate – either way, potential for meaningful public engagement is limited.

We recognise that various factors (including statutory processes) made it difficult to consult with the public on the RFT in any other way. All the same, we don't believe that this process has been conducive to public trust and buy-in, and could count against public support for the scheme in the medium term.

We are happy to meet with you at any stage to discuss our views on the RFT, and provide more detail on our recent NZAA Member survey work.

14 May 2018

AK Have Your Say
Auckland Council
Freepost Authority 182382
Private Bag 92 300
Auckland 1142
rltp@at.govt.nz

**THE NEW ZEALAND
AUTOMOBILE
ASSOCIATION
INCORPORATED**

**342-352 Lambton Quay
Wellington
New Zealand
PO Box 1
Wellington
New Zealand**

**T. +64 4 931 9999
F. +64 4 931 9964**

SUBMISSION FROM THE NZ AUTOMOBILE ASSOCIATION ON THE DRAFT AUCKLAND REGIONAL LAND TRANSPORT PLAN 2018-2028

1. Introduction

The NZ Automobile Association (NZAA) appreciates the opportunity to comment on the draft Auckland Regional Land Transport Plan (RLTP) 2018-2028.

The NZAA represents the interests of our 1.6 million Members who, through their contribution of fuel excise duty, road user charges, and registration fees to the National Land Transport Fund (NLTF), are the primary funders of New Zealand's land transport system. The NZAA boasts a membership of close to 530,000 in the Auckland region.

The RLTP is a powerful and important document in the land transport planning landscape, in Auckland and nationally, setting Auckland Council's and the Government's objectives for and interventions in the transport sector for the next decade. Consequently, the NZAA takes a strong interest in the RLTP as the document which identifies what our Members – and the wider public – are going to get in return for the taxes and rates they pay to help fund the transport system.

This submission sets out our key feedback on the draft RLTP, and incorporates findings of two surveys of Auckland NZAA Members undertaken in the last six months in relation to the RLTP's content. We are very happy to meet with officials to discuss our feedback in more detail and to share our survey findings if that would be useful.

Rather than commenting on every aspect of the document, we have structured our submission to respond to the sections and sub-sections of the draft RLTP that are of most interest to us and our Members.

2. Overview

The NZAA congratulates the team that developed the draft RLTP. The document was produced under challenging timeframes and in a dynamic policy and political environment, yet the end result is relatively clear and contains few surprises to stakeholders.

The draft RLTP aligns well with the key planning documents – the draft Government Policy Statement (GPS) and the Auckland Transport Alignment Project (ATAP) – in terms of priorities and objectives, and there is clear sense of an inter-locking, cascading relationship between them. This is a clear sign that the Council and the Government are in a good position to work together and make progress.

By and large, we think the project mix included in the plan is a good one. It is well spread across the different areas of the transport system, and will lead to a safer, more efficient and more resilient transport network, better equipped to deal with the challenges imposed by Auckland's growth. We believe that, instinctively, the majority of Aucklanders will respond positively to what has been proposed.

The NZAA is sympathetic to the drive to deliver high-quality public transport (PT) alternatives to a wider cross-section of Auckland (though we would caution you not to exaggerate the scope for mode shift). And we consider the logic of developing the PT network ahead of any steps to introduce pricing for demand management across the Auckland network to be compelling.

We're also pleased to see that the desire to deliver a transformative PT programme has not prevented the officials from acknowledging the reality that additional road capacity will be required if we are to keep Auckland moving.

That said, we are concerned about a lack of detail when it comes to the benefits that the programme will deliver, particularly in relation to de-congestion. This makes it difficult for stakeholders to assess the extent to which the project list represents the best use of the resources available. From what we have seen of the latest ATAP report, we are conscious that the congestion outcomes result in no improvement on previous versions of the transport plan. By not being clearer on this with the public, we are concerned that you are setting the stage for a rapid downturn in public support further ahead.

The timeframe for consultation and feedback on the draft RLTP – a mere two weeks – is nowhere near long enough, and doesn't provide stakeholders with a fair chance to dissect the programme, and consider its value (including in the light of an imminent increase in fuel taxes). For some time now, our Members have expressed a lack of trust and confidence in the transport planning process, and the nature of this consultation process would only serve to reinforce that.

We realise that the timeframe is a function of statutory processes (and is therefore a central government responsibility), though we would like to know what Auckland Council is doing to avoid a similar situation arising in the future.

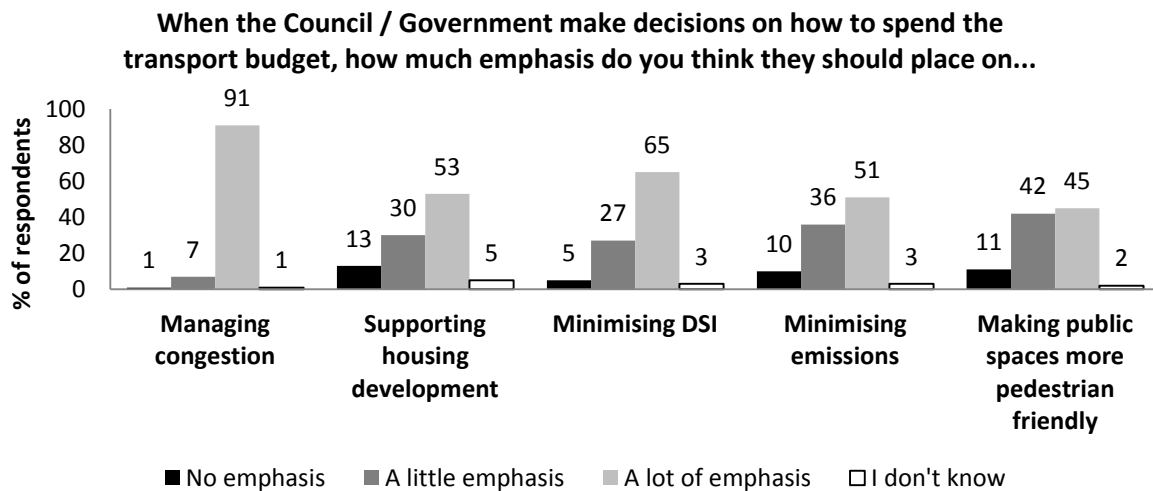
3. The views of NZAA Members

As discussed above, the NZAA has close to 530,000 Members in the Auckland region. Surveying this group provides an excellent window into public sentiment, and is at the core of our advocacy work in Auckland.

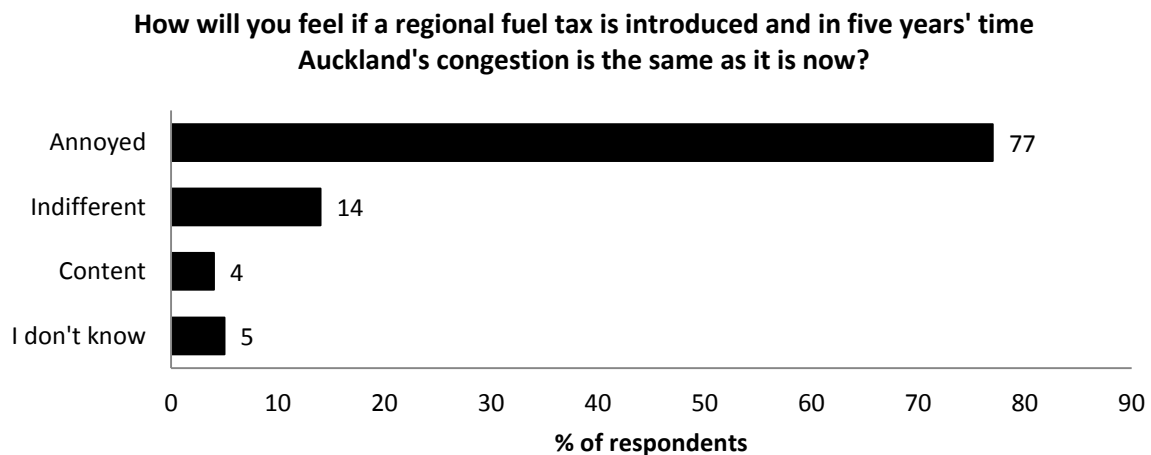
To gauge Auckland NZAA Member views on the issues being discussed within both the Long-Term Plan and the RLTP, we carried out two survey projects – one qualitative and one quantitative – in the lead-up to this consultation period. The first (in December 2017) entailed face-to-face interviews with a small sample of Auckland NZAA Members; the second (in March 2018) entailed an electronic survey of a random selection of NZAA Members from across the city, which garnered over 2,300 complete responses.

The results show that Auckland NZAA Members are crying out for significant and sustained improvements to Auckland's transport system, and they are desperate to see the work begin as soon as possible. By and large, Auckland NZAA Members are willing to pay at least a little more to improve the transport network, provided the extra money goes towards well-planned projects that will deliver results.

Congestion is indisputably the number one priority when it comes to the transport programme and, more than anything, our Members hope to see improved travel times as a result of increased investment.



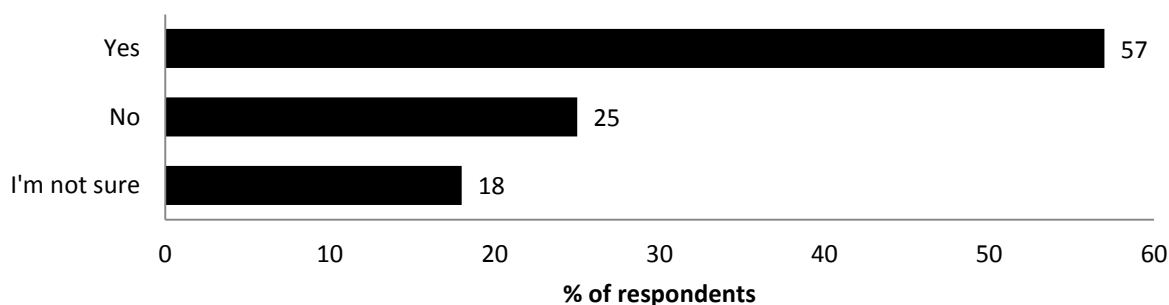
Results from survey of 2,345 Auckland NZAA Members, March 2018



Results from survey of 2,345 Auckland NZAA Members, March 2018

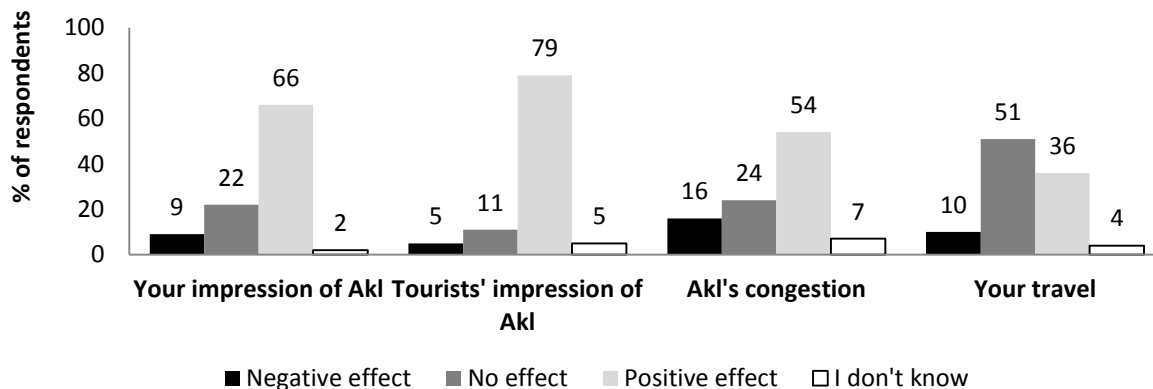
Our Members are generally keen to have access to better quality PT alternatives, and they agree that substantial improvements to Auckland’s PT network are needed if it is to provide a realistic alternative to travel by car for more people. They like the sound of enhancing the rapid transit network and, specifically, the idea of light rail to the Airport (even though most indicate they wouldn’t use it regularly). Expectations remain high about the benefits that increased PT investment will deliver in terms of de-congestion, and in terms of the coverage, frequency and quality of an enhanced PT network.

Do you support the delivery of light rail between the CBD and airport (via Dominion Rd and the Southwestern Motorway)?



Results from survey of 2,345 Auckland NZAA Members, March 2018

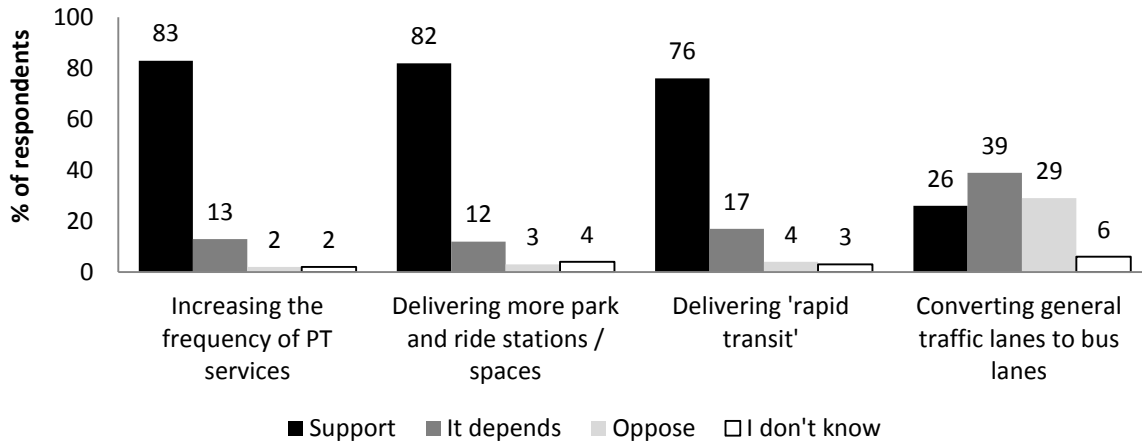
Let's assume light rail is constructed between the CBD and Airport. What effect do you think it will have on...



Results from survey of 2,345 Auckland NZAA Members, March 2018

Importantly, Auckland NZAA Members tend to see PT as an ‘and’ not an ‘or’. That’s to say, they are eager to have improved PT levels of service, but as a complement to – rather than a substitute for – car use. They have little interest in trade-offs being forced on them between PT investment and investment to support driving, or in making concessions on the access they currently enjoy as drivers. Hence, investment in areas like park and ride is well supported, but conversion of general traffic lanes into bus lanes is much less popular.

What do you think of the following approaches to improving public transport?



Results from survey of 2,345 Auckland NZAA Members, March 2018

4. Section-specific comments

4.1 Auckland's Challenges

In our view, the draft RLTP accurately reflects the key challenges that Auckland's transport system is facing. The Overview sub-section articulates the pressures that are being brought to bear on the Auckland network, and there will be little disagreement among stakeholders about the specific areas the document focuses on to detail the challenges.

We are pleased that the RLTP highlights value for money as a challenge and we are confident that this focus will be strongly supported by Aucklanders. However, our view is that for most Aucklanders the top priority when it comes to value for money will be putting the limited transport budget to best use, as well as transparency and accountability around decision-making. The matters canvassed in the value for money section of the RLTP, such as the challenges associated with the increasing number of parties involved in the delivery of transport infrastructure, are secondary issues.

4.2 Addressing Auckland's Challenges

While the section on Auckland's Challenges is clear and concise, the section dealing with how those challenges are to be addressed is much less so. A comprehensive list of projects is laid out, but little is done to show how each of those projects responds to – and helps to mitigate – the challenges that have been identified.

Having read the ATAP report, and been briefed in detail on the analysis behind it, the NZAA has an understanding of the types of results that will be achieved in at least some of the areas, but the bulk of your stakeholders will not have benefited from this insight. For Aucklanders to be able to make judgements about the quality of the proposed programme, much more detail is needed on project outcomes and benefits, and the description of each project should be structured in a way that clearly demonstrates how it deals with the key issues. In our view, the current approach runs counter to the desire signaled in the previous section to demonstrate and deliver value for money.

Further, congestion needs to be an explicit focus within this section. Currently, it receives almost no mention, and this is inconsistent with the priority it's been accorded earlier in the document, and out of step with public expectations about what a transport programme should deliver.

The latest ATAP report indicates that the updated project list will deliver no de-congestion benefits beyond the previous version, despite significant hype around high-profile projects like light rail to the Airport, and additional costs being proposed for motorists to help fund it. While the congestion result does not necessarily represent a failure of the transport plan, it will clash with public expectations. By not 'front-footing' this, there risk of a significant public backlash when the lack of congestion relief becomes apparent, and this could see initial public support for the programme fall away.

4.2.1 Strategic direction

The purpose of this sub-section appears to be to set out the principles and judgements that guide the list of actions that follows. One of those principles is that "Auckland will need to move away from a city where the dominant mode of travel is by single occupant private vehicles, to a city where public transport, walking and cycling play a more significant role." Statements like this are critical signposts for the direction of your transport policy, and they can't be made lightly.

While there's little doubt that increasing vehicle occupancy and utilisation of other modes is an important part of improving the performance of the Auckland transport network, all the evidence suggests that the extent of mode shift will be limited. ATAP's own modelling indicates that PT patronage and active modes will grow from 25% to around 33% of morning-peak trips over the next 10 years, meaning private cars (and presumably, single occupant private cars) will remain very much the dominant transport mode.

Our concern is that you are creating unrealistic public expectations about the extent of 'transformation' that's on offer and glossing over the extremely complex trade-offs and compromises that would be required. Doing so creates a weak platform for a constructive conversation with Aucklanders about their current and future transport choices. Statements like this need to be accompanied by data and context, and clarity about what you are actually seeking to achieve.

4.2.2 Safety

The NZAA strongly supports the draft RLTP's reinvigorated approach to road safety. The NZAA has long advocated for more investment into infrastructure, tools and technologies that have proven road safety benefits. We look forward to an enhanced programme that translates into improved road safety outcomes, and we look forward to partnering with you to help deliver it.

While we consider there is benefit in a discussion of whether a Vision Zero framework should be applied in Auckland and nationally, we consider it essential that the starting point be an agreed understanding among all transport decision-makers of what Vision Zero is, and what it would look like in practice.

There are currently misconceptions (even among those on the inside of the debate) around what Vision Zero actually means. In much of the public and professional debate, we see Vision Zero being immediately translated into a tagline of a transport system with no deaths – yet even countries that have implemented Vision Zero for decades have not achieved this. It is by no means a quick or final solution.

We would want to see these issues, as well as the trade-offs and compromises that'd be required for all transport users (including the most vulnerable) worked through as part of the consideration of whether Vision Zero should be adopted here.

Separately, we are delighted to see red light cameras included in the list of proposed actions. This is an area of road safety we have long helped to champion, and we have strongly supported Auckland Transport's more recent initiatives aimed at addressing red light running. We would very much like to assist with the red light camera programme, either as part of the site selection process, the public engagement, or the post-implementation review.

4.2.3 Access

The conceptualisation of transport in terms of access makes good sense, and is consistent with both the draft GPS and current transport thinking, so we are comfortable with a section being dedicated to it specifically. However, we note that the content of this section is exclusively focused on public transport, which implies that access doesn't pertain to other modes. We would like to see this updated to reflect the role that private cars, walking and cycling play in giving people access to the places they need to be.

4.2.4 Rapid Transit and Buses

Nowhere in the draft RLTP is the need for more detail about outcomes more necessary than in the discussion of light rail. This is the centre-piece of the programme, by far the most expensive line item (the combined capital cost of the two light rail projects is around double that of the CRL), and there are big expectations at a public level about what it will deliver. Yet the closest the document comes to describing outcomes is the comment: "Provision of rapid transit has the potential to improve public transport mode share, help to reduce congestion and support urban development."

Again, this limits the ability of stakeholders to assess the quality of the programme as a whole, and runs counter to the value for money objectives signaled earlier in the document.

The lack of a business case for the project could help to explain the absence of any detail, and itself remains a source of deep concern for us. Without any robust data, we have been unable to form a firm view on the light rail programme, or of critical issues such as the merits of opting for light rail over rapid bus or the rationale for bringing forward the connection to the Airport by a decade. The development of a business case should have come well before public consultation, and the fact that it hasn't represents poor process. At present, public support for the project is based on the vision that's been sold, rather than evidence, and we fear that support could evaporate when the gap between vision and reality is laid bare.

As discussed above, there is little appetite among Auckland NZAA Members for the conversion of general traffic lanes into dedicated bus lanes. The document signals a number of key arterials across the Auckland isthmus for prioritisation. We would caution Auckland Council and Auckland Transport to move gradually on this, given the likelihood of public push-back, and to back up any decisions to re-allocate road space with clear evidence about the network-wide transport benefits.

4.2.5 Walking and Cycling

We're pleased to see the emphasis Auckland Transport is placing on making it easier and safer to walk and cycle. We particularly support efforts to increase walking and cycling trips for school-related travel, as given that these trips are often short, we see significant potential for more of them to be taken by active modes and consequently take vehicles off the road during peak periods.

We're aware of many schools around Auckland who have identified improvements that would help to make travel to their schools on foot or by bike safer, and would be eager to work with Auckland Transport to deliver these improvements. We are keen to assist in this process in any way we can.

4.2.6 Network Capacity and Performance Improvements/Technology

We strongly support the activities proposed in the sub-sections dealing with Network Capacity and Performance Improvements and Technology. These are well targeted and realistic, and will significantly help efforts to get more out of existing infrastructure.

Further, initiatives such as the Network Optimisation programme represent an excellent opportunity to demonstrate momentum to the public, given that they will be highly visible and will have an impact that will be felt on a daily basis. We therefore believe that it's critical to make an early start on these, to counter some of the frustration that will be caused by the disruption to the network as a result of major capital works.

We note that the draft RLTP is somewhat muted on the issue of congestion pricing. Given its potential impact when it comes to congestion mitigation, and given the attention it has received to date under the Auckland Smarter Pricing Project, we believe it warrants more emphasis in the draft RLTP. We hope the approach that's been taken does not point to a dialing back of the Smarter Pricing Project – we have been strong supporters of this piece of work and would be concerned to see any loss of momentum.

4.2.7 Supporting growth

Consistent with earlier comments, we'd like to see much more detail about how the projects put forward in the RLTP will meet increased demand for travel arising from Auckland's growth.

We think it would be useful for the RLTP to overlay the transport projects that it is proposing to deliver onto the map on page 28 (within the section on Auckland's Challenges) which shows where new developments are planned to be delivered. This would help to demonstrate how the transport programme will support planned housing development.

We note that the map on page 28 indicates that much of the housing development that will take place in the existing urban area will be concentrated around the rapid transport network. This suggests a desire for the rapid transit network to accommodate the bulk of the trips that are generated by these new developments.

While locating developments alongside quality public transport is laudable, it is unlikely that public transport will provide for all of the trips that these developments will generate – given that trip patterns in Auckland are typically fairly dispersed, it is highly likely many new trips will be taken by car. Consequently, we're concerned about the effect that new developments located within the existing urban area will have on the road network, and are not clear how the RLTP will provide for these trips.

4.2.8 Corridor Improvements

We're pleased to see that the RLTP recognises that it will not be possible to accommodate all of Auckland's growth in travel without adding capacity to Auckland's road network, and is therefore proposing to deliver a series of road projects during the next decade.

We strongly suggest that these projects are carefully designed to ensure that they are sufficiently future-proofed to accommodate forecast growth in travel for the foreseeable future.

4.3 *Measuring outcomes*

We are pleased to see a specific focus on tracking progress towards addressing Auckland's challenges. This sends an important message about transparency and accountability, and will help to build trust and confidence with the public. All the same, we'd like to suggest some improvements to the measures proposed in relation to access.

In the section dealing with Auckland's Challenges, the draft RLTP indicates that Auckland's access challenges arise from the fact that Aucklanders are experiencing "longer travel times and reduced travel time reliability, making it more difficult to reach employment, education, healthcare, shopping, services, recreation and other activities". We agree with this assessment, and we believe that this is where the performance measurement should be focused, particularly in relation to the dominant travel mode (the private car).

The primary performance measure should deal with the congestion faced by car commuters. It has to be expressed in a way that users can easily understand and that resonates with their daily experience, and we would therefore suggest that tracking travel-time delays on a set of key routes/corridors as the best approach.

Alongside measuring congestion, we would like to see targets set for congestion management and mitigation, to help focus Auckland Transport's efforts and to help ensure realistic public expectations. All of this will need to be shared in a way that allows the average Aucklander to easily access the information – thus, it can't be buried in Council reports. This is a step we have long called for, and an area where we have considerable expertise, and we would be delighted to help you develop your approach.

Separately, in the area relating to measuring performance in delivering value for money, we're pleased to see an intention to draw on results from post-implementation reviews. We would like to see thorough post-implementation reviews carried out for all major projects, and the results made easily available to the public. This strikes us as an excellent opportunity not just to learn from past successes and failures, but also to build public awareness and trust.

4.3.1 Funding and expenditure

We note that there are a number of funding assumptions in the draft RLTP, such as the amount of funding the proposed regional fuel tax will raise and the projects that will be delivered by Crown Infrastructure Partners. The draft RLTP assumes \$150 million - \$170 million per annum for the former and a total of \$360 million worth of projects for the latter.

We think it is important that the final RLTP makes clear what the flow-on effects will be if either (or both) of these assumptions prove to be incorrect. We're aware that with the revenue raised from the regional fuel tax, in particular, a shortfall in revenue may have significant flow-on effects in terms of funding availability, due to the plans to use fuel tax revenue to leverage revenue from other sources.

4.3.2 Projects not included

A number of important projects have missed out in being included in the RLTP. Given these projects were proposed in order to address very real problems on the network, we're keen to understand what conditions will have to be met in order for them to be delivered.

5. End of submission

Thank you again for the opportunity to provide feedback on the draft RLTP.

As mentioned above, we are happy to meet with you to discuss the content of this submission and provide more detail on the findings of our NZAA Member survey work.



14 May 2018

Auckland Regional Transport Committee
C/O Auckland Council
Private Bag 92300
Auckland 1142

rntp@at.govt.nz

SUBMISSION TO PROPOSED REGIONAL FUEL TAX AND DRAFT AUCKLAND REGIONAL LAND TRANSPORT PLAN 2018-28

Introduction and Overview

The Parnell Business Association is one of 48 BIDs in Auckland, representing over 25,000 businesses with a combined capital value estimated at \$24 billion. Our association represents over 1,100 businesses with a capital value of over 1.7 billion.

The Auckland Regional Transport Committee is seeking feedback on the Proposed Regional Fuel Tax and Regional Land Transport Plan 2018-28.

In summary:

- we agree that rapid population growth in Auckland has brought with it significant transport challenges and we support the focus in your proposals on public and active transport, which are designed to free up road capacity;
- our preference is that demand management of our existing transport network needs to be a key solution (following 'user pays' approaches, such as congestion charging);
- while we initially supported a regional fuel tax as an interim solution, the unexpected and previously unannounced additional national fuel tax and road user charge increases will place a further financial burden on business;
- we are concerned that the significant works planned (such as cycleways and light rail), will result in disruption detrimental to businesses and we ask that any disruption be properly mitigated (and transparently funded through a development response budget)
- road corridor improvements together with enhancing network capacity are a priority for us to make better use of the existing transport network and increase travel times through key routes and corridors.

Question (1) – Draft Regional Fuel Tax Proposal

Your on-line consultation says that without a Regional Fuel Tax (RFT), the funding available will only cover renewing our existing transport network and the projects we have already committed to, e.g. the City Rail Link. You say that to enable you to deliver projects that improve congestion, public transport and road safety, you recommend an RFT of 10 cents per litre plus GST (11.5 cents). You have asked for our opinion on this proposal, and especially if we support it, are neutral, or oppose this proposal.

We agree with your assessment that rapid population growth has brought challenges, including increased congestion, reduced accessibility, increased deaths and serious injuries on the road network, and increasing negative impacts on the environment. We also accept that we are not going to address this problem simply by building more roads. Demand management of our existing network has to be a key solution, especially creating priority for customer, employee and business traffic.



We do recognise the need to raise more funding for transport projects and services.

Our preference is to introduce initiatives that both manage demand and raise funding equitably as soon as possible (such as congestion charging), balanced with investment into affordable and more frequent public transport in order to effect sustainable behavioural change.

In the interim, while we initially supported a regional fuel tax of 10 cents per litre (plus GST), the previously unannounced additional 9-12 cent per litre national fuel **excise duty increase**, and **equivalent road user charge increases**, (to be brought in over the next three years) will place a further unexpected financial burden on business. This is likely to cause a supply chain knock-on effect that may deliver unintended consequences such as price rises on consumer goods and services. We also note the recent swing in support from the general public towards the proposed RFT and feel this is indicative of the reaction to a double tax burden. It is our opinion that the impact of the RFT will be minimal on commuter behaviour while the inflationary impact is likely to will be wide reaching.

Question (2) –Regional Fuel Tax Projects

Your on-line consultation says that you are proposing to spend the Regional Fuel Tax (RFT) on various programmes and projects, including: (1) Bus priority improvements; (2) City centre bus infrastructure (facilities); (3) Improving airport access; (4) AMETI Eastern Busway; (5) Park and rides; (6) Electric trains and stabling (storage facilities); (7) Downtown ferry redevelopment; (8) Road safety; (9) Active transport (walking and cycling); (10) Penlink; (11) Mill Road Corridor; (12) Road corridor improvements; (13) Network capacity and performance improvements; and (14) Growth related transport infrastructure (transport services and facilities for new housing developments). You have asked how important these projects are for us.

We support the shift of focus to public and active transport based on modelling and business case evidence supplied by Auckland Council and their agencies, which indicates investment across public and active transport modes will free up road capacity. We have not contested this evidence, but will closely monitor the expected outcomes against delivery. While we support these initiative in principle, we are not supportive of those that impact negatively on road capacity and parking

With regard to road corridor improvements, we agree that congestion on the arterial network is a significant concern, especially congestion on the freight network. While we agree that corridor improvement is important, we ask that the emphasis be first on improving connections to existing urban areas, the efficiency of existing urban corridors and improving access to the Ports of Auckland.

With regard to network capacity and performance improvements, we agree that Auckland needs to make better use of its existing transport system to increase the number of people who can travel through key routes and corridors. We also support Auckland ensuring that the operation of existing transport infrastructure and services are optimised.

However, in terms of new projects, our learnings from recent examples mean that we hold major concerns with the significant works planned (such as light rail) and some of those already underway (such as cycleways) that there will be harmful disruption to businesses during construction and over the longer term, (especially where that relates to loss of parking to support business). In the interests of the Auckland economy, it is of utmost importance to us that a comprehensive strategic development plan be implemented so that any business disruption be identified, minimised and avoided where possible through careful project management and adequately funded initiatives be designed and actioned to remedy and mitigate any disruption that is unavoidable.



Conclusions

While we welcome the release of the Regional Land Transport Plan as well as the Auckland Transport Alignment Project Report and the greater clarity this now brings to funding requirements, expenditure and broad delivery timeframes for transport projects across Auckland, we also need more detail on the precise timing and the relative priorities for both the funded and unfunded projects set out in the Plan.

It is of utmost importance to us that early and clear channels of collaborative communication are established between the delivery agencies (such as Auckland Transport) and individual BIDs as well as key stakeholders in those areas affected by the planned works in order to facilitate a smoother transition and a more efficient outcome for the projects.

It is also critical that the solutions sought are advantageous to Auckland for the next few decades and not a reactive stance for political expediency in the short term.

PARNELL RESPONSE TO BOTH FUNDED AND UNFUNDED PROJECTS

Parnell is Auckland's first suburb and has an enviable setting on the city fringe. It is one of the gateways to the city centre; located from the Auckland Domain to the bays of the Waitematā. Parnell is close to a number of major facilities including the Auckland War Memorial Museum, Spark Arena, Ports of Auckland, Auckland Hospital and the University of Auckland. It has long been one of Auckland's most desirable suburbs due to its strategic location, range of restaurants, bars, parks, community facilities and employment opportunities.

Yet with all these attributes, it is topographically challenged and experiences a lack of East/West connectivity, which is hindering how the suburb develops. It is also squeezed between the CBD and Newmarket, at the mercy of SH16, the heavy traffic from Ports of Auckland and the resulting restricted access in and out of the suburb. This could be remedied with a redesign of the section of SH16, between Ports of Auckland and Stanley Street. While we support several initiatives in greater Auckland to improve our multimodal transport options, it is of no use if the existing network in and around the city fringe is not improved.

The Parnell Business Association has been advocating for a precinct or master plan for Parnell as it is the only city fringe precinct without one. Recently The Waitematā Local Board has sponsored the development of a Local Area Plan for Parnell. This consultation document outlines a vision for the future of Parnell as well as objectives and strategies for achieving the vision. The consultation document has been developed in collaboration with a working group of key local stakeholders in Parnell as well as mana whenua.

When this consultation is complete, it will outline various important projects, which will need to be incorporated into the RLTP and we will then need the kind of funding support that has been offered to other town centre upgrades. The current Draft RLTP of over \$4 billion offers virtually nothing for Parnell and there are almost no specifically funded projects that are of direct benefit to Parnell (with the exception of 2 small NZTA allocations).

The Parnell Station is a game changer and offers an opportunity to create a new destination gateway to Parnell as well as support Public Transport uptake. It is unacceptable that the linkages in and around the station have not been considered and funded for a public transport project to realize its full potential, including footpath upgrades, access ways, the underpass and a cycleway through the old tunnel. Immense development will take place on the adjoining land by Summerset Group and Auckland Transport should be setting the foundation and parameters of this potential urban space.

Is this the forgotten suburb?

Comments on Appendix 1 Table 1A– Auckland Transport Proposed Funded Capital Programme

Committed, Ring-fenced, On-going Operational and Renewal Projects and Programmes (Alphabetical order)		
Project Name	Project Description	Indicative Project Cost \$
Funds for Local Board priorities and to support housing growth		
Local Board Initiatives	<p><i>To allow Local Boards to fund transport projects in their communities. Projects to be funded will be worked through with Local Boards to meet their specific priorities.</i></p> <p>The following are key projects for the Waitemata Local Board, but additional funding will be needed from Auckland Transport in order to meet these objectives</p> <p>Parnell Station – Parnell Station opened in early 2017 to limited services. The Board wants to ensure Parnell Train Station is operational to full services and accessible to all users at the earliest opportunity. This station has the potential to be the fourth busiest station on the network and will be an essential connection for the University of Auckland, Parnell Town Centre, Auckland Museum and The Domain, Stanley Street and Beach Rd.</p> <p>Parnell Train Station Pedestrian and Cycling Connections - Provide accessible pedestrian and cycling connections to Parnell Station. Open the Greenways route from The Strand through the old Parnell tunnel and create an accessible pedestrian connection from Parnell Station to the Domain, the Strand and Parnell Town Centre.</p>	242
Projects to be confirmed		
Projects deferred from 2017/18	<i>List to be confirmed in the final RLTP</i> We need detail on the list of deferred projects together with allocated costs and timing	TBC?
Committed Projects and Programmes		
	It is most concerning that within a budget allocation of over 4,2 billion, there is no specific allocation for a project of direct benefit to Parnell	
Ring-fenced Projects and Programmes		
	We note that there has been 41 million allocated to <i>'Local road upgrades, improvements to Glen Innes town centre and enhanced linkages to public transport delivered in conjunction with the Tamaki Regeneration Project'</i> . We need to see the same level of commitment to Parnell following the consultation phase of the Parnell Local Area Plan	
On-going Operational Programmes		
Advanced Destination Signage	<i>Installation of advanced directional signage and route numbering signage on the local road network to assist in customer wayfinding</i> . Parnell is challenged by topography and lack of East/West connectivity. As home to Auckland Museum and several other key attractions, good wayfinding is key to our objectives. We have had sight of the planned 'gateway' signage plinths planned for directional signage to Parnell Station, but that is not nearly adequate for the whole area. Additional gateway plinths are	6

	needed further up Parnell Rd as well as in and around St Georges Bay Rd to promote connectivity.	
Bus Priority:	<i>Localised Improvements Delivery of localised bus priority improvements across Auckland to support the roll out of the new bus networks</i> – We are supportive of new bus networks to transport employees to their place of work, and note that while the Link busses adequately service Parnell Rd, we desperately need more busses routed along The Strand, from Britomart. Currently there is only 1 bus that goes from Beach Rd along the Strand, to serve an area that will soon have nearly 2,000 workers.	53
Improvements Complementing Developments	<i>Programme to allow Auckland Transport to proactively work with developers to improve transport outcomes associated with new developments.</i> A recent missed opportunity in this regard is the development of the Manson site in St Georges Bay Rd. Not only are busses required along The Strand but a shuttle is needed to access the station and we are not aware of any positive conversations with Auckland Transport and developers in this regard.	11
Parking Programme	<i>Programme of initiatives to support AT's parking activities, including residential parking permits, on-and off-street paid parking, and enforcement activities.</i> We are supportive of the Parnell Parking Management Plan and need this to be implemented for the whole suburb as soon as possible.	44
PT Safety, Security and Amenity and other capital Improvements	<i>Programme to enhance safety, security and amenities at Metro train stations and terminals region wide, as well as bus stops, minor improvements at stations, wharves and provision of PT information.</i> It is imperative that safety and security measures such as the ticket gates at Parnell Station are implemented as soon as possible, as well as the completion of the remaining platform works. The Tui-Tui Arts Trust has put forward a proposal to occupy the heritage station building in the interim, which we have supported. The collective of Parnell Heritage, Parnell Trust, Auckland Museum and Parnell Business Association are looking to have a mini 'i-sites type tourist facility within that building as part of the long term objective of giving Parnell Station destination appeal.	121
Regional Improvement Projects	<i>Programme to respond to community requests for corridor improvements that focus on ensuring safe and efficient operation.</i> Despite an upgrade in lighting over the pedestrian crossings in Parnell, they still pose a hazard and there have still be further accidents involving pedestrians – both in the day and at night. Calls to improve this and potentially create signalised or raised crossings have not been addressed. Neither have safety concerns along The Strand (NZTA)	62
Renewals	There is a substantial budget allocation here and Parnell would just like our fair share of renewals. Several of the side streets are in disrepair an there is not a single bed of flowers on a footpath in Parnell, as compared with many other suburbs.	3,073
Local Board Projects (Alphabetical order)		
Orakei shared path	We note mention of <i>A cycling and pedestrian feeder link from the Gowing Drive area to the Glen Innes to Tamaki Drive Shared Path</i> , yet very little else is specified. The Waitemata local board are advocating for a cycleway through the old tunnel to The Strand, which would be the most direct way to get to the CBD from Newmarket, as well as a delightful ride. The previous cost estimate would be greatly reduced now that construction of the bridge in Sarawia Street is underway at one end and the Carlaw Park Pathway at the other. Mention has been made in this document of a crossing at Stanley Street by	

	NZTA – so all that is left is the middle section. Summerset Group could also be approached for a contribution.	
Environmental Focus		
Street Lighting Improvements	<i>Programme to deliver improved street lighting throughout the Auckland Region where it has been identified as deficient, such as where there are safety concerns. This programme also includes rollout of LED street lighting on the local road network.</i> It is noted that the roll out of LED lighting is part of this budget and we would like that to roll out in Parnell as soon as possible. (2019 has been indicated) Parnell Rd is a lot darker than several other town centres.	
Public Transport		
New Footpaths	<i>Regional Programme Programme to construct new and widened footpaths.</i> Improved pedestrian footpaths from Parnell Station up to the town centre needs to be on a priority list for this section, as well as a discussion around mechanically aided pedestrian assistance (such as escalators). -	45
Urban Cycleways Programme	<i>Completion of the current Urban Cycleways Programme .</i> We are supportive of cycleways that improve amenity and do not destroy business and are currently awaiting an update following workshops late in 2017 on an updated design for Gladstone Rd and upper St Stephens Ave. The cycle route from Newmarket through the old tunnel and along the railway line is the preferred option to be included on the Urban Cycleways Network. .	153
Walking & Cycling Programme	<i>Walking and cycling programme focuses on achieving maximum impact for short trips to the city centre, public transit interchanges, schools and local and metropolitan – as per above comments</i>	338
Other bus network improvements		
Whole of Route Bus Priority Programme - Phase 1	<i>Delivery of whole of route bus priority improvements across Auckland to support the roll out of the new bus networks.</i> As per previous comments we desperately need more busses routed along The Strand, linking to Britomart. Currently there is only 1 bus that goes from Beach Rd along the Strand, to serve an area that will soon have nearly 2,000 workers. We note mention of improvements within the CBD, as well as the Eastern suburbs, but no mention of Parnell.	215
Network Capacity and Performance Improvements (Alphabetical order)		
	Please refer to general overview for response to this section – refer S16, current corridors	
Corridor Improvements		
Additional Seal Extensions	The tar seal is folding along The Strand due to ongoing heavy use from trucks	



Comments on Appendix 1 Table 1B – Auckland Transport Capital Programme - additional items currently unfunded

Public Transport		
Rail improvements including bus-rail interchanges		
Parnell rail station underpass access	<i>Underpass at northern end of platform to provide customer access to both platforms from Carlaw Park and Parnell. At a cost of 3 million, it is unacceptable that this tiny project has been put on hold. This is a vital link in the cycling, pedestrian and PT network and as previously described could potentially be co funded. This project must be reallocated to funded together with cycleway route via the old tunnel.</i>	3
Corridor Improvements		
St Georges Bay Road street upgrade project	<i>Renew existing footpaths, kerb & channel and carriageway on St Georges Bay Road. This project needs to be brought forward in response to the Parnell Local Area Plan. Over the past few years developers have invested over \$100 million into this street alone and soon there will be approximately 2,000 workers in the area. Initial feasibility work has already been done by Auckland Transport and with certain funding commitment from Auckland Transport, there is potential for a public/private partnership.</i>	7

Comments on Appendix 2 – New Zealand Transport Agency Investment Programme

New Zealand Transport Agency Investment Programme - committed and major ATAP initiatives		
Maintenance, Operations and Renewals		
	Is anything identified in here for SH16 in Parnell? This is of the utmost necessity!	1499
Active Transport		
SH16 Gladstone to Alten Road	<i>Investigate options for missing link Grafton Cycle way to Gladstone. Connection of existing infrastructure. Gladstone Road/ SH16 intersection is likely to be signalised with provision of cycle lanes to Quay Street (currently investigating options with AT/ Ports and AMA). Opportunity to connect to Grafton. It is essential that the dangerous intersection with SH16 and Gladstone is addressed. Full engagement with the Parnell BID and Strand stakeholders would need to take place before considering the connection to Grafton.</i>	3
SH16 Stanley St Pedestrian Crossing	<i>Upgrade of the SH16/Stanley St intersection to account for expected increase in pedestrian numbers through the interchange. This is recommended to be in the form of a separate pedestrian and cycle crossing facility. We are in total support of this as an ideal extension of the Station link via the Carlaw Park Pathway and would like this prioritised</i>	5
Corridor Improvements		
	Within this category there are several mentions of SH16, totally several millions and we are totally	



	aghast that there is no mention of an upgrade to the section of SH16 from the Ports of Auckland to Stanley Street. This section of the corridor is downright dangerous and carries far too much heavy traffic, cuts off Parnell from the CBD and constrains access into Parnell Rd and Carlaw Park. While we agree that corridor improvement is important, we ask that the emphasis be first on improving connections to existing urban areas and addressing the efficiency of existing urban corridors. This section of road should be undergrounded for Ports Traffic.	
--	--	--

Comments on Appendix 3 – KiwiRail Capital Programme

KiwiRail Group - Funded Programme (Alphabetical order)		
	It is the obligation of KiwiRail and Auckland Transport to get Parnell Station to full operational status as soon as possible, as an important link in the Public Transport network for greater Auckland.	

Ponsonby

business association

14 May 2018

Auckland Regional Transport Committee
C/O Auckland Council
Private Bag 92300
Auckland 1142

rltp@at.govt.nz

Copy to: Waitemata Local Board

waitematalocalboard@aucklandcouncil.govt.nz

Submission to Proposed Regional Fuel Tax and Draft Auckland Regional Land Transport Plan 2018-28

Introduction

The Ponsonby Business Association welcomes the opportunity to make this submission to the draft Auckland Regional Land Transport Plan 2018-28.

The Ponsonby Business Association ('Association') supports the submission of AKBIDS – the Business Improvement Districts of Auckland, but wishes to make the following more specific submissions relating to Ponsonby.

The Ponsonby Business Association ('Association') is the Business Improvement District and business association for the area. The Association has 500 members across 7 different retail/service categories.¹

The Association's Vision for Ponsonby is:² *"Ponsonby is a vibrant and successful urban village that buzzes with street life both day and night. Its unique style and eclectic charm make it a nationally and internationally recognised destination. Ponsonby is recognised for its culture and character which has enabled it to evolve as a forward-looking and sustainable location for a diverse range of high quality business activities."*

Of critical importance to the Association and its members is transport through the business precinct, with the efficiency and effectiveness of Ponsonby Road being of paramount importance.

Ponsonby Road is located on the city fringe of Auckland's City Centre. It is around 1.7km in length, running along a ridgeline in a north-south direction from Jervois Road and Three Lamps at the northern end to Great North Road and Karangahape Road at the southern end. Ponsonby Road is an important transport route providing for local connections between the western suburbs and the City Centre. It is a district arterial road that typically carries traffic volumes of around 28,000 vehicles per day. Ponsonby Road also functions as a reputable entertainment and shopping area, serving both the local community and the wider Auckland Region.³

¹ General Manager, *Presentation to PBA Annual General Meeting (August 2013)*, pg 4.

² Ponsonby Business Association, *Strategic Business Plan (2014-2019)*

³ *Ponsonby Road Plan – A Framework for Ponsonby Road 2014-2044*, pages 8, 11 and 18-21.

Submissions

As a significant arterial road corridor, Ponsonby Road presents a number of challenges with the conflicting uses between people and traffic. The Association seeks to nurture, protect and preserve the unique character of Ponsonby Road as well as promote and protect the heritage character buildings and street frontages. With shops and businesses on both sides, crossing Ponsonby Road can be difficult given heavy traffic volumes. In addition, as a successful commercial centre Ponsonby attracts a large number of customers, many of whom travel there by car. There is, however, a limited supply of parking options with most parking being either on Ponsonby Road itself or on the residential side roads leading to it.

The Ponsonby Business Association, *Strategic Business Plan* (2014-2019) identifies the following as key strategies for Pathways to and around Ponsonby:

- Plan for people and places
- Advocate for car-parking
- Investigate better public transport links from Ponsonby to the City
- Undertake research to establish the impact of cycle lanes on businesses

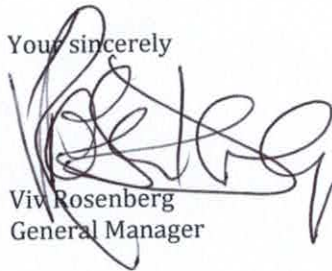
- Advocate for Ponsonby Road being more accessible and safe
- Advocate for direction information signage and business/tenant signage
- Investigate 'Laneways' to encourage pedestrians
- Investigate extending the Wynyard tram to the top of College Hill

- Investigate connecting with the Skypath, Wynyard and Grafton Gully cycle-ways
- Encourage provision of electronic parking availability signage

The Association asks that these key strategies be reflected in the projects and programmes of the Auckland Regional Land Transport Plan 2018-28.

If you have any questions or would like to discuss this further, please feel free to contact us.

Yours sincerely



Viv Rosenberg
General Manager

16 May 2018

Draft Auckland Regional Land Transport Plan 2018-2028
Auckland Council
via email: rltf@at.govt.nz

Feedback on the Draft Auckland Regional Land Transport Plan 2018-2028: Precinct

1. Precinct Properties New Zealand ("Precinct") appreciates the opportunity to provide feedback on the Draft Contributions Policy 2018 ("Draft Policy").
2. Precinct focuses on investment in high quality CBD assets and currently has over \$2b over commercial property located in Auckland and Wellington. In Auckland, assets include the Commercial Bay development, bounded by Queen Street, Customs Street, Lower Albert Street and Quay Street (incorporating the existing Zurich House and HSBC House). Other CBD assets include the PWC Tower and AMP Tower, along with properties located within the Innovation Precinct at Wynyard Quarter.
3. Precinct takes a keen interest in strategic planning in Auckland and has recently been actively involved in the Auckland Plan and Auckland Unitary Plan processes. Precinct has also worked collaboratively with Auckland Council and Auckland Transport for a number of years on the Downtown Framework document as well as working together to deliver the CRL project and street future upgrades to Lower Albert Street and Quay Street.
4. Precinct supports Auckland's quality compact growth model and their investments reflect this. Amongst the appealing attributes of their CBD assets, is their location at the confluence of major public transport infrastructure – Britomart Transport Centre, the Ferry terminals and the soon-to-be-completed bus interchange on Lower Albert Street collectively form a distributed multi-modal transport interchange. Precinct's tenants are well served by the high level of accessibility that this public transport infrastructure provides.
5. Recognising that there is a limited ability to increase the capacity of the CBD's roading network, Precinct firmly believes that the key to successful growth in the CBD is to deliver significant improvements to public transport, as well as additional to infrastructure that supports walking and cycling.
6. To that end, Precinct particularly supports the following projects and submits that funding priority should be given to them:
 - a. Downtown bus improvements (\$39m);
 - b. Downtown Ferry Basin Piers 3 & 4 (\$17m);
 - c. City Centre bus improvements (\$117m);

- d. Wynyard Quarter integrated road programme (\$77m);
 - e. Additional EMU rolling stock and stabling (\$396m);
 - f. Downtown Ferry Basin redevelopment (\$57m);
 - g. Skypath (\$67m);
 - h. Park and Ride Programme and enhanced programme (\$51m and \$119m); and
 - i. Light rail projects (\$1.8b)
7. Precinct understands that it is not intended that hearings be held with respect to the ARLTP, however, if this were to change, Precinct would wish to be heard in support of this submission.



Andrew Buckingham
General Manager - Development

14 May 2018

Auckland Council
Freepost Authority 182382
Private Bag 92 300
Auckland 1142

Email: akhaveyoursay@aucklandcouncil.govt.nz

AUCKLAND COUNCIL DRAFT DC POLICY 2018

1. RECOMMENDATIONS

- 1.1 Thank you for the opportunity to submit on your draft Development Contributions Policy 2018 (DC Policy).
- 1.2 Property Council New Zealand ("Property Council") generally supports Auckland Council's (Council) draft DC Policy. In particular, we support:
 - a. The proposal to average the development contributions charge over the three-year period of the policy;
 - b. Council's efforts to try and ease the concerns associated with when development contribution charges need to be paid. However, we recommend due to administrative issues and for simplification that charging, regardless of whether residential or non-residential developments, be up to 12 months following the issuing of the 224C;
 - c. Better communication between the various departments of Council, due to frustrations felt when payments are sought when the actual approvals or certificates have not yet been received; and
 - d. The amended definition for the single build residential consent containing five or more dwelling units to be treated as non-residential, however, we suggest it be a single build residential '*development*', due to some builds tend to have multiple consents and are likely to fall outside this definition.
- 1.3 However, we are concerned with the lack of transparency associated with the draft policy, and suggest Council consider:
 - a. A full cost allocation of the entire growth-related capital programme and consideration of the real potential development contributions charges for transparency, and consideration of a potential cap following this exercise;
 - b. Slowing the process down to undertake the thorough examination of the entire capital programme (including the brownfields capital projects) and potential charges. Although we recognise this will be a difficult exercise;
 - c. Incentivising the propriety development contribution areas and working closely with central government on the real costs of these areas;

Corporate Sponsors

NATIONAL OFFICE

Foyer Level
51 Shortland Street
PO Box 1033
Auckland 1140

P +64 9 373 3086
F +64 9 379 0781
E enquiries@propertynz.co.nz
propertynz.co.nz



McConnell Property

nomos one
better property software

RLB Rider
Levett
Bucknall

- d. Investigating alternative funding solutions which may become apparent following the full cost allocation process. We are happy to work with Council on developing and advocating for alternative infrastructure tools;
- e. Alternatives to ensure timely approvals and certificates;
- f. Consideration of rebates or remissions on infrastructure that the developer has supplied, and resolve the potential 'double dipping' that is occurring. Or the use of more developer agreements to clearly outline infrastructure to be transferred in lieu of development contribution charges;
- g. Consideration of smaller stormwater areas showing the casual nexus more clearly;
- h. Consideration of stocktake of reserves which clearly understand the current state of reserves and their levels of service; and
- i. Consideration of a more transparent consultation process for the future ensuring Council has clearly met its obligations under the Local Government Act (LGA).

2. INTRODUCTION - AUCKLAND PROPERTY INDUSTRY

- 2.1 The Property industry contributed \$22.8 billion in 2016 to the Auckland economy, with a direct impact of \$10.5 billion (13 per cent of the GDP) and indirect flow-on effects of \$12.3 billion. It employs 53,050 directly which equates to 8 per cent of the total employment in Auckland. For every \$1.00 spent by the Property Industry it has a flow-on effect of \$1.70 to the Greater Auckland region.
- 2.2 The Auckland region's building stock is worth \$176.1 billion. There are almost 500,000 residential dwellings and over 36,000 commercial properties, which includes offices, retail, hotels and industrial buildings.
- 2.3 Auckland's commercial property sector continues to expand to facilitate business and employment growth, with commercial floor space at over 30 million square metres (sqm). In 2016, this included approximately 3.6 million sqm of office floor space, over 16 million sqm of industrial floor space and 3.4 million sqm of retail floor space.

3. INTRODUCTION – PROPERTY COUNCIL

- 3.1 Property Council is a member-led, not-for-profit organisation that represents the country's commercial, industrial and retail developers, property owners, managers, investors, and advisors. Our primary goal is the creation and retention of well designed, functional and sustainably built urban environments that contribute to New Zealand's overall prosperity.
- 3.2 Our members drive economic and social growth; they are the infrastructure that houses the business, residential and commercial property sectors. In Auckland, Property Council has 308 members from across the commercial property sector.
- 3.3 Over the years, Property Council has built and maintained a good rapport with central and local government agencies and is often relied upon for advice, comments and feedback on matters of local, regional and national importance.
- 3.4 Property Council supports statutory and regulatory frameworks that enhance economic growth and development.

3.5 Property Council has reviewed Auckland Council's (Council) draft DC Policy.

4. DEVELOPMENT CONTRIBUTIONS CHARGES

4.1 Property Council notes that the potential charges are to be set at an average of \$27,000, for the three-year period of the policy. We support an increase to an average level of \$27,000 if an adequate cost benefit analysis has been undertaken for the proposed capital projects to be included. We are also very supportive of the consistent approach proposed.

4.2 Council officers have also been very frank with us noting that there is an incomplete list of potential growth projects and that the potential development contribution charges for the fuller programme are likely to be unpalatable. They have even suggested some charges as high as \$120,000, although predominantly an average of \$70,000.

4.3 However, we are concerned that the level of unknowns mean that this is likely to change over the course of the policy. This includes the lack of projects associated with brownfields and that the entire capital programme has not been included. The absence of this more complete information makes it difficult to assess the reasonableness and affordability of the proposed charges and what an appropriate cap might be.

4.4 We recommend that Council consider the full list of capital projects and in the first instance the correct development contribution charges. Council could then consider alternatives to fund the entire programme which we go into more detail below. If not, Council could consider rebates or remissions, similar to Wellington City Council's approach.

4.5 Council officers have also suggested that the cap of \$27,000 is much lower than other councils that they have reviewed. However, our view is that is not necessarily a fair comparison. We note that Auckland Council's DC Policy only covers transport, reserves and stormwater, whereas other councils' development contributions would also include charges for water and wastewater.

4.6 Although Watercare is slightly separate from Council, they have their own Infrastructure Growth Charge (IGC) which must be paid. The IGC is also used for growth-related infrastructure and is applied to all new connections to the water and wastewater networks. We also note that Watercare is currently not charging the full portion of the cost of growth-related infrastructure. They are suggesting they intend to align the costs and benefits of growth-related investment and increase the IGCs over time. This is likely to see further increases for our members.

5. TRANSPARENCY

5.1 As mentioned above, Property Council notes the incomplete capital programme and consequent inaccurate calculation of development contribution charges. We would recommend for full transparency that the entire schedule of the capital programme should be listed and the true nature of the scale of work required to be declared. We question some of the analysis that has been used to prioritise the projects and would like to see the entire capital programme to ensure that the right projects have been included.

- 5.2 Our members are also concerned that the growth apportionment of the capital projects has also not been included and for transparency we suggest that the growth portion of each proposed project be outlined. We note this has been noted for a couple of the proposed projects in Schedule 8.
- 5.3 Property Council suggests that Council has not clearly outlined the total cost of the capital programme required to service the long-term growth required. We are concerned that this will continue to lead to under-investment which is likely to only push out costs into the future. Our members are happy to pay their fair and reasonable share for infrastructure particularly if it will allow infrastructure to be done at scale and pace to meet the demands of development. Improving the detail and transparency around the proposed programme and charges will help give our members confidence that the development contributions they are asked to pay represents both a fair and reasonable share.
- 5.4 We recommend that Council slow the process down to do a more thorough examination of the capital programme and the apportionment of all the potential capital projects. We understand the issues associated with ensuring its alignment with the Long-term Plan but suggest the transparency and accuracy will ensure that Council has met all its obligations under the LGA.

6. BROWNFIELDS

- 6.1 Property Council is concerned with the lack of capital projects outlined for brownfields and this information is unlikely to be available until September 2018. We suggest this could lead to issues and a potential blow-out of charges within the brownfields areas.
- 6.2 We note that under the Unitary Plan it is supposed to be a 70% split in favour of brownfields and question the ability to cap the charges for the urban areas at \$27,000. This is particularly acute when we are aware that the entire schedule of capital projects has not been included.
- 6.3 Property Council notes that in the past there seems to have been a belief that brownfields infrastructure improvements are cheaper than greenfields. However, we agree with Council officers that this may no longer always be the case.
- 6.4 We also suggest that it is more complicated to calculate the growth component, levels of service and those that benefit the most. We recommend that a thorough cost allocation be undertaken, including the depreciation component, of the brownfields projects.

7. PRIORITY AREAS

- 7.1 Property Council notes that the priority development contribution areas are proposed to have a higher charge at \$37,000. We suggest that this is counterintuitive. Development contributions are about growth and can either be an enabler or a disabler of growth.

- 7.2 Council wants developers to be developing in these areas, yet it is making development more expensive, particularly per Household Unit Equivalent (HUE), in those areas. Although we recognise that new infrastructure is needed for these areas, this higher expense is likely to be a deterrent to development in these areas. This could potentially be passed onto the eventual home-owner and cause issues with housing affordability. Council needs to be working more closely with central government outlining the true costs of these areas and consider other options to make the priority areas more attractive to developers and end users.
- 7.3 If Council supports providing for new housing, particularly affordable housing, these are the areas where development needs to be incentivised. However, if this proposal is to try and incentivise brownfields, without the detail associated with the brownfields capital programme this could disincentivise development for both the priority areas and brownfields.
- 7.4 The priority areas are a major goal of both Council and the new Government for the Auckland housing shortage. However, the DC charges in growth areas such as Whenuapai/Redhills are greater.
- 7.5 Property Council again suggests that if a true cost allocation was to be undertaken of the full capital programme some of these charges may not be relevant. Again, we suggest a thorough cost allocation be undertaken.

8. ALTERNATIVE FUNDING SOLUTIONS

- 8.1 Property Council recognises that Council is currently limited in what it can do to raise funds until central government has made some legislative changes. We suggest that the burden of insufficient funding mechanisms under the LGA is leading to a significant ongoing problem for Auckland.
- 8.2 Auckland is going to continue to require significant capital investment over the coming years. We would encourage Council to investigate alternative funding mechanisms as a means of easing this financial burden of rates and development contributions. We suggest these alternative funding mechanisms could be used for the major city projects, infrastructure, services and utilities.
- 8.3 The use of infrastructure bonds, value capture ratings models, tax incremental funding and Public-Private Partnerships are all funding mechanisms that could allow local authorities to reduce their reliance on these traditional funding streams. There are several international examples where these tools have been successful.
- 8.4 Council could also consider advocating central government for taxing the potential use of undeveloped land for both greenfields and brownfields. This approach would ensure a lack of land-banking and likely to raise sufficient funds for future infrastructure, and is also used internationally.
- 8.5 We also note the recent announcement by the NZ Super Fund regarding the Auckland Light Rail network and that it is “an infrastructure project of sufficient scale and significance to be an attractive prospect for investment¹”. This is a clear indication that investing in large scale infrastructure is attractive to investors.

¹ <https://www.nzsuperfund.co.nz/news-media/nz-super-fund-statement-auckland-light-rail-project>

8.6 Property Council is happy to engage with Council in developing and advocating for alternative infrastructure tools with central government. We suggest long term funding solutions are required for long term benefit and are happy to support Council in this endeavour.

9. PAYMENT OPTIONS

9.1 Property Council supports Council's efforts to try and ease the concerns associated with when development contribution charges need to be paid. Council appears to have recognised our concerns, particularly associated with cash-flow and are trying to ease this burden.

Timeliness

9.2 Our members have numerous examples with frustrations and delays. As highlighted at the presentation held on the 7 May, there are significant (up to 6 months) delays with the issuing of the 224C, at the frontend of the development. However, the finance section of Council is chasing developers for payment as soon as the invoice is triggered.

9.3 Property Council suggests greater communication between the different departments within Council may assist in minimising some of these frustrations. We also recommend due to administrative issues and for simplification that charging, regardless of residential or non-residential developments, be up to 12 months following the issuing of the 224C.

9.4 We have also been requesting mandatory timelines for the issuance of certificates with central government. We believe mandatory requirements on Council to issue these certificates and approvals in a timely manner will go a long way towards easing some of our members' frustrations.

9.5 Our members have also suggested solutions to Council to ensure timely approvals, although these have often been declined with insufficient detail associated with why these decisions have been made. Property Council members can lose hundreds of thousands of dollars from these delays and we welcome Council trying to ease this burden. However, we do suggest that Council also consider some of these alternative approaches to ensure approvals and consents are done at pace and we are happy to suggest some options.

Potential 'double-dipping'

9.6 Property Council also notes that members are required to provide infrastructure for their developments as part of their resource consent conditions. Despite this, in our member's experience, Council does not offer a remission or reduction in the development contribution charges to reflect the fact that the developer has supplied the infrastructure.

9.7 This potential 'double dip' needs resolving. The draft DC Policy currently states that Council will pay for these works, however, in practice often does not follow its own policy.

9.8 Property Council notes that the Unitary Plan provisions require property developers to provide for most if not all transport infrastructure associated with the site or development proposal. This raises the prospect of this 'double dipping', while unduly adding risk to development projects.

9.9 Property Council recommends that Council either issue rebates or remissions on these funds or infrastructure. Council could also consider including these transactions with developer agreements covering the various transactions to ensure no 'double dipping' has occurred.

Development groupings

9.10 Property Council also notes the proposal for a single build residential consent that contains five or more dwelling units be treated as non-residential. We suggest this is unlikely to work in practice as these builds tend to have multiple consents and are likely to fall outside this definition. We suggest the definition be that if a single build residential '*development*' contains five or more dwelling units it be considered non-residential.

10. POLICY DEVELOPMENT PROCESS

10.1 Property Council suggests that the process developing the policy has been undertaken too quickly. We note that the true nature of the brownfields capital programme is unlikely to be finalised until September 2018 and that none of this work has yet been started.

10.2 We are concerned that due to the change of government and the re-prioritisation of projects, particularly the transport programme, that the draft DC Policy has been fast-tracked.

10.3 We recommend that Council slow the process down and do a more thorough and aligned policy. This would also ensure that all the relevant requirements of the LGA would be met, ie a thorough schedule of costs, apportionment of growth and a truer representation of the of potential demand on the HUE and other non-residential developments. We recognise that this is a time-consuming process but would be satisfied knowing that a thorough process had been undertaken prior to policy being implemented.

10.4 Property Council also notes the potential changes to the LGA regarding development contributions and reinstating charging for other services such as libraries etc. We would not support these being included again as it is difficult to show the casual nexus between these supplementary services and growth.

11. STORMWATER FUNDING AREAS

11.1 Property Council notes the proposed funding areas for stormwater. We suggest a lack of casual nexus (as required by the LGA) between the proposed stormwater projects and proposed areas, with some of the areas being too big to suggest a relationship. We recommend that the areas be reduced to show a clearer link between the projects proposed and their charging areas.

12. RESERVES

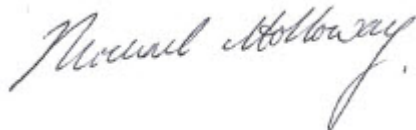
12.1 Property Council is also concerned with the lack of detail associated with reserves. We suggest that a lack of understating of current reserves and their levels of service required means that Council is unable to adequately calculate the reserves development contribution charges.

12.2 We recommend that a thorough stock take of the relevant reserves be undertaken to adequately calculate the potential reserves development contribution charges.

13. CONCLUSION

- 13.1 Property Council supports the proposal for more consistency and the average increases in the development contribution charges. However, we are concerned about the analysis that has been used to calculate these charges.
- 13.2 We have made suggestions and recommendations based on the assumption that Council has seen the entire proposed capital programme and an adequate prioritisation of the required capital projects has been undertaken. However, we are concerned this may not have been fully undertaken.
- 13.3 Property Council is also concerned with the new consultation process that Council has been undertaking for this Long-term Plan 2018/28 and supporting policies, including the draft DC Policy. We do not believe it has met the requirements of section 83 of the LGA and suggest formal hearings should have been undertaken. We suggest these information workshops held prior to the formal consultation period finishing is concerning, particularly with the DC Policy having such a short period of time for consultation.
- 13.4 The DC Policy as you will be aware is of significant interest to our members and only two weeks does not adequately allow us to truly canvas our members for our position.
- 13.5 Property Council was heard in support of our submission. However, some of the information contained in our presentation was hastily produced given the short timeframes and done before written submissions were completed and therefore some parts are likely to differ from some of our information contained in this submission. We suggest again this has not met the requirements of section 83.
- 13.6 We have also noted some differences between the presentation given by officers on the 7 May 2018 and what has been included in the written draft DC Policy and its statement of proposal. These differences may be due to the haste at which this policy has been produced, but it creates some confusion about which information is correct.
- 13.7 Should you require any further information do not hesitate to contact Jane Budge, Senior Advocacy Advisor, Property Council New Zealand – jane@propertynz.co.nz.

Yours faithfully



Michael Holloway
Auckland Branch Executive President
Property Council New Zealand

14 May 2018

Auckland Council
Freepost Authority 182382
Private Bag 92 300
Auckland 1142

Email: akhaveyoursay@aucklandcouncil.govt.nz

AUCKLAND COUNCIL REGIONAL FUEL TAX PROPOSAL

1. INTRODUCTION - AUCKLAND PROPERTY INDUSTRY

- 1.1 The Property industry contributed \$22.8 billion in 2016 to the Auckland economy, with a direct impact of \$10.5 billion (13 per cent of the GDP). It employs 53,050 directly which equates to 8 per cent of the total employment in Auckland. Auckland region's building stock is worth \$176.1 billion and there are almost 500,000 residential dwellings and over 36,000 commercial properties, including offices, retail, hotels and industrial buildings.
- 1.2 Property Council is a member-led, not-for-profit organisation that represents the country's commercial, industrial and retail property owners, managers, investors, and advisors. In Auckland, we have 308 members and our primary goal is the creation and retention of well designed, functional and sustainably built urban environments that contributes to New Zealand's overall prosperity.

2. REGIONAL FUEL TAX

- 2.1 Property Council has reviewed the proposed Regional Fuel Tax initiative.
- 2.2 We note that congestion is costing approximately \$1-2 billion per year in lost productivity despite increased public transport usage. We also note the new Government's commitment to deliver the entire Auckland Transport Alignment Project (ATAP) programme within the next ten years. We are very supportive of delivering the entire programme quickly to combat Auckland's current issues with congestion.
- 2.3 Property Council supports the regional fuel tax, for only 10 years, and that these funds be used for the regional transport projects and the proposed alternative public transport modes. We have also noted the proposed regional fuel tax is likely to generate about \$1.3 billion per year and that it also increases the borrowing ability to ensure the entire proposed programme is completed.
- 2.4 We support this integrated approach proposed and look forward to working with Council and central government on the programme of works. We are also very supportive of major transport projects particularly those that will increase urban regeneration, such as intensification around transport hubs and the light rail along Dominion Road.
- 2.5 However, we suggest that this not become a permanent revenue stream for charging transport users. We note it is a blunt instrument and could have unintended consequences of neighbouring districts becoming more competitive.

2.6 We suggest that the issues Auckland Council is currently grappling with are of national significance. We support, as mentioned in our other submissions for the Long-term Plan 2018/28 and draft Development Contributions Policy, the wider investigation into alternative funding approaches for infrastructure and as a key stakeholder we are happy to assist in this exploratory work. We are also happy to support Auckland Council in advocating to central government for these alternative funding solutions.

3. CONCLUSION

- 3.1 Property Council supports the new regional fuel tax initiative.
- 3.2 Property Council was heard in support of our submission. Although due to timing of the hearings, some of our comments may differ to our submission. Again, as mentioned in our draft Development Contributions Policy submission we have been concerned with the new direction used by Council for its supporting consultation hearings. In future we suggest that the hearings be held following the closing date of submissions to ensure an accurate reflection of our submission.
- 3.3 Should you require any further information do not hesitate to contact Jane Budge, Senior Advocacy Advisor, Property Council New Zealand – jane@propertynz.co.nz.

Yours faithfully



Michael Holloway

Auckland Branch Executive President
Property Council New Zealand



15 May 2018

Auckland Regional Transport Committee
C/O Auckland Council
Private Bag 92300
Auckland 1142

rltp@at.govt.nz

Copy to: Whau Local Board

whaulocalboard@aucklandcouncil.govt.nz

Submission to Proposed Regional Fuel Tax and Draft Auckland Regional Land Transport Plan 2018-28

Introduction

The Rosebank Business Association welcomes the opportunity to make this submission to the draft Auckland Regional Land Transport Plan 2018-28.

The Rosebank Business Association ('Association') supports the submission of AKBIDS – the Business Improvement Districts of Auckland, but wishes to make the following more specific submissions relating to the Rosebank area.

The Rosebank Business Association ('Association') is the Business Improvement District and business association for the area. The Rosebank Business Improvement District is a commercial and industrial hub of 450 businesses located on the Rosebank Peninsula in the West Auckland. It has direct access to the SH16 North-Western Motorway and once the Waterview tunnel is completed, will link to the SH20 Airport Motorway. Businesses in the area generate an estimated \$1 billion in revenue, pay rates of \$4.5 million and employ about 8,000 people. The predictions are that this workforce will increase to 20,000 by 2025.

Of critical importance to the Association and its members is transport through the business precinct, with the efficiency and effectiveness of Rosebank and Patiki Roads (and their connections to SH16) being of paramount importance. Also of importance is that the Precinct be well served by public transport.

Submissions

Rosebank and Patiki Road Corridor Improvements

Of considerable concern to the Association is that the draft Auckland Regional Land Transport Plan 2018-28 states that the Rosebank Road upgrade (upgrading the existing Rosebank Road to improve vehicle and freight access to and from State Highway 16 costed at \$36M) is scheduled as unfunded.

This is contrary to the emphasis in the RLTP on road corridor improvements to address congestion on the arterial network, especially congestion on the freight network.¹ It is also contrary to the need for network capacity and performance improvements, so that better use is made of the existing transport system to increase the number of people who can travel through key routes and corridors. This must include the efficiency and coordination of traffic signals being improved to enhance throughput and reduce delays as well as the introduction of more dynamic traffic lanes to improve peak traffic flows, and give priority to freight movements on key freight connections.²

In particular, the Association wishes to see real improvements for Rosebank in terms of traffic management. One issue of importance is for Auckland Transport and Auckland Council to make a decision about road widening. We understand that the ordinance for this is in place. While this would require removal of the flush median, we feel this option has come to the end of its useful life. At peak traffic times the pace of traffic is very slow. Even outside these hours, traffic travels at around 40km/hr. The ability to exit driveways is now almost impossible without taking risks. Our view is that this must be resolved. There may also be opportunities for safety signage to be displayed in the immediate term. We also ask for a genuine extra northern lane in Patiki road be created to help alleviate the Rosebank roundabout congestion, which proceeds down to the motorway via the ramp metering process. We ask for urgent and serious consideration being given to the introduction of a dynamic traffic lane on Patiki Road to improve peak traffic flows.

The Association asks that the Rosebank Road upgrade signalled in the RLTP (upgrading the existing Rosebank Road to improve vehicle and freight access to and from State Highway 16 costed at \$36M) be funded in this RLTP period from 2018-2028.

Public Transport – Light Rail on Northwest Corridors

On the issue of public transport, the Association has supported and promoted the new 138 AT bus-link from New Lynn via Rosebank to Henderson and its return. The Association would like to work with Auckland Transport to ensure public transport to and through Rosebank is efficient and effective.

Also on public transport, we note the introduction of a new bus network for West Auckland. There are over 8,000 FTEs working in Rosebank and the second largest secondary school in NZ, Avondale College, is close by. The new bus network must link with the Avondale Train network.

However, of most significance is the proposal for Light Rail along SH16. The RLTP notes that Light Rail is proposed to the north-west to support substantial growth along the corridor and in the broader North West, to address the projected decline in employment access, to provide a travel alternative to congestion on State Highway 16, and to improve public transport mode share.

The RLTP also notes that rapid transit along the Northwest corridors will require significant investment, but also provides a substantial opportunity to explore third party funding and financing arrangements. An allocation of \$1.8 billion is proposed as part of ATAP which will be used to leverage funding and financing to progress both corridors over the period of this RLTP.

¹ See *Draft Auckland Regional Land Transport Plan 2018-28*, page 45.

² See *Draft Auckland Regional Land Transport Plan 2018-28*, page 40.

One concern we have is that there is no marked Light Rail station at Rosebank, despite the need to address the projected decline in employment access

The Association asks that the proposal for Light Rail along SH16 include a station to service the Rosebank employment area.

If you have any questions or would like to discuss this further, please feel free to contact us.

Mike Gibson
General Manager

gibo@rosebankbusiness.co.nz

**SUBMISSION TO
AUCKLAND COUNCIL
ON THE REGIONAL FUEL TAX PROPOSAL**

Sam Warburton
Economist and Research Fellow
The New Zealand Initiative

About the author

1. I am an economist with fourteen years' experience in various policy roles, all with significant economic and regulatory impact analysis components.
2. I was employed in the Ministry of Transport's Funding and Infrastructure team for four years until August 2017, which included dealing with tax and expenditure policy. I have advised on three Government Policy Statements (GPS) on land transport: GPS 2015, the draft GPS 2018 for the then National-led Government, and the draft GPS 2018 for the now Labour-led Government.
3. This year, I will be producing a report under The New Zealand Initiative banner on the problems with current transport funding, planning and expenditure policies. This will be followed by a report on how to reform the sector.
4. During my studies, I was awarded the New Zealand Association of Economists & Treasury Scholarship, and all of Victoria University's prizes for economics and public policy at the time, including the School of Economics and Finance Prize in Economics, the Jan Whitwell Prize for Monetary and Macroeconomics, and the Civil Service Institute Prize in Public Policy and Public Administration.

Disclaimer

5. This submission is mine. Views expressed are mine and do not necessarily reflect the views of The New Zealand Initiative, its staff, advisors, members, directors or officers.

My general position on regional fuel taxes

6. The Council proposes to levy a regional fuel tax as, essentially, a partial replacement of other local authority revenue tools – primarily property rates.

7. Because of a lack of information in the Council's four-page consultation document or in the Ministry of Transport's regulatory impact statement accompanying the Bill, I am neutral on regional fuel taxes versus property rates. Too much is uncertain, particularly around the impacts of continuing with rates as a source of funding.
8. There is, however, more than enough information in my research to show that fuel tax is inequitable and grossly regressive and should be replaced by new funding sources including congestion and road pricing at the earliest possible opportunity.
9. Whichever are ultimately used – regional fuel taxes or rates – they should continue only as a short-term measure before better funding sources are implemented.
10. The Council is proposing to implement a regional fuel tax for 10 years, and that this might be renewed as per the Bill. Congestion and road pricing could be implemented in a few years. To encourage government and the Council to transition as quickly as possible to these sources, I propose that the maximum limit for the regional fuel tax be 4 years renewable only if there are good reasons not to implement congestion and road pricing.

Summary of problems with the Council's consultation document and the Ministry of Transport's regulatory impact statement

The Council's consultation document

11. The Council's consultation document¹ runs to a mere four-pages. The document is woefully inadequate as a resource to consult on.
12. The crux of the Council's argument is that it is unfair for ratepayers to pay for transport that they might not use, but does not consider at all whether it's unfair to overtax the poor just because they have less fuel-efficient vehicles.
13. Nor does it consider any of the issues considered by the Ministry of Transport attempts, to varying degrees of success, to analyse. Because of the lack of analysis by the Council, I use the Ministry of Transport's regulatory impact statement as the basis of this submission.

¹ <https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/transport-consultation/Documents/summary-of-rftp-overview.pdf>. (Excluding the document listing projects revenue from any source would be spent on.)

The Ministry's regulatory impact statement

14. I have serious concerns with the regulatory impact statement which is attached to the Bill and which Ministers, MPs, and Councillors have used to form their views on the relative merits of a regional fuel tax. The regulatory impact statement was prepared by the Ministry of Transport and assessed by the Treasury's Regulatory Quality Team as meeting Quality Assurance criteria.
15. I was previously employed by the Regulatory Quality Team when it was housed in the then-Ministry of Economic Development. I would have assessed the proposal as not meeting the Quality Assurance criteria for the reason that it cannot be relied upon to reasonably accurately inform Government's and Parliament's deliberations.
16. Among other issues, the regulatory impact statement:
 - overplays the evidence for price-spreading and under-commits to activities that would mitigate price-spreading and improve the effectiveness of regional fuel taxes
 - ludicrously exaggerates the risk of black markets forming
 - underplays the impact of fuel tax on low-income people
 - sets out its analysis in such a way as to be almost incomprehensible in key parts
 - wrongly assesses the merits of some options, and
 - fails to recommend other options which Parliament could have legislated for, complementing regional fuel taxes.

Structure of this submission

17. While regional fuel taxes are superior to property rates in some regards (e.g. if you drive more, you pay more towards the maintenance and improvement of roads), and inferior in others (e.g. regional fuel taxes mean poorer people with less fuel-efficient cars pay more, against rates which generally charge wealthier people more). The best option, therefore, comes down to how much you weight those criteria.
18. Though I am neutral on regional fuel taxes, the Council should base their decision on accurate information. The Council's own consultation document contains almost no useable analysis and the Ministry's regulatory impact statement lacks vital information and is wrong in many important areas. My submission:

- describes current transport funding policy, busts a few myths, and then describes how transport funding should ideally work
- corrects many aspects of the Ministry of Transport's regulatory impact statement upon which Ministers, Parliament, the Council and the public will have relied in forming views, and advises on what that means the Council
- offers other amendments.

19. The submission is divided into the following sections:

1. Things everyone involved in transport policy should understand
2. The inequitable impact of fuel taxes, particularly on poor people
3. One reason why Governments, Councils and their agencies love fuel tax
4. The multiple errors of the Ministry of Transport's assessment of options
5. Price-spreading
6. Tax evasion and black markets
7. How in love with cars are New Zealanders really?

20. Sections 1 to 4 are directly relevant to the Council.

21. Sections 5 to 7 are reproduced from my submission to the Select Committee and included for the Council's interest, even if the Council has little control over these matters.

My recommendations to the Committee

22. Sections 2 contains recommendations to the Council.

23. Sections 4, 5 and 6 contain recommendations I made to the Select Committee hearing the Bill. I include these because, even if the Council does not have responsibility for these aspects, the recommendations go to the workability of regional fuel taxes or to the analysis of the relative merits of regional fuel taxes.

24. The recommendations are replicated below for ease of future reference:

2. The inequitable impact of fuel taxes, particularly on poor people

- **The Council and the Select Committee should** amend the period for which regional fuel taxes apply from 10 years to 4 years, renewable only if there is not good reason to implement congestion and road pricing.

- **The Select Committee should**, if congestion and road pricing has not been legislated for by the end of those four years, ask the Ministry of Transport to provide the Committee advice on transitioning from petrol excise duty to road user charges.
- **The Council and the Select Committee should** ask the Ministry of Transport and Ministry of Social Development to provide advice on what additional income support could be provided to disadvantaged people most adversely affected by regional fuel taxes.

4. The multiple errors in the Ministry of Transport's assessment of options

- **The Select Committee should** note that if regional fuel taxes do not pass into law, the status quo is not that the Auckland Transport Alignment Project and other transport projects do not go ahead, but that Councils will use rate increases, debt and, perhaps, defer some projects (including non-transport projects) instead.
- **The Select Committee should** note that correcting in Ministry's errors would lead to tolling (and other congestion and road pricing options) being more positively assessed and regional fuel taxes (and fuel taxes in general) being more negatively assessed.

5. Price-spreading

- If the Commerce Act amendments currently before Parliament pass, the Commerce Commission will have greater power to investigate potential competition issues through a Market Studies Power. **The Select Committee could** recommend that the Minister of Commerce ask the Commerce Commission to use its new power to investigate the fuel market.
- The Ministry has little in the way of a plan for monitoring price-spreading and responding accordingly. Such monitoring will be necessary before the Commerce Commission can complete its investigation, or if an investigation into the fuel market is not a priority for the Commission. **The Select Committee could** ask the Ministry to prepare and implement a proper monitoring regime, and to regularly report to the Committee on how regional fuel markets respond to regional fuel taxes.

63. Tax evasion and black markets

- **The Select Committee could** consider whether the fine for tax evasion is high enough and seek more advice from the Ministry.
- **The Select Committee should** disregard any concern about black markets forming.

1. THINGS EVERYONE INVOLVED IN TRANSPORT POLICY SHOULD UNDERSTAND

1.1. CURRENT TRANSPORT FUNDING ARRANGEMENTS

25. The National Land Transport Fund (NLTF) is made up of revenue from:
- fuel excise duty – currently 59.524 cents per litre
 - road user charges – varies by vehicle weight and configuration; for example, a light diesel vehicle (3.5 tonnes or less) pays \$62 per 1,000 kms, while an 8-axle truck pays at least \$333 per 1,000 kms
 - motor vehicle registration – a fixed annual fee per vehicle.
26. A regional fuel tax of 10 cents a litre would increase the per litre charge on petrol to 69.524 cents (and to about 79.524 cents with the proposed national fuel tax increase), and introduce a per litre charge on diesel of 10 cents.
27. There has been some suggestion – from the Taxpayers’ Union, from Judith Collins, even recently from the Ministry of Transport – that fuel excise duty and road user charges should only be spent on roads or things that benefit drivers.
28. This view is mistaken.
29. Apart from state highway maintenance and improvements, most all other transport expenditure from the National Land Transport Fund is matched close to 1 to 1 from rates including local road maintenance and improvements, public transport (which is about half funded from users), and walking and cycling.
30. Many ratepayers drive very little, or not at all.
31. A commitment to only spend road taxes on roads would commit ratepayers to only spend their contribution on roads. This would be a massive subsidy to road users.
32. While motorists might pay for some projects they don’t benefit from (e.g. a driver in Southland paying for public transport in Wellington), ratepayers might pay for projects they don’t benefit from (e.g. people who walk to work in Wellington paying for roads people use to drive to work in Wellington).
33. Governments have to be mindful of this balance when deciding how to set taxes, rates and public transport fares and in divvying-up expenditure.

1.2. HOW TRANSPORT FUNDING SHOULD WORK

34. Instead of everyone paying a bit towards projects they don't really want, people should pay for the projects they do want.

User pays

35. Motorists should pay for roads. Public transport users for public transport. Walkers and cyclists – well, it'd be hard to get them to pay, so funding for that will likely always come from rates. These charges would also vary by region, or local authority, so that, for example, people in Canterbury where it is cheaper to put in transport, don't subsidise people in Wellington where it is more expensive. This is a user-pays approach. For roads, it is known as 'road pricing'.

Congestion pricing

36. Instead of motorists subsidising public transport for the congestion relief benefits, there should be congestion charges. The problem with public transport subsidies from motorists is that they have to be paid to everyone who uses public transport, even the ones who would always use public transport even if they were paying the full price.
37. Consider an example of lowering public transport fares to encourage people off the roads and onto trains and buses. Because you can't tell who's newly off the road and who was already using public transport, you must lower fares for all users. You will succeed in getting some additional people off the road, but it'll cost you in terms of paying everyone who uses public transport, not just the additional people.
38. Congestion pricing – an extra charge on road users if they want to travel at peak/congested times – encourages people to take public transport or travel at a different time of day. It gets the same behaviour change, but at a much lower cost. Further, the revenue from the congestion charge can be used in any number of ways including:
- compensating low-income people for the higher cost of travel if they have to keep driving, or the inconvenience of changing modes or travelling at a different time of day
 - providing more public transport, walking and cycling, or roads
 - lower public transport fares or road taxes
 - anything else.

Social provision of transport

39. What then of public transport for social welfare reasons / providing choice to those who have little choice or limited means?
40. As above, the revenue from congestion charging can be recycled to leave the poor no worse off (or even the rich no worse off if you wish).
41. Other than that, transport social welfare should be provided by the Crown as other social welfare programmes like subsidised health and education are. We have a progressive income tax and social welfare system that taxes the rich a bit more in order to support the poor.
42. It is inappropriate to use fuel taxes – a regressive tax; one that is paid disproportionately by the poor – to provide social welfare transport to the poor.
43. Nor is it appropriate to tax a subset of society – motorists – to pay for social welfare transport. The Council says it's fairer that road users pay for the bus improvements planned for the Regional Fuel Tax. But this is only true if the bus improvements are only about congestion relief. If the bus service improvements are about social transport access as well, then it is not fair to tax a narrow subset of society, and this should be funded from general rates or general taxation instead.
44. Motorists should pay for their costs of transport. New Zealand society should pay, and the rich among society a bit more, for social welfare transport.

Overall

45. While people can legitimately favour regional fuel taxes or rates depending on their preferences and concern for different 'winners' and 'losers' from each, the approach outlined above of congestion pricing, road pricing, and Crown or ratepayer funding for social welfare reasons is as close as any policy gets to an 'everybody wins' solution.
46. The Council should work with Government to see it implemented as soon as possible.

1.3. HOW TRANSPORT FINANCING CURRENTLY WORKS

Central Government

48. Road taxes are ring-fenced (also known as 'hypothecated') for land transport expenditure. Funding ranges for different types of expenditure – public transport, state highway improvements – are set in the Government Policy Statement on land transport. Taxes are set by regulation.
49. Being largely outside of the normal Budget process, there is less scrutiny of taxes and expenditure. The Ministry of Transport advises Ministers, but it's not in the context of competing uses of tax revenue from other Votes and the process attracts little interest from Treasury.
50. Because of the lack of scrutiny and to protect against overly political decision-making, transport is funded on a pay-as-you-go basis – capital expenditure is paid for when it is undertaken by today's motorists and ratepayers, not over the lifetime of the asset as businesses or households might normally do (such as with home loans).²
51. Lots of expenditure is planned in the next few years, particularly in Auckland, that will last decades and lifetimes. Burdening today's road tax and ratepayers with all of that cost rather than spreading the cost over the lifetime of the asset is both inefficient and inequitable. It's a high price we pay because we can't trust politicians to make good investments.

Local government

52. While councils do usually finance transport investment through borrowing, Auckland council is currently targeting a self-imposed limit on borrowing of 270% of operating revenue beyond which, the Council says, credit agencies would downgrade Auckland Council from its AA rating.
53. Transferring the burden from Councils to ratepayers and motorists, of course, doesn't really reduce the risk of higher borrowing costs to Auckland as a whole – it just transfers it from the Council to households, many of whom with house prices where they are, will have borrowing of 1,000% of income.

² There are a handful of exceptions with some projects financing through borrowing from the Crown or public-private partnerships (PPPs).

1.4. HOW TRANSPORT FINANCING SHOULD WORK

54. Capital expenditure on transport should be paid off by all who use it, not just today's motorists and ratepayers.
55. In the medium-term, this could be achieved through an overhaul of transport planning – reducing the potential of political decision-making and increasing the chance that transport investments accurately reflect what users want.
56. But something could also be done now.
57. The current Labour-led Government has a lot in common with the previous National-led Government when it comes to the Auckland Transport Alignment Project (ATAP). There are differences around a handful of major projects, but a Labour-revised ATAP in 2018 will look, in large part, quite similar to the one National agreed to in August 2017.
58. If there's broad political consensus on many of these train, bus and road projects, why not finance them with debts or public-private partnerships and spread costs over time? The answer is probably the Government's commitment to its debt-to-GDP target, the Budget Responsibility Rules, and the Auckland Mayor's commitment to limited rates increases. Unfortunately, all these targets and rules do with regards to the issue of transport funding is shift the credit risk from Government to households.

2. THE INEQUITABLE IMPACT OF FUEL TAXES, PARTICULARLY ON POOR PEOPLE

2.1. SUMMARY

59. The Council makes no mention of the impact on poor people in its consultation document.

60. Equity issues are mostly discussed on pages 24 and 28 of the regulatory impact statement.

- The Ministry of Transport makes only a brief mention of the impact on poor people of a regional fuel tax.
- The Ministry only says that that negative impacts on the poor ‘may’ or ‘could’ happen.
- The Ministry makes no attempt to quantify the extent of these impacts.
- Fuel tax is inequitable and grossly regressive. My analysis shows:
 - There are big inequities in the amount of tax drivers in general pay.
Drivers of vehicles that are among the 10% least fuel efficient pay more than double the tax per kilometre of drivers of vehicles that are among the 10% most fuel efficient.
 - Poor rural areas subsidises rich urban areas.
Wairoa is the most over-taxed, paying 9.3% more tax per kilometre drive than New Zealand as a whole. Wellington city is the most under-taxed, paying 5.7% less tax per kilometre.
 - Within regions, Māori, the unemployed and sole parents are more likely to be over-taxed.
For example, 30% of Māori households are overtaxed by 25% or more, compared to 16% for New Zealand as a whole.
 - The dollar value of over-taxation is already high from existing fuel taxes and will get worse under the Government’s proposals.
Currently, households with vehicles that are among the 10% least fuel efficient pay between about \$1,385 and \$1,490 per annum. If they were paying based on the kilometres they drive, they’d be paying \$950, or about \$500 per annum less.
 - A regional fuel tax in Auckland of 10¢ combined with the likely nation-wide increase of about 10¢ will increase the amount a low fuel-efficiency vehicle pays by between \$440 and \$470 per annum. If they were paying based on the kilometres they drive, they’d be paying \$320 per annum.
Māori, the unemployed and sole parents are more likely to pay this level of tax than others. These same groups also drive more than others.

- The inequity and regressivity of fuel taxes means, if regional fuel taxes are to be implemented, they should be only for the short-term until other revenue sources such as congestion and road pricing are implemented.
- **The Select Committee should** amend the period for which regional fuel taxes apply from 10 years to 4 years, renewable only if there is good reason not to implement congestion and road pricing.
- **The Council should** apply to the Government for a regional fuel tax for 4 years, not 10, and renewable only if there is good reason not to implement congestion and road pricing.
- **The Select Committee should**, if congestion and road pricing has not been legislated for by the end of those four years, ask the Ministry of Transport to provide the Committee advice on transitioning from petrol excise duty to road user charges.
- **The Council and Select Committee should** ask the Ministry of Transport and Ministry of Social Development to provide advice on what additional income support could be provided to disadvantaged people most adversely affected by regional fuel taxes.

2.2. WHAT DOES THE MINISTRY SAY ABOUT THE DISTRIBUTIONAL IMPACTS OF A REGIONAL FUEL TAX?

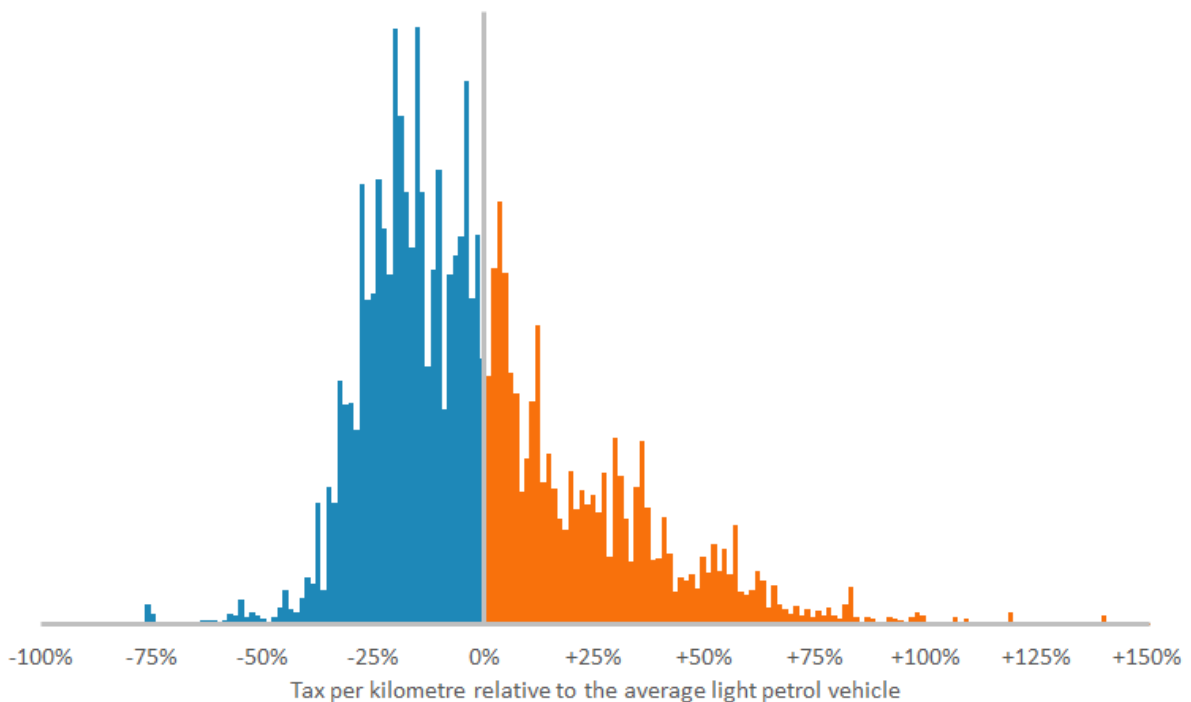
61. The regulatory impact statement says more about the inequitable impacts of a regional fuel tax that would arise from price-spreading (residents in regions without a regional fuel tax paying higher prices) than it does about the impact on poor people.
62. The Ministry notes Darryl Evans of Mangere Budgeting and Family Support saying that poor people will be most affected by a regional fuel tax because of the distances they drive. The Ministry also notes that 'lower income households are less likely to own newer more fuel efficient vehicles or electric vehicles' and would, therefore, pay more tax per kilometre driven.

2.3. THREE TYPES OF INEQUITY

A general inequity

63. Operators of light diesel vehicles (cars, vans, utes) all pay the same tax of 6.2 cents per kilometre. The amount that operators of light petrol vehicles pay depends on the vehicle's fuel efficiency, which varies widely. Figure 1 shows the distribution of under- and over-taxation for light petrol vehicles.
64. That many people can pay 25% less tax and others 50% more per kilometre is inequitable.

Figure 1: Under- and over-taxation of fuel excise duty for light petrol vehicles



Regional fuel tax versus rates

65. It's possible to argue that a regional fuel tax is fairer than rates if people who drive more pay more for the maintenance and improvement of roads. It's possible to argue that rates are fairer than regional fuel taxes if rates raise more revenue from richer households than poorer households.
66. What people consider is fair depends on the extent of, and how much they weight, each of those aspects. Unfortunately, the regulatory impact statement contains almost no assessment of the magnitude of these relative aspects. This makes it very difficult for Parliament and society to decide the best course of action.

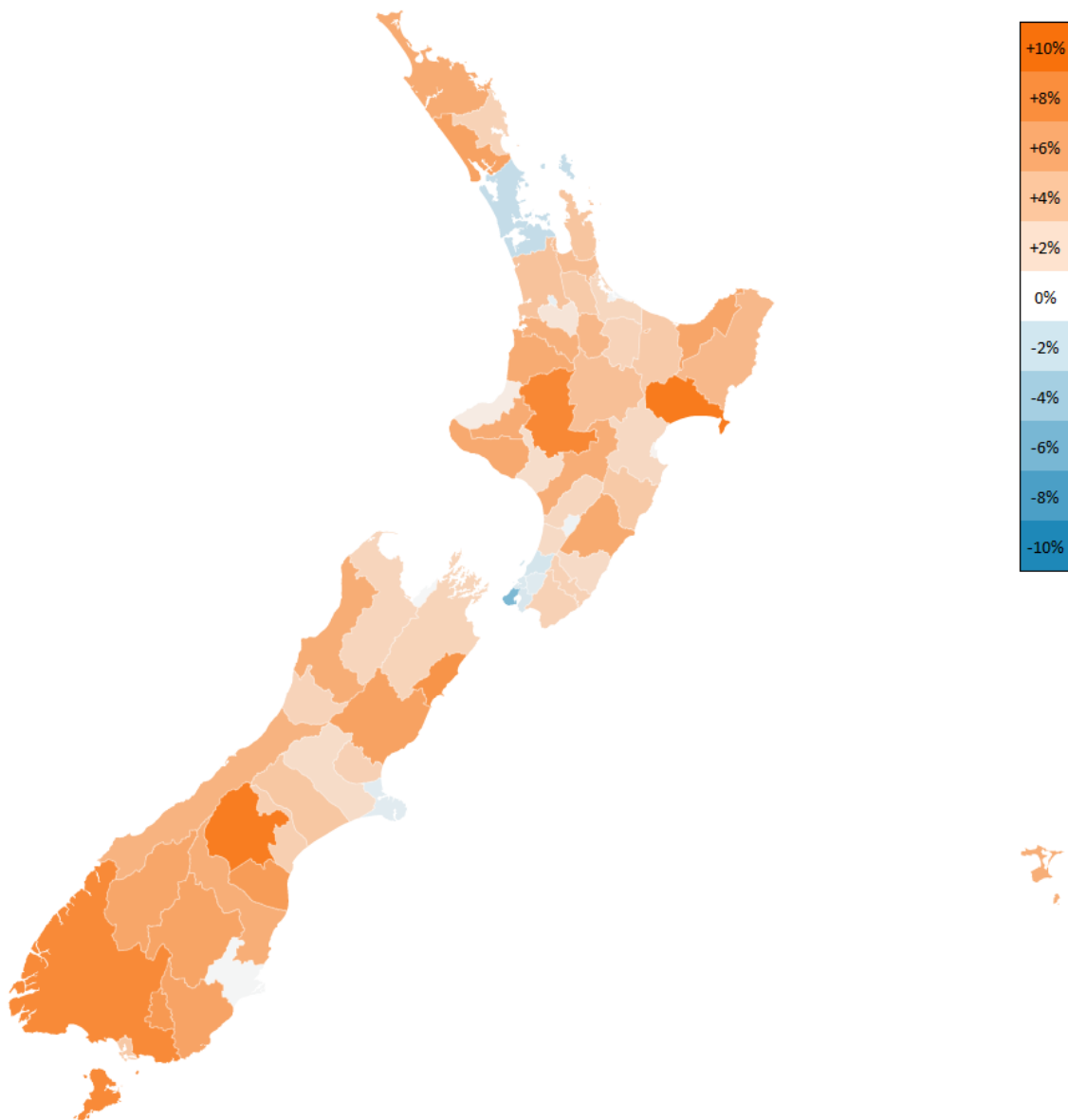
The burden of fuel taxes falls disproportionately on the poor

67. It is not possible to argue that a regional fuel tax is fair when it charges poor people with less fuel-efficient cars more than rich people with more fuel-efficient cars.
68. Unfortunately, neither the Council nor the Ministry have quantified the magnitude of this inequity.
69. I have.

2.4. POOR RURAL AREAS SUBSIDISE RICH URBAN AREAS

70. According to my analysis of data supplied by the NZ Transport Agency and the Ministry of Transport, poor rural regions subsidise a handful of rich cities.
71. Figure 2 shows the average fuel excise duty paid per kilometre compared to a vehicle with the national-average fuel efficiency. That is, vehicles with average fuel efficiency pays no more or less tax than the average vehicle, while those with higher/lower fuel efficiency pay less/more tax.

Figure 2: Under- and over-taxation of fuel excise duty by territorial authority



72. Wellington city is the most undertaxed territorial authority, paying 5.7% less tax per kilometre than the national average Wairoa is the most over-taxed paying, 9.3% more tax per kilometre than the national average.
73. Only 12 territorial authorities are undertaxed. The twelve can be characterised as relatively affluent cities with more transport choices (such as public transport should people not wish to pay higher fuel taxes).
74. Fifty-five of the 67 territorial authorities are over-taxed and are relatively low-income. Low - income areas of New Zealand are subsidising high-income areas.
75. Table 1 lists the 12 under-taxed territorial authorities, their level of under-taxation and their household incomes. Table 1 also lists the 12 most over-taxed territorial authorities.

Table 1: Dozen most under- and over-taxed territorial authorities

Twelve under-taxed			Twelve most over-taxed		
Territorial authority	Tax	Income	Territorial authority	Tax	Income
Wellington	-5.7%	+42.8%	Wairoa	+9.3%	-33.5%
Auckland	-2.3%	+19.9%	Mackenzie	+9.1%	-13.6%
Kapiti Coast	-1.6%	-16.3%	Ruapehu	+8.3%	-30.4%
Lower Hutt	-1.4%	+8.9%	Southland	+8.1%	0.0%
Porirua	-1.3%	+23.7%	Kaikōura	+7.4%	-22.1%
Upper Hutt	-1.1%	+7.2%	Gore	+7.0%	-14.6%
Christchurch	-1.0%	+2.4%	Waimate	+6.8%	-24.6%
Hamilton	-0.6%	+0.3%	Hurunui	+6.3%	-11.6%
Palmerston North	-0.4%	-8.3%	Kaipara	+6.3%	-33.5%
Tauranga	-0.3%	-12.5%	Clutha	+6.2%	-12.7%
Dunedin	-0.1%	-14.7%	Central Otago	+6.2%	-14.1%
Nelson	-0.0%	-14.9%	Ōpōtiki	+6.1%	-36.8%

76. The territorial authority data shows that fuel excise duty is regressive: lower-income people pay more tax per kilometre. But territorial authority data also hides wide differences within territorial authorities.

2.5. POORER, AND MORE AT-RISK HOUSEHOLDS, ARE OVER-TAXED AND SUBSIDISE RICHER HOUSEHOLDS

77. Within regions, Māori, the unemployed and sole parents are among those who are over-taxed and subsidising others. This accords with what we would expect: those on lower-incomes³ cannot afford more fuel-efficient vehicles⁴, and those with bigger families need bigger, less fuel-efficient vehicles.
78. Figure 3 shows who pays the most and least tax per kilometre by family type, ethnicity, and employment status.⁵ The first table suppresses results where there are fewer than 30 households (below which you would be concerned about data reliability). The second table relaxes the suppression to fewer than 10 households. The additional results in the second table will not be statistically sound, but are consistent with other results and what we would expect.
79. Families with at least one Māori person pay, on average, 14% more tax than the average New Zealand Household. Households with at least one unemployed person and at least one child pay 6% more. Sole parents pay 5% more.
80. The inequity is magnified if we also worry about how much people drive. Māori households drive the vehicles they own 7% more than others; the unemployed 3% more; and sole parents 28% more.

³ Ministry of Transport survey data about incomes was not good enough to use, but being Māori, unemployed and a sole parent are all correlated with low income.

⁴ Note that there will be additional hidden costs here. Those on low incomes have a greater incentive to buy vehicles that are smaller (and more fuel-efficient) than they would otherwise prefer. Despite, low income households' vehicles are, on average, less fuel efficient than the national average.

⁵ Where an ethnicity is recorded as any ethnicity other than European, that household has at least one person of that ethnicity. For example, a Māori household has at least one Māori person, while a European household consists of only European people.

With regards to employment status, a person who was both a student and employed was recorded as a student. A person receiving a benefit and employed was recorded under 'other benefit' rather than employed. Employed, therefore, refers to employed people who are also not a student or receiving welfare support.

Figure 3: Under- and over-taxation by household type

At least 30 households

Ethnicity					Employment status				
Māori	Pacific Is.	Asian	European		Retired	Student	Unempl.	Other ben.	Employed
+7%	+0%	-5%	+0%	All	-6%	-1%	+3%	+1%	+2%
+5%		-7%	-3%	Person living alone	-6%				-1%
+0%		-2%	-2%	Family with adults only	-8%	-5%			+0%
		-7%	+0%	Other adults only (eg flatmates)	-14%	-4%			+1%
+3%	-3%	-11%	+2%	Married/defacto couple only	-5%				+3%
		+6%	-1%	Single adult living with children	-10%				-1%
+14%	+3%	-3%	+3%	Family (including extended) with children	-10%	+5%	+6%		+3%
			+6%	Family with child(ren) plus flatmates/boarders					+5%

No. of children		Regions			
Zero	-0%	Northland	+6%	+9%	Taranaki
One	-4%	Auckland	-2%	-3%	Wellington
Two	+8%	Waikato	+4%	+3%	Nelson-Marlborough-Tasman
Three	+13%	Manawatū-Whanganui	+9%	+4%	West Coast
Four or more	+10%	Bay of Plenty	+1%	-4%	Canterbury
Sole parents	+5%	Gisborne	+7%	+4%	Otago
Other households with children	+2%	Hawke's Bay	+0%	+1%	Southland

At least 10 households

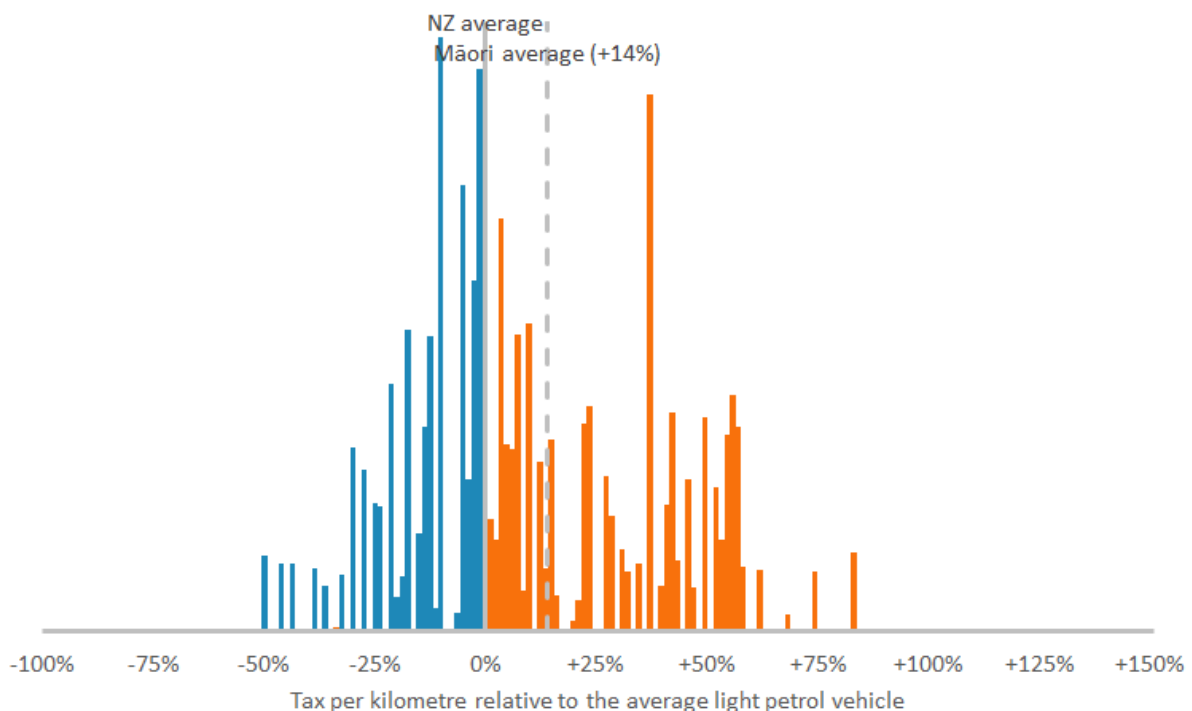
Ethnicity					Employment status				
Māori	Pacific Is.	Asian	European		Retired	Student	Unempl.	Other ben.	Employed
+7%	+0%	-5%	+0%	All	-6%	-1%	+3%	+1%	+2%
+5%		-7%	-3%	Person living alone	-6%	-9%	-5%	-4%	-1%
+0%	-6%	-2%	-2%	Family with adults only	-8%	-5%	+8%	+1%	+0%
-2%		-7%	+0%	Other adults only (eg flatmates)	-14%	-4%	-5%		+1%
+3%	-3%	-11%	+2%	Married/defacto couple only	-5%	-2%	+4%	+3%	+3%
+14%		+6%	-1%	Single adult living with children	-10%	+7%	+6%		-1%
+14%	+3%	-3%	+3%	Family (including extended) with children	-10%	+5%	+6%	-1%	+3%
+6%		-5%	+6%	Family with child(ren) plus flatmates/boarders		-6%			+5%

No. of children		Regions			
Zero	-0%	Northland	+6%	+9%	Taranaki
One	-4%	Auckland	-2%	-3%	Wellington
Two	+8%	Waikato	+4%	+3%	Nelson-Marlborough-Tasman
Three	+13%	Manawatū-Whanganui	+9%	+4%	West Coast
Four or more	+10%	Bay of Plenty	+1%	-4%	Canterbury
Sole parents	+5%	Gisborne	+7%	+4%	Otago
Other households with children	+2%	Hawke's Bay	+0%	+1%	Southland

2.6. THESE INEQUITIES ARE NOT SMALL

81. Ministers have said these differences are small, and the proposed tax increases marginal. The Minister of Transport said the proposed national increase in fuel excise duty amounts to ‘no more than a cup of coffee a week’. This is true of the average household and it’s true that a Maori household would ‘only’, at 14% more, pay 1.14 cups of coffee a week.
82. I disagree that these are small burdens, particularly when we dig a bit deeper.
83. For the average household on an average income with an average fuel-efficiency vehicle, a cup of coffee a week may not be much. But for people on low incomes, on benefits, sole parents with dependents, these increases are not small. These households are not regularly going out for café coffee.
84. That Māori pay 14% more might not seem like a big deal to some, but even this hides burdens on different households. Figure 4 shows the distribution of under- and over-taxation among Māori families.

Figure 4: Under- and over-taxation of Māori households



85. 55% of vehicles owned by Māori households, are overtaxed compared to 39% for New Zealand as a whole.

86. 30% of vehicles owned by Māori households are overtaxed by 25% or more, compared to 16% for New Zealand.
87. 11% of vehicles owned by Māori households are overtaxed by 50% or more, compared to 6% for New Zealand.

2.7. THE OVER-TAXATION ADDS UP TO CONSIDERABLE AMOUNTS

88. Taxing vehicles by the litres they consume rather than the kilometres they've driven creates wide differences in tax paid, with the 10% lowest fuel efficiency vehicles paying **between 110% and 135%** more tax per kilometre than the 10% highest fuel efficiency vehicles.
89. Table 2 shows the difference in the current tax paid between the vehicles with the most and least fuel efficiency assuming they travel the national-average 10,500 kms per annum. The last column, for example, compares the 20% most fuel-efficient vehicles with the 20% least-fuel efficient vehicles.

Table 2: Differences in current tax paid per annum by operators of light petrol vehicles

All types of light petrol vehicle (household, taxis, hire vehicles, goods, other)				
		5%	10%	20%
Highest fuel efficiency		\$305 to \$315	\$330 to \$340	\$355 to \$360
Lowest fuel efficiency		\$765 to \$870	\$720 to \$785	\$670 to \$700
Difference	\$	\$450 to \$565	\$385 to \$455	\$310 to \$345
per vehicle	%	+145% to +185%	+115% to +135%	+85% to +100%
Household light petrol vehicles only				
		5%	10%	20%
Highest fuel efficiency		\$310 to \$315	\$330 to \$340	\$355 to \$365
Lowest fuel efficiency		\$770 to \$870	\$720 to \$780	\$665 to \$700
Difference	\$	\$450 to \$560	\$380 to \$445	\$305 to \$345
per vehicle	%	+140% to +180%	+110% to +135%	+85% to +95%
Difference per household		\$735 to \$915	\$625 to \$730	\$500 to \$560

90. The average household pays \$950 in fuel excise duty per annum (\$580 per vehicle⁶).
91. Owners of low fuel efficiency vehicles subsidise owners of high fuel efficiency vehicles. Households with vehicles among the 10% lowest fuel efficiency pay between \$1,385 and

⁶ New Zealand households own an average of 1.64 vehicles for household use.

\$1,490 tax per annum. Households with vehicles among the 10% highest fuel efficiency only pay between \$645 and \$660 per annum.

92. As earlier, Māori, the unemployed and sole parents are over-represented among households with low fuel efficiency vehicles.
93. For the average household in Kawerau with a household income of \$37,300 per annum, the extra \$500 per year some of them are overtaxed amounts is a lot.

2.8. THE BURDEN ON THE POOR WILL INCREASE WITH HIGHER FUEL TAXES

94. The last National-led Government increased fuel excise duty by 17 cents per litre between July 2009 and July 2015. I estimate this increased annual tax on a 10% most fuel-efficient vehicle by **\$115 and \$120**, compared to **\$235 to \$250** for a 10% least fuel-efficient vehicle (nominal figures).
95. The current Labour-led Government intends to increase nation-wide fuel excise duty by about 10 cents over the first three years of a ten-year period. I estimate that this will increase the annual tax on a 10% most fuel-efficient vehicle by **about \$70**, compared to between **\$140 and \$150** for a 10% least fuel-efficient vehicle.
96. For Auckland, where the intention is to have a regional fuel tax of a further 10 cents a litre, I estimate that this will increase the annual tax on a 10% most fuel-efficient vehicle by between **\$135 and \$140**, compared to between **\$260 and \$275** for a 10% least fuel-efficient vehicle.

Table 3: Increases in tax 2009 to 2018 and beyond

	All light petrol vehicles		
	5%	10%	20%
National-led Government 2009 to 2015			
Highest fuel efficiency	\$110 to \$110	\$115 to \$120	\$125 to \$125
Lowest fuel efficiency	\$250 to \$280	\$235 to \$250	\$220 to \$225
Labour-led Government intentions for 2018 onwards			
<u>Other than Auckland</u>			
Highest fuel efficiency	\$65 to \$70	\$70 to \$70	\$75 to \$75
Lowest fuel efficiency	\$145 to \$165	\$140 to \$150	\$130 to \$135
<u>Auckland (including regional fuel tax)</u>			
Highest fuel efficiency	\$125 to \$130	\$135 to \$140	\$145 to \$145
Lowest fuel efficiency	\$275 to \$305	\$260 to \$275	\$245 to \$250

97. In Auckland, the average household will pay about \$320 more in nation-wide and regional fuel taxes per annum than it does today (from \$930 to \$1,250).
98. For a household with vehicles that are among the least 10% fuel efficient, the additional tax will be between \$440 and \$470 per annum, with disproportionately more of these households being Māori, unemployed, and sole parents. (The regional fuel tax specific share of this is about half - \$225.)

2.9. BUT WON'T THE EXPENDITURE FROM AUCKLAND'S REGIONAL FUEL TAX BENEFIT THE POOR?

99. Perhaps, but the question is not whether the poor are made better off, but what is the best way to fund the desired projects.
100. The regulatory impact statement contains little analysis of the magnitude of impacts, particularly around distributional impacts, to be confident that regional fuel taxes are better for the poor than rates.
101. Investment in public transport has two primary benefits: (1) short-to-medium-term congestion benefits, and (2) social welfare benefits when subsidised and provided to areas of deprivation. It's possible that the proposed investment under GPS 2018 will have greater benefits to the poor, but not always and not forever.
102. With regards to (1), low-income people work night shifts more than high-income people meaning the potential congestion benefit to low-income people is likely less than to high-income people.
103. With regards to (2), I understand much of the public transport services will reach deprived areas of Auckland, but:
- taxing poor people more to provide services to poor people is not ideal. If we want user pays, should be charged per kilometre through road user charges, rather than per kilometre through petrol taxes
 - there is no guarantee that future expenditure will not be directed to other, wealthier, parts of society under this Government or future ones.

2.10. OTHER SOURCES OF REVENUE AVAILABLE NOW

104. The Auckland Council could have increased rates or debt. The Government could have increased debt. Both could then have repaid those debts as congestion and road pricing were implemented. Both the Council and the Government have made public commitments not to take on more debt and only weak signals about progressing other revenue sources, preferring regional fuel taxes instead.
105. If the Council and Government continue with that, I need to be clear that that is a conscious decision to do so at the expense of poor people.

2.11. RECOMMENDATIONS

106. Fuel taxes are inequitable and grossly regressive. They should be replaced at the earliest possible opportunity with congestion pricing and road pricing – approaches to transport funding that are as close to an ‘everyone wins’ policy as it gets.
107. If congestion and road pricing are more than a few years away, we need to think about moving from fuel taxes to road user charges and/or compensating poor households.
108. The up to 10-year period, renewable, for regional fuel taxes risks embedding or becoming a crutch for officials. It risks slowing progress on other revenue sources. Four years is long enough to complete policy work and make legislative change.
109. I recommend that, if the Council is of a mind to recommend regional fuel taxes to Parliament, that:
- in order to reduce the risk of further embedding regressive taxes, apply for a regional fuel tax for 4 years, not 10, renewable only if there is good reason not to implement congestion and road pricing
 - ask the Government to explore transitioning from petrol excise duty to road user charges
 - ask the Ministry of Transport and Ministry of Social Development to provide advice on what additional income support could be provided to disadvantaged people most adversely affected by regional fuel taxes.

3. ONE REASON WHY GOVERNMENTS, COUNCILS AND THEIR AGENCIES LOVE FUEL TAX

110. The Ministry of Transport has copied and pasted (very bad and often unintelligible) analysis from a different project⁷ completed in 2015 into its regulatory impact statement.
111. Perhaps inadvertently, the Ministry cites the following in a paragraph about the supposed relative advantages of regional fuel tax (page 16):

Payment of fuel taxes requires no action on the part of end users, who may not even be aware of how much they are paying. Small increases can go unnoticed by many users and generate little negative response. Transport fuel taxes have significant scope to be increased. Fuel demand is generally acknowledged to be highly inelastic historically, that is, demand is not very responsive to price. However, this may be changing according to both international and national indicators, especially since the price of petrol in New Zealand increased to above two dollars per litre.

112. It's possible that the Ministry may say that this is a matter of fact and not an advantage of fuel tax, per se. However, the same text appeared in the work from 2015⁸ explicitly as an advantage of fuel tax:

Advantages

- ▶ It has significant revenue yield, coupled with very low administrative and compliance costs. A small increase in the fuel tax generates substantial revenue.
 - ▶ As payment of fuel taxes is automatic with purchase it requires no action on the part of end users, who may not even be aware of how much they are paying. Small increases can go unnoticed by many users and generate little negative response.
113. The only people who benefit from not knowing how much tax they're paying and whether expenditure plans warrant those levels of taxes are people who don't care and Governments and their agencies that would rather that those people who do care, don't notice.
114. This is a remarkable, striking admission and not in keeping with requirements for government to be open and transparent.
115. Some people will wonder whether this thinking has made its way to Council.

⁷ <https://www.transport.govt.nz/assets/Uploads/Our-Work/Documents/ff-revenue-tools-for-transport.pdf>

⁸ Ibid, page 8.

4. THE MULTIPLE ERRORS IN THE MINISTRY OF TRANSPORT'S ASSESSMENT OF OPTIONS

4.1. SUMMARY

116. The Ministry has made multiple, simple yet often important, errors. Most of this relates to the text in pages 14 to 20 and the table in pages 21 to 26 of the regulatory impact statement.

- Some of the errors illustrate that the Ministry has not got a good understanding of transport revenue policy and economics.
- Some of the errors illustrate that the Ministry has not got a good understanding of how to structure and analyse policy more broadly.
- **The Council and Select Committee should** note that if regional fuel taxes do not pass into law, the status quo is not that ATAP and other transport projects do not go ahead, but that Councils will use rate increases, debt and, perhaps, defer some projects (including non-transport projects) instead.
- **The Council and Select Committee should** note that correcting in Ministry's errors would lead to tolling (and other congestion and road pricing options) being more positively assessed and regional fuel taxes (and fuel taxes in general) being more negatively assessed.

4.2. WHAT IS THE STATUS QUO?

117. There is no clear definition of what the counterfactual is. One of the options – the supposed counterfactual – is 'no action'. I don't think any reader will know what that option means.

118. The stated reason for regional fuel taxes is to progress projects faster than they would otherwise. If the status quo of 'no action' is that no other funding source would be increased, then the RIS would need to analyse the impact of other funding source options (such as increasing rates) on the speed of project delivery and the impact on net benefits to transport users. If increasing rates, for example, is less feasible, politically or otherwise, the rates option would be assessed as delivering benefits more slowly than a regional fuel tax.

119. This analysis has not happened.

120. A clearer status quo would be to assume that there are a set of projects to be undertaken that, in Auckland, looks something like ATAP (or a revised version) particularly as ATAP is **part** of the status quo along with its associated funding gap, and then talk about the best ways to raise revenue.

121. An increase in local authority rates would probably be the status quo, or a mix of that and debt. At the moment, an increase in rates scores mostly negatively against the counterfactual, when most people's idea of the counterfactual/status quo is rates increases. Even RNZ's Mediawatch got this right in its piece about media coverage of the regional fuel tax proposal.⁹
122. An important question the Committee needs to ask itself is what happens if Parliament decides not to pass a Bill allowing regional fuel taxes. The answer is not that ATAP and other projects do not go ahead, but that they would be funded by rates increases and debt and, perhaps, on a longer timeline.
123. The Ministry's analysis borders on misleading the Committee in this regard.

4.3. THIS CAUSES RATES INCREASES TO APPEAR WORSE THAN THEY ARE

124. Overall, the Ministry assesses rate increases negatively against the Ministry's ill-defined status quo. This serves to accentuate the difference between rate increases and a regional fuel tax, but it's effectively double-counting.

4.4. SPEED OF IMPLEMENTATION

125. While there is no analysis of options' impact on the delivery of transport projects, there is a 'speed of implementation' criterion. This is more about how quickly a source of revenue can be established, rather than whether that would have an impact on the delivery of projects. However, even here the analysis is wrong.
126. The 'no option' scores better than local authority rates because 'there will be no implementation required as the status quo will remain in place', rather than much worse than rates because not closing the funding gap will see the slowest delivery of projects of all the options.

4.5. ENVIRONMENTAL SUSTAINABILITY

127. Increasing fuel taxes will have co-benefits of reducing emissions, but there is already provision for this in the Emissions Trading Scheme tax on fuel.

⁹ In the audio version of this: <https://www.radionz.co.nz/national/programmes/mediawatch/audio/2018639331/transport-plan-sparks-front-page-road-rage>. Note: I was moderately in favour of regional fuel taxes at the time I wrote the piece referred to in Mediawatch. Further analysis has shifted my view to neutral.

128. If the Government is concerned about climate change, as it should be, it should increase the carbon price / cost of ETS units.
129. By most economic assessments, the ETS charge should be ten times its current approximate 3¢ per litre level, and rising quickly from there in the near future.
130. When it does eventually do this, the environmental sustainability justification for regional fuel taxes will be nil.

4.6. THE CRITERION OF 'ECONOMIC EFFICIENCY' IS ABSENT

131. The Ministry of Transport includes a 'compliance and administration cost' criterion, but these costs are just one part of whether something is economically efficient.
132. The absence of an overall 'economic efficiency' criterion is astonishing.
133. Taxes increase the costs of goods and services to which they apply, reducing the amount that consumers are willing and able to buy. Taxes change the relative prices of goods and services, distorting purchasing decisions – encouraging people to buy things with lower tax.
134. In general, taxes create a deadweight loss – a reduction in benefit to consumers and producers over and above the revenue generated.
135. The situation is a bit different if a Government is cost-recovering, through a user charge, a product it provides. Only congestion and road pricing are true user charges. The only option the Ministry considered that matches this description is tolling.
136. Fuel taxes under- and over-charge people. They therefore generate deadweight loss. The deadweight loss per vehicle is small, but there are millions of vehicles in New Zealand.
137. The deadweight loss is bigger on non-road uses of transport such as fuel used on farms, in lawnmowers, in boats, etc.
138. To put this in perspective, let's consider current fuel taxes versus (paid by petrol vehicles) road user charges (paid by diesel vehicles). It's often argued that fuel taxes are much more efficient than road user charges. This is because fuel taxes have low administration and compliance costs (they are incurred as you fill up your car) whereas people have to, at a minimum, go online to purchase road user charges. The deadweight loss from fuel taxes makes road user charges almost as efficient a revenue source as fuel taxes.

139. If deadweight loss had been counted, this would count negatively against all options to different degrees except tolling for which there is, essentially, no deadweight loss.

4.7. WHY AREN'T WE FIXING TOLL ROAD POLICY AT THE SAME TIME?

140. The Ministry of Transport lists road tolls as an option in the regulatory impact statement.

141. The Ministry doesn't say anything significantly wrong in its analysis on page 15. Current road tolling policy is a mess, particularly because of the prohibition on tolling existing roads.

142. But if the Land Transport Management Act is being amended to allow regional fuel taxes, why not remove the prohibition on tolling existing roads at the same time?

143. Tolling is more equitable than regional fuel taxes and, for some roads, more economically efficient. Tolls could be used to limit the need for regional fuel taxes.

144. It's too late now for the Committee to recommend this change as part of this Bill, but this Bill has been a wasted opportunity in this regard.

4.8. TOLLS ARE SCORED TOO LOWLY AGAINST THE GOVERNMENT'S OBJECTIVES

145. Tolls are assessed as being equally fair as regional fuel tax. Tolls charge for people's actual use of roads. Fuel taxes charge by fuel use, and are grossly inequitable to poor regions and the poor within regions (see section 2).

146. Tolls should have been assessed as **much better** than the status quo (++), not **better** than the status quo (+).

147. The overall effect of the mis-assessment of tolls is to underplay the benefits of more precise and equitable revenue collection. Tolls are also one way of delivering congestion and road pricing. Because of short-term implementation challenges, road pricing is not an immediate solution, but it is a medium-term one. The Ministry's analysis wrongly undercuts that.

4.9. INCREASING RUC AND FED NATIONALLY

148. The RIS sets out the problem as being about closing regional funding gaps for projects / finding better ways to fund the local/regional share of projects.

149. The overall assessment of increasing RUC and FED **nationally** is assessed as being a better option than increasing rates. This leads to the inevitable, but unstated by the Ministry

(perhaps they didn't realise), conclusion that local authority contributions to projects should be eliminated, rates reduced with all transport funding coming from RUC and FED.

150. Where, then, is the recommendation to amend the Act to abolish joint-funding with councils? Perhaps there is good reason to have joint-funding – say, to encourage councils to put forward only projects they think are worth putting funding towards themselves. If so, and those reasons are good enough to have joint-funding, the mis-assessment that increasing RUC and FED nationally is better than rates is wrong and shows how poorly the Ministry has assessed the options.

4.10. FINANCING

151. Financing as an option is absent.
152. The investment required for Auckland is lumpy, and front-loaded in the first five years or so, yet there is no option to finance the projects through debt or PPPs and repay over time.
153. The ring-fencing of transport taxes meant less competition for funding with other Votes and less scrutiny by Treasury.
154. To protect against overly political decision-making, transport is mostly pay-as-you-go. Infrastructure that might last decades is paid for as it's built. Pay-as-you-go encourages politicians to do the calculus of the political cost and not pass unnecessary debt onto future generations/governments. But it also front-loads all costs onto current users.
155. The current Government has a lot in common with the previous Government when it comes to ATAP. There are differences around some projects, but a revised ATAP in 2018 will look, in large part, the same as the one agreed in August 2017.
156. If there's broad political consensus on many of these train, bus and road projects, why not finance them with debt (or other sources), and spread the costs over time?
157. The answer is political commitments not to. The preference of Councils and Government is, instead, to pursue fuel taxes at the expense of poor people.
158. But this does not answer why the Ministry did not include this option. The Ministry is required to include all feasible options. It has omitted financing for reasons that are unclear.

(Chapters 5 to 7 are reproduced from my Select Committee submission and are, perhaps, less relevant to Council deliberations with responsibility more falling to central government.)

5. PRICE-SPREADING

5.1. SUMMARY

159. Price-spreading is mainly discussed on pages 36 and 37 of the regulatory impact statement.

- The Ministry has over-stated the evidence of historical price-spreading.
- Price-spreading is a real possibility, however, and depends on the extent of competition in regional fuel markets.
- If the Commerce Act amendments currently before Parliament pass, the Commerce Commission will have greater power to investigate potential competition issues through a Market Studies Power. **The Committee could** recommend that the Minister of Commerce ask the Commerce Commission to use its new power to investigate the fuel market.
- The Ministry has little in the way of a plan for monitoring price-spreading and responding accordingly. Such monitoring will be necessary before the Commerce Commission can complete its investigation, or if an investigation into the fuel market is not a priority for the Commission. **The Committee could** ask the Ministry to prepare and implement a proper monitoring regime, and to regularly report to the Committee on how regional fuel markets respond to regional fuel taxes.

5.2. WHAT IS PRICE-SPREADING?

160. In its regulatory impact statement, the Ministry of Transport describes the risk of price-spreading as 'a significant concern'. Price-spreading involves fuel retailers increasing petrol prices by less than the 10 cents in Auckland and recouping the remaining tax from other regions. The most extreme example of price spreading would see every region's tax go up 3 cents.

5.3. DID PRICE-SPREADING EVER EXIST?

161. The Ministry says that 'price spreading occurred in the early 1990s when a regional petrol tax was in place in the main urban regions'. The Ministry has always claimed price-spreading was evident in the 1990s but, as far as I am aware, no one has ever provided compelling, or even reasonable, evidence of this.

162. A BERL report in 2012¹⁰ referred to the ‘perceived response to the 1992 regional fuel tax’ and ‘allegations of tax spreading to other regions’. I’ve heard that these perceptions came from freight companies. You’d want better evidence than my faint memories of someone else’s anecdote before saying that price-spreading occurred.

5.4. PRICE-SPREADING CAN ONLY EXIST IF THE MARKET IS NOT COMPETITIVE

163. The Ministry says that ‘fuel is bought and sold in a competitive national market’, seemingly suggesting that competition isn’t a concern.

164. However, the Ministry also says ‘the extent to which prices would increase in one area will also depend on the extent of competition in that area or region’. The ‘also’ in this sentence is wrong. Price-spreading entirely depends on a lack of competition. Competition pushes prices down. Prices can only be held up if a company has price-setting abilities without fear of prices being undercut by a competitor.

165. If regional markets are competitive, price-spreading will not be an issue. If regional markets are not competitive, price-spreading might be an issue.

5.5. ARE RETAIL FUEL MARKETS COMPETITIVE?

166. The previous National-led Government commissioned a report by NZIER¹¹ into competition in fuel markets. That report suggested a lack of competition in some areas. NZIER said: ‘we cannot definitively say that fuel prices in New Zealand are reasonable, but we have reason to believe that they might not be’ and that ‘retail gross margins in Wellington and the South Island have increased at a faster rate than margins in the [rest of the] North Island’.

5.6. WHAT CAN BE DONE ABOUT A POSSIBLE LACK OF COMPETITION?

167. The NZIER report made a number of recommendations. The Ministry of Transport’s regulatory impact statement mentions one of them – the Commerce Commission having the power to initiate investigations which is before Parliament through a Market Studies power in amendments to the Commerce Act – but is silent on pursuing other recommendations from the NZIER’s report.

¹⁰<http://temp.aucklandcouncil.govt.nz/SiteCollectionDocuments/aboutcouncil/committees/transportcommittee/meetings/transportcomagitem1to1020120801.pdf>, p. 25-26

¹¹<http://www.mbie.govt.nz/publications-research/publications/energy/new-zealand-fuel-market-financial-performance-study-final%20Report.pdf>

168. Instead a couple of other options are listed as being possible:
- Publication of the kind of data that might help indicate price spreading
 - ‘Developing a proactive communication strategy designed to enlist industry support’.
169. I’m not sure what the second one means (which industries?), what it involves and why it would be effective, but the Ministry makes no undertakings to do either of these things. The Ministry also does not include the cost of these things in its ‘summary table of costs and benefits of the preferred approach’.
170. The Ministry does not have a detailed plan for monitoring the fuel market. It should. And it should have had this for at least the past 25 years if, as it states in the regulatory impact statement, it has had concerns about competition for at least 25 years (since the early 90s).
171. It is not sufficient to simply publish data. Data must be processed, analysed, and reports and calculations reviewed.
172. How will the Ministry know if price-spreading has possibly occurred? The Ministry doesn’t say.
173. How will the Ministry respond to possible price-spreading through non-regulatory interventions it or other agencies can make? The Ministry doesn’t say.
174. How will the Ministry know whether to recommend to Ministers that a fuller investigation be initiated? The Ministry doesn’t say.

5.7. THE LACK OF MONITORING

175. Too often agencies say they’ll monitor how regulation performs, but without a plan, and then fail to do so. When regulatory change are next considered, the lack of monitoring means there’s little evidence to inform amendments.
176. Here’s the entirety of the Ministry of Transport’s plan for monitoring the effectiveness of road safety regulation changes in 2010¹²:

The effectiveness of these initiatives will be monitored as part of reviewing the Safer Journeys action plans. This function will be carried out by the

¹² <https://www.transport.govt.nz/assets/Uploads/About/Documents/Safer-Journeys-increasing-the-safety-of-young-drivers.pdf> , p. 43.

National Road Safety Committee, who will provide regular progress reports to the Minister of Transport.

177. By 2015 it was clear, though the Ministry wouldn't say so, that the road toll had started increasing since 2013. Even now in 2018 and the Ministry is unable to say why or credibly say what should be done about the increasing rate of road deaths.

178. This can be traced back to ineffectual monitoring – from plans, to resources.

5.8. RECOMMENDATIONS

179. The Committee should ask the Ministry of Transport to:

- develop a detailed plan for monitoring indications of price-spreading and for what actions might be triggered if price-spreading is detected
- report back on this plan by 30 September 2018, being three months after the first regional fuel tax is scheduled to be implemented
- regularly report publicly, to Ministers and the Committee on the results of ongoing monitoring.

6. TAX EVASION AND BLACK MARKETS

6.1. SUMMARY

180. The risk of tax evasion is discussed on page 37 of the regulatory impact statement. In some media¹³, this has been interpreted as black markets forming.

- The Ministry of Transport says that fuel tax evasion could come in the form of 30,000 litre road tankers.
- There is a risk of tax evasion by fuel companies, but the proposed fine may be too low to deter it.
- There is no risk of black markets forming. The cost of establishing a black market outweighs the revenue by considerable margins.
- **The Committee could** consider whether the fine for tax evasion is high enough and seek more advice from the Ministry.
- **The Committee should** disregard any concern about black markets forming.

6.2. WHAT DOES THE MINISTRY OF TRANSPORT SAY ABOUT TAX EVASION AND BLACK MARKETS?

181. The Ministry makes a valid point on page 38 of the regulatory impact statement about drivers, particularly large transport operators, filling up at points on their trip that have lower fuel prices and that this might be in regions that neighbour those with regional fuel taxes.

182. But the Ministry goes further. On page 37, the Ministry says:

Individuals and businesses may use the regional fuel tax for financial gain by purchasing fuel outside the regional fuel tax area and re-selling it within the regional fuel tax area. The scale of this could be anything from small containers to entire 30,000 litre road tankers.

183. The Ministry's wording is vague.

184. The Ministry might mean that fuel companies would send trucks from distribution centres in Northland and Tauranga, where the tax doesn't apply, to parts of Auckland rather than from the distribution centre in Auckland.

¹³ <https://www.interest.co.nz/news/92873/its-regulatory-impact-statement-ministry-warns-burden-auckland-fuel-tax-could-actually>

185. Another interpretation is black marketeers being involved in the purchasing and on-selling of fuel through their own means. Former Ministry staff have said it was a concern internally and it has been raised by industry participants in the past.¹⁴

186. I consider each of these interpretations below.

6.3. TAX EVASION

187. Financial incentives do exist to evade regional fuel taxes. Fuel companies could send trucks from Northport to service stations in Auckland where it is more cost-effective to do that than transport fuel from Auckland's distribution centre.

188. The Bill provides for fines of up to \$75,000. The regulatory impact statement does not say why the Ministry thinks this is an appropriate level.

189. With a regional fuel tax of 10c, a 30,000 litre truck would gain additional revenue of \$3,000 per round trip. This means that a company could raise the value the maximum fine through only 25 trips (about 15,000 car fill-ups). In 2016, there were over a million light passenger vehicles in Auckland filling their tanks around once every three weeks.

190. I'm not an auditor, but it feels like it would be much easier to detect unpaid PAYE and GST (for which the fine is not much lower at \$50,000) than to detect fuel being redirected within a business's production chain.

191. The Committee could consider whether the fine is high enough and perhaps ask for more advice from the Ministry.

6.4. BLACK MARKETEERS

192. Perhaps the easiest way to understand why a black market won't arise is to realise that for similar savings of 6c to 20c a litre, there is no thriving second-hand market for supermarket fuel vouchers. The costs to people of searching out a black marketeer and the costs to a black marketeer of physically transporting and selling fuel are, instinctively, much higher than for a trade in fuel vouchers.

193. The more detailed analysis that follows confirms that a black market is impossible.

¹⁴ <http://www.stuff.co.nz/dominion-post/news/4822339/Call-for-regional-fuel-tax-slammed>

Individual black marketeers

194. For the sake of argument, let's assume black marketeers and their customers evenly split the 10c saving. It is very difficult to imagine individuals travelling from a regional fuel tax region with small containers to resell to others for 5c of revenue per litre. It is even more difficult to imagine potential customers seeking out these black marketeers to buy from for a \$2.50 saving per 50 litre car tank of petrol. Even if that was likely, how many litres can an individual black marketeer transport? Barely enough to fill one car for \$2.50 of revenue.
195. There's a time cost in participating in a black market that doesn't exist when filling up your vehicle at a different service station during a long journey, or from filling up your car at a service station then doing a runner.

30,000 litre tankers

196. But perhaps there are economies of scale to black marketeers if they could somehow get their hands on a 30,000 litre truck.
197. This is what a 30,000 litre road tanker looks like:



198. My simple calculation below, which leaves many costs unquantified, shows that the costs of transporting and selling fuel into Auckland from outside Auckland would be much more than the revenue generated. That is, any black market could only hope to make significant losses.

The calculation

199. The maximum revenue a 30,000 L truck can earn from a 10c difference between Auckland and neighbouring regions is \$3,000 per round trip.

200. The most “plausible” black market would be a fuel company loaning a truck tanker to a side business in the black market, rather than a cowboy buying or renting their own truck. This keeps truck capital or hire costs close to zero.
201. A fuel company couldn’t loan its land storage, though. Due to auditors and the big risk of detection by members of the public or authorities, the retail end of a black market couldn’t operate from a fuel companies’ petrol station or other premise. A black marketeer would, therefore, still have to purchase or hire their own 30,000 litre land storage tank and find a place to park the truck tanker for two weeks. If a black marketeer can’t find a fuel company to loan a truck tanker, they’d have to purchase and hire that too.
202. Not being able to use a fuel company’s self service station, the black marketeer will have to be there in person, pumping fuel and transacting with consumers. At 50 litres per fuel tank in a car, 30,000 litres is 600 cars. At 10 minutes each to fill and pay, that’s 100 hours of time.
203. One hundred hours of time is about two weeks. A 30,000 litre truck could, therefore, make a round trip every two weeks.
204. Right here the logistics are substantial, and make the idea of a black market hard to fathom.
205. Fuel is stored near ports, so trips would be between either Northport and Auckland or Tauranga port and Auckland. Here’s how the revenue and cost of those two options stack-up:

Table 4: Revenue and costs of a black market involving 30,000 litre trucks

	Northport – Auckland	Tauranga – Auckland
<u>Revenue and costs per round trip (two weeks)</u>		
Revenue	\$3,000.00	\$3,000.00
Costs	\$4,302.24	\$4,936.54
Trip to Auckland	\$645.24	\$962.39
Land storage	\$135.76	\$135.76
Sale time	\$2,876.00	\$2,876.00
Return trip	\$645.24	\$962.39
Profit or loss	-\$1,302.24	-\$1,936.54
<u>Assumptions per round trip</u>		
Distance (km)	281	436
Driving time (hours)	3.9	5.8
Toll road charge	\$9.40	\$10.00
RUC per 1,000 km	\$559.00	\$559.00
Wage rate per hour	\$28.76	\$28.76

Other operating costs per km	\$3.62	\$3.62
Land storage	\$135.76	\$135.76
Selling time (hours)	100	100

Sources

Distance (km)	Google maps
Driving time (hours)	
Toll road charge	NZ Transport Agency
RUC per 1,000 km	NZ Transport Agency . No. 6 plus no. 33.
Wage rate	Statistics NZ . Machine operators and drivers.

Other operating costs per km

The Ministry of Transport says that “on average RUC makes up about 10 percent of total road freight costs, so even quite large increases in RUC will represent a relatively small change in total truck operating costs”.

\$559 worth of RUC implies \$5,590 of total operating costs. Subtracting RUC and wage costs, and we have about \$4.62 per km in other operating costs.

This *might* be an overestimate. I can’t find New Zealand estimates for fuel trucks, but a US estimate says the per km operating costs are about \$3.00. Longer hauls in the US will spread fixed costs, so \$3.00 is likely too low for New Zealand. Between \$3 and \$5, depending on the size of the truck, accords with some information provided to me by a freight company.

I settled on an assumption of \$4 per kilometre minus the wage costs already calculated, leaving \$3.62 in other operating costs.

Land storage

A 30,000 land tank costs about \$27,000. At a business interest rate of 10% per annum and a useful life time of 14.3 years, the monthly repayment is \$295.15. This assumes that either the regional fuel tax lasts 14.3 years, rather than just 10, or that a black marketeer could sell the tank second hand at the end of 10 years. If not, and the tank needs to be paid off by the end of 10 years, the monthly repayment is \$355.22 (or about \$163.39 per trip).

Selling time (hours)	Calculated. 30,000L at 50L cars is 600 cars. At 10 minutes per car, this is 100 hours.
----------------------	--

206. Uncounted here are the following:

- The cost to consumers of seeking out the black marketeer.
- Any paint job and new number plates required to make a truck tanker less conspicuous, and less likely to be traced back visually to the company that provided it.
- The cost of land under a tank and parking for customers and the truck.
- The risk of bandits from this apparently high-value fuel.

Figure 5: Not a Ministry of Transport illustration of bandits and black marketeers



6.5. RECOMMENDATIONS

207. The Committee:

- could consider whether the fine for tax evasion is high enough and seek more advice from the Ministry of Transport
- should disregard any concern about black markets forming.

7. HOW IN LOVE WITH CARS ARE NEW ZEALANDERS REALLY?

208. Half a dozen times, the regulatory impact statement says “fuel use and vehicle use is relatively inelastic” including in its table on pages 21 to 26. The Ministry uses this to say that raising fuel taxes will collect a lot of revenue without changing behaviour much.
209. It is true that how much fuel people buy doesn't change much when prices/taxes go up. A 10% increase in price is estimated to cause a 3% reduction in fuel purchases in the long term (anything less than 10% is called ‘inelastic’ in economics).
210. However, this is because fuel makes up only a small part of the cost of running a vehicle (average 17¢ per kilometre). Other costs include maintenance, insurance, time, etc (56¢ excluding time, \$1.02 including time).
211. If we used this logic, we'd say peoples' use of trains is inelastic with respect to the cost of reupholstering passenger seats – true, but completely meaningless for setting transport policy.
212. Worse than meaningless. The notion that driving is inelastic has mis-directed transport policy.
213. An elasticity of 0.3 on fuel purchases implies an elasticity of driving of between about 1.2 and 2.0. Driving is, in economic terms, elastic, not inelastic. That is, a 10% increase in price causes between a 12% and 20% change in driving.
214. A 5% increase in petrol prices from a 10¢ per litre increase is equivalent to between a 0.8% and 1.2% increase in the overall costs of driving, depending on whether time costs are included, but causes a 1.6% reduction in driving.
215. Revenue might be fairly constant because the tax is on fuel, but driving is elastic, not inelastic.
216. Unfortunately, the idea that driving is inelastic – that people love driving and will never change – has dominated transport planning and policy for decades.

Final remarks

217. The decision to introduce regional fuel taxes should not be taken lightly. At best, they are marginally better than other existing revenue sources. There's a good chance they are much worse than existing sources, and will push some households into poverty.
218. Others will view them as a politically-convenient way of allowing local-body politicians to keep promises of small rate increases.
219. Regional fuel taxes, and fuel taxes in general, are inequitable and grossly regressive. It is difficult to justify implementing more of them, let alone continuing with the fuel taxes we already have.
220. I am neutral on regional fuel taxes in the short-term only because it will take a few years to implement other revenue sources. I am strongly against regional fuel taxes continuing for any more than a few years. Fuel taxes should be replaced by congestion and road pricing as quickly as possible.
221. Thank you for your consideration of my submission. I am happy to provide further analysis if requested.

SUBMISSION ON THE DRAFT AUCKLAND REGIONAL LAND TRANSPORT PLAN 2018-2028 AND PROPOSAL FOR A REGIONAL FUEL TAX

To: AK Have Your Say
Auckland Council
Freepost Authority 182382
Private Bag 92300
Auckland 1142
Email: akhaveyoursay@aucklandcouncil.govt.nz
and rltp@at.govt.nz

Name of Submitter: Stride Property Limited

Address: PO Box 6320
Wellesley Street
AUCKLAND 1141
Attention: Mark Luker
Email: Mark.Luker@strideproperty.co.nz

Submission on the Draft Auckland Regional Land Transport Plan 2018-2028 and Proposal for a Regional Fuel Tax

Introduction

1. This is feedback on the Draft Auckland Regional Land Transport Plan 2018-2028 (**Draft RLTP**) and the Proposal for a Regional Fuel Tax (**Proposed Fuel Tax**) by Stride Property Limited (**Stride**). The Draft RLTP and the Proposed Fuel Tax were opened for public feedback on 30 April 2018 by Auckland Council (**Council**).
2. Stride appreciates the opportunity to provide feedback on the Draft RLTP and Proposed Fuel Tax.
3. Stride is part of the Stride Property Group (**SPG**). SPG is an NZX listed stapled group comprising Stride and Stride Investment Management Limited. Stride manages one of New Zealand's largest diversified investment property portfolios with a range of commercial office, retail and industrial properties. Stride manages 69 properties across New Zealand worth over \$2.2 billion.
4. Stride's property portfolio includes 21 properties in Auckland. The majority of Stride's investment properties are located in the Metropolitan Centre, Town Centre, Local Centre and Light Industry zones of the Auckland Unitary Plan (Operative in Part).
5. Stride's investment in centre locations supports the desire to create developments that have high accessibility, amenity and functionality. Centres form an important part of the commercial infrastructure of a society, and are critically important to the economic prosperity and vitality of the city. Centres are also key nodes in our existing transport network.

6. As Auckland's population continues to increase, and the form of the city intensifies, it is critical that the investment in infrastructure, and in particular transport infrastructure, supports a quality compact urban form. Providing for transport infrastructure that supports alternative modes and enables residential intensification in proximity to the centre and transit network will provide for growth in the right locations and optimise infrastructure investment.
7. The investment and prioritisation of transport infrastructure to support residential growth in proximity to our major centres is also consistent with the strategic direction in the Draft Government Policy Statement on Land Transport (**Draft GPSLT**) which provides for access as a key strategic priority, and three access objectives for:¹
 - (a) A land transport system that provides increased access for economic and social opportunities. To achieve better connected and accessible metropolitan and high growth urban areas.
 - (b) A land transport system that enables transport choice and access. To achieve increased mode shift to walking, cycling and public transport.
 - (c) A land transport system that is resilient. To achieve improved network resilience for the most critical connections.
8. Two of Stride's flagship Auckland properties are located in the Westgate Metropolitan Centre and the Silverdale Town Centre which are key nodes for the planned residential growth in west and north Auckland.

Westgate Metropolitan Centre

9. Stride is the owner of freehold and leasehold land in sub-precinct A of the Westgate Precinct, which is zoned Metropolitan Centre. Stride has developed and operates the NorthWest shopping centre on the parcel of land bounded by Maki Street, Rua Road and Gunton Drive. Stride also owns and operates NorthWest 2, the retail and commercial development on the opposite side of Maki Street which frames the town square. (NorthWest shopping centre and NorthWest 2 are collectively referred to as **NorthWest**).
10. The Westgate Precinct, once fully developed will provide a major retail centre, office, mixed use, high density residential, light industrial activities and public parks and spaces. The Westgate Precinct is projected to be home to 4,000 new residents and provide over 8,000 new jobs.
11. The development of the Westgate Precinct is also supported by the development at Hobsonville, the live residential zoning of the Redhills Precinct, and progress to live zone Whenuapai with the structure plan process complete and Plan Change 5 decision due by mid this year.
12. The Draft Auckland Plan has identified the Westgate Metropolitan Centre as one of three major hubs (outside the City Centre) which will provide for a broad range of business and employment activity, civic services and residential use, critical to the growth across the region.²

¹ Draft Government Policy Statement on Land Transport (14 March 2018), pages 7, 12-17.

² Draft Auckland Plan, p 179-181.

13. The north west growth areas (Red Hills, Whenuapai, Kumeu, Huapai and Riverhead) are expected to supply 40,000 additional dwellings over the next 30 years, and employment areas with over 13,000 new jobs. A significant amount of this growth is contracted or planned to occur within the first decade (before 2022), or the first half of the second decade (before 2032).³
14. It is critical that the funding and priorities in the Draft RLTP facilitate and support the commercial and residential development within and in proximity to Westgate.

Silverdale Town Centre

15. Stride also owns and manages the Silverdale Centre at 61 Silverdale Street. The Silverdale Centre is located in the Silverdale Town Centre zone and fronts Silverdale Street and Central Boulevard. Silverdale Centre includes over 35 specially-selected shops, The Warehouse, Countdown supermarket, and food outlets.
16. The Silverdale, Wainui East, and Dairy Flat areas contain approximately 3,575 hectares of Future Urban and live zoned greenfield land with the capacity for approximately 33,000 dwellings. The areas that are expected to be development ready by 2022 is anticipated to provide for 5,000 dwellings and 617 ha of business land. The new business land will create approximately 13,000 local jobs for the area.⁴
17. The residential and business land in proximity to the existing investment at the Silverdale Town Centre should be supported by prioritising investment in transport networks and modes between the employment, town centre and residential areas.

Scope of submission and relief sought

18. The Council's vision for Auckland, as outlined in the Draft RLTP, is to deliver an accessible, well-connected, safe and sustainable region.⁵ The Proposed Fuel Tax of 10 cents per litre (plus GST) added to sales of petrol and diesel within Auckland (starting on 1 July 2018 for a period of 10 years) is to assist the funding for that vision.
19. Stride supports the vision in the Draft RLTP and need for the Proposed Fuel Tax to provide additional funding.

Directions and focus areas

20. Stride supports the directions and focus areas of the Draft RLTP, and in particular the direction to "create an integrated transport system connecting people, places and goods and services", and the focus area to "make better use of existing transport networks, including a greater focus on influencing travel demand."
21. However, it is considered that the focus area to "Better integrate land use and transport decisions"⁶ is not as strong as the Auckland Plan 2012 priority to "Integrate transport planning and investment with land use development".⁷ Integrating land use and transport decisions is critical.

³ Infrastructure Provision Study for Future Urban Areas (2017-2027) Draft for Discussion, page 36.

⁴ Infrastructure Provision Study for Future Urban Areas (2017-2027) Draft for Discussion, page 26-35.

⁵ Draft Auckland Regional Land Transport Plan 2018-2028, page 3.

⁶ Ibid page 8.

⁷ Auckland Plan 2012, Chapter 13, page 312.

22. It is recommended that Focus Area 5 be amended by removing the qualifier “Better”, so it reads “Integrate land use and transport decisions”.
23. Focus Area 2 provides “Target new transport investment to the most significant challenges”. It is considered that new transport investment should not be targeted to “the most significant challenges”, as this may not align with the desired urban form or provide the best return for the infrastructure investment.
24. It is recommended that Focus Area 2 be amended to read:
- (a) “Target new transport investment where it will provide the greatest benefits to the most significant challenges”
25. There is also no Focus Area to recognise the role that transport infrastructure plays in enabling growth, both within the existing urban area (such as the City Rail Link) and in greenfield areas (new road and public transport networks).
26. It is considered a new Focus Area be included to read:
- (a) “Provide new transport investment to enable planned residential and business growth”
27. Stride has also made a submission on the Draft Auckland Plan consistent with the amendments sought above.

Project schedules

28. Stride generally supports the proposed schedules of projects, and seeks certainty of funding for projects where funding is not proposed to be committed, as summarised below (and in the appendices **attached**):
- (a) **Appendix A** to this submission is a list of projects from the schedule of funded Auckland Transport Capital Programme projects that Stride supports.⁸ Stride seeks that the funding for these projects be confirmed.
- (b) **Appendix B** to this submission is a list of projects from the schedule of currently unfunded Auckland Transport Capital Programme projects.⁹ Stride seeks that funding be allocated to these projects and that they be included in the funded capital programme.
- (c) **Appendix C** to this submission is a list of projects from the schedule of NZTA Investment Programme projects that Stride supports.¹⁰ Stride seeks that the funding for these projects be confirmed, and seeks further funding for the projects discussed in this submission.
29. The projects that Stride supports are consistent with the strategic direction and priorities of the Draft GPSLT and will assist in achieving the directions and focus areas of the Draft RLTP. The reasons for Stride’s support and the amendments sought are discussed further below.

⁸ Appendix 1 Table 1A, Draft Auckland Regional Land Transport Plan 2018-2028, 63-66.

⁹ Appendix 1 Table 1B, Draft Auckland Regional Land Transport Plan 2018-2028, 67-70.

¹⁰ Appendix 2, Draft Auckland Regional Land Transport Plan 2018-2028, 71-72.

Land transport funding is critically required as a result of significant population growth in Auckland and should be directed to encourage residential intensification in the right locations

30. The Draft RLTP outlines the significant population growth that has occurred, and is expected to occur in Auckland in the future.¹¹ Auckland is currently the fastest growing city in Australasia and over the next 10 years is expected to grow by an additional 300,000 people. By 2043, it is expected to have a population of 2.3 million people.
31. There has been a history of underinvestment in Auckland's transport infrastructure, particularly in regard to public transport.¹² The unprecedented growth in Auckland's population over the next decade is going to put further pressure on Auckland's existing transport infrastructure, which is already exceeding capacity. This will lead to congestion, increased travel times, impacts on the movement of people and goods, and reduced accessibility to employment, education and other activities.¹³
32. The Auckland Future Urban Land Supply Strategy July 2017 (**FULSS**) has identified the sequencing for the future urban areas. The priority areas include Red Hills, Whenuapai, Wainui East, Silverdale West and Dairy Flat. These greenfield areas have the advantage of being in close proximity to the existing centres at Westgate and Silverdale, and on the state highway network.
33. The Draft RLTP identifies that Auckland will need to move away from a city where the dominant mode of travel is by single occupant private vehicles, to a city where public transport and walking and cycling play a more important role.¹⁴
34. The residential growth in the north west and in the Silverdale catchment has the ability to support this change in travel mode, and it is important that transport infrastructure is provided to enable the development of these areas, and investment is made in public transport services to provide connections between these residential areas to centres and employment areas.
35. Importantly, there are a number of Auckland Transport projects that are currently listed as unfunded that are critical to providing safe and efficient access, and to support alternative travel modes to these priority greenfield areas.
36. Stride seeks that funding is confirmed for the Auckland Transport projects listed in **Appendix B** to this submission.

Investment in Light Rail along the northwest corridor to Westgate is supported and should be prioritised

37. As addressed above, Westgate is projected to be one of three significant nodes for Auckland. In addition, Westgate has the benefit of being a greenfields area that has undergone master-planning and structure plan processes to enable comprehensively designed and intensive residential development. This critical node is currently not serviced by rapid transit services, and the Draft RLTP provides the opportunity to ensure that rapid transit is provided and that this investment is future proofed.
38. The proposed light rail infrastructure in the northwest corridor will unlock the potential for growth in this area, and provide efficient connections to the City Centre. Light rail

¹¹ Draft Auckland Regional Land Transport Plan 2018-2028, 12.

¹² Draft Proposal for a Regional Fuel Tax for Auckland, 1.

¹³ Draft Auckland Regional Land Transport Plan 2018-2028, 17.

¹⁴ Draft Auckland Regional Land Transport Plan 2018-2028, 27.

stations along the route will also facilitate further urban renewal in the west, and provide economic investment and growth.

39. Stride agrees with the statement by the Hon Phil Twyford that light rail will be a game changer for Auckland commuters. Light rail will be a critical project that will get Aucklanders out of cars and onto public transport, which could not be achieved to the same extent by the alternative of providing busways along this corridor.
40. The NZTA Investment Programme project description provides that \$1.8 billion is committed to develop rapid transit from the city to the airport and along the northwest corridor over the period of the Draft RLTP.¹⁵
41. The Draft RLTP does not state the terminal point for the northwest corridor. It is understood that this is the Westgate Metropolitan Centre, however, this should be made clear in the project description.
42. Providing for a main station at the Westgate Metropolitan Centre, together with a park and ride facility and bus interchange (as discussed below), will further support the role and function of the centre as the main hub for the north west. This transit hub will fuel investment in the centre and support the establishment of a wide range of commercial, civic and residential activities.
43. It is also important that the investigations consider future connections, including route protection to extend the line to Kumeu. The 825 ha of future urban land in Kumeu will grow the population to around 25,000 residents over the next 30 years and this population should be served by efficient rapid transit.

Bus interchange and Park and Ride facilities are required to be confirmed for Westgate

44. The Auckland Transport Capital Programme (committed funding proposed) provides for the development of new and extended Park and Ride facilities at a cost of \$51m. The facilities are not identified, although separate projects are identified for park and ride facilities at Matiatia (\$15m) and Papakura (\$12m).
45. The Auckland Regional Land Transport Plan 2015-25 includes committed funding for a Park and Ride facility at Westgate. Auckland Council's asset schedule (Historic Projects) for which development contributions are to be used (and have been collected for) includes a Park and Ride facility at Westgate.
46. The Auckland Transport Capital Programme (currently unfunded) includes the proposal for a new bus interchange at Westgate.¹⁶ This project is for the development of an operational bus interchange at Westgate consisting of eight local bus stops with shelters and 10 layover spaces.
47. Stride seeks that the Westgate Park and Ride facility be identified as a separate line item with committed funding, and the Westgate bus interchange also be identified in the committed funding schedule.
48. The Westgate park and ride and bus interchange projects are critical in the short term to support public transport services in this high growth area that is currently under serviced by public transport. In addition, these projects are critical connector and support services for the proposed light rail network for when this comes on line.

¹⁵ Appendix 2, Draft Auckland Regional Land Transport Plan 2018-2028, 71.

¹⁶ Appendix 1 Table 1A, Draft Auckland Regional Land Transport Plan 2018-2028, 67.

49. The Westgate park and ride facility, bus interchange, and light rail station, need to be in proximity to each other to provide connectivity between travel modes and support the use of public transport. It is critical that these facilities are all located within the Westgate Metropolitan Centre zone to provide the most efficient travel patterns and access to goods, services, and employment.

NZTA SH 16/18 Motorway Connections at Brigham Creek and Northside Drive need funding allocated for construction in the period of the Draft RLTP

50. The NZTA Investment Programme schedule includes SH16 / SH18 Connection and Squadron Drive Improvements for the investigation of SH16 / SH18 motorway connections and interchange upgrades at Brigham Creek and Northside Drive.
51. To support the transport network serving the Westgate Metropolitan Centre it is critical that there be alternative connections to the motorway network to avoid congestion of the on and off ramps at Fred Taylor Drive (which bi-sects the Westgate Metropolitan Centre zone).
52. The local road network that serves the Westgate Metropolitan Centre and the residential development at Red Hills and Whenuapai needs to be supported by the extension of Northside Drive (as sought above) and motorway connections at this location.
53. The Northside Drive bridge over SH 16 has been designed and constructed to accommodate motorway connections.
54. Stride seeks that NZTA the project for SH 16 – SH18 Connection and Squadron Drive Improvements be amended to provide funding for the construction of SH 16 / 18 motorway connections and interchange upgrades at Northside Drive within the period of the Draft RLTP.

Summary of Relief Sought

55. Stride supports the Draft RLTP and the Proposed Fuel Tax, subject to the amendments proposed in this submission. Adopting the Draft RLTP as sought by Stride will ensure that the plan is consistent with the Draft GPSLTP and will deliver transport investment to support Auckland's growth.
56. Stride seeks the following relief:
- (a) The Proposed Fuel Tax be adopted.
 - (b) Focus Area 2 be amended to read: "Target new transport investment where it will provide the greatest benefits to the most significant challenges".
 - (c) Focus Area 5 be amended by removing the qualifier "Better", so it reads "Integrate land use and transport decisions".
 - (d) Add a new Focus Area to read: "Provide new transport investment to enable planned residential and business growth".
 - (e) Confirm the Auckland Transport Capital Programme funding for the projects listed in Appendix A to this submission.
 - (f) Provide a separate line item for the Westgate Park and Ride facility in the schedule of Auckland Transport Capital Programme committed projects.

- (g) Confirm funding for the currently unfunded Auckland Transport Capital Programme projects listed in Appendix B to this submission.
- (h) Confirm the NZTA funding for the projects listed in Appendix C to this submission.
- (i) Amend the NZTA project description for Light Rail for the north west corridor to provide that the corridor terminates at Westgate Metropolitan Centre, and that investigations will include extending the line to Kumeu.
- (j) Amend the NZTA project for SH16/SH18 Connections and Squadron Drive Improvements to provide for the construction of the Northside Drive connections to SH 16 within the period of the Draft RLTP.

57. Stride wishes to be heard in support of this submission.

DATED this 14th day of May 2018



Mark Luker
General Manager Development



Roy Stansfield
General Manager Shopping Centres

Appendix A: Auckland Transport Proposed Funded Capital Programme

Project name	Project description	Indicative project cost \$m	Stride position
Funds for Local Board priorities and to support housing growth			
Greenfield transport infrastructure projects	Greenfield transport infrastructure projects infrastructure programme to support high priority greenfield areas, including upgrade of existing corridor on Trig Road and new Redhills connection to urban arterial standard with appropriate public transport and active mode provision.	275	Support
Committed Projects and Programmes			
Wainui Improvements	Infrastructure programme to support Wainui growth area.	25	Support
Ring-fenced Projects and Programmes			
LRGF Huapai SHA	Station Road re-alignment and signalisation of SH16.	37	Support
Park and Ride Programme			
Park and Ride Programme	Delivery of new and extended park 'n' ride facilities.	51	Support with funding to be specifically allocated for a park and ride facility at the Westgate Metropolitan Centre that is integrated with the bus interchange and light rail station.
Corridor Improvements			
Penlink	A new connection between the Northern Motorway and the Whangaparāoa Peninsula, bypassing the constrained Silverdale interchange. This project is linked with a revenue stream from tolling and therefore includes an amount net of tolling revenue.	200	Support

Appendix B: Auckland Transport Capital Programme – additional items currently unfunded

Project name	Project description	Indicative project cost \$m	Stride position
Rapid Transport Network (RTN)			
Grand Drive (Orewa) bus station	Provision of a new bus station at Grand Drive (Orewa) as part of the Northern Busway extension to Grand Drive. The busway is included in the State Highway Programme.	30	Seek funding to be allocated
Other bus network improvements			
Bus Infrastructure Requirements	Provision for bus infrastructure to cater for growth.	181	Seek funding to be allocated
Westgate Interchange	Delivery of an operational bus interchange at Westgate consisting of 8 local bus stops with shelters and 10 layover spaces.	18	Seek funding to be allocated for bus terminal at the Westgate Metropolitan Centre that is integrated with the park and ride facility and light rail station.
Supporting Growth North			
Argent-Curley Ave extension	Extension of Curley Avenue in Silverdale across SH1 to connect with Argent Lane to the west to provide an east-west link across SH1, to support the growth in the Wainui area.	103	Seek funding to be allocated
Arterials Penlink to Bawden	Upgrading of Bawden Road between Postman Road Extension and the Penlink Redvale interchange on SH1.	40	Seek funding to be allocated
Arterials Wilks to Penlink	Upgrading and/or re-alignment of Kahikatea and Wilks Roads between Pine Valley Road in the west and Penlink in the east, integrating with proposed south-facing ramps at Wilks Road SH1 interchange.	31	Seek funding to be allocated
Postman Road East	New north-south road through business area of Dairy Flat from Pine Valley Road in the north to Dairy Flat in the south (near Bawden Road).	67	Seek funding to be allocated
Wainui North South Connections	Upgrade and urbanisation of existing roads and provision of new roads to enable household growth in Wainui East and Upper Orewa.	159	Seek funding to be allocated
Supporting Growth North West			
Hobsonville Road Upgrade	Upgrading existing Hobsonville Road to increase capacity for vehicles and/or public transport to cater for projected growth.	16	Seek funding to be allocated
New local road crossing(s) over SH18	New local road crossing over SH18 from Brigham Creek Road to Hobsonville Road to improve accessibility and enhance network resilience.	21	Seek funding to be allocated

Northside Drive East	Eastward extension of Northside Drive through the Redhills area to provide for growth.	48	Seek funding to be allocated
Redhills Fred Taylor Stage 2	Upgrade of north-south Fred Taylor Drive to provide for growth in the Redhills area.	135	Seek funding to be allocated
Redhills Network Coates-Riverhead Highway	Delivery of a new Redhills north-south arterial (between Coatesville Riverhead Highway and Royal Road) and four east-west arterials.	314	Seek funding to be allocated
Totara/Trig Rd Ext	North-south corridor via upgraded Totara and Trig Roads.	43	Seek funding to be allocated
Westgate to Greenhithe RTN Stations	Provision of two new bus stations along SH18 at Trig Road and Squadron Drive.	53	Seek funding to be allocated

Appendix C: New Zealand Transport Agency Investment Programme projects

Project name	Project description	Indicative project cost \$m	Stride position
Committed			
Completion of the Western Ring Route	Completion of Western Ring Route including SH16 widening from Lincoln Road to Westgate.	26	Support
Northern Corridor Improvements (NCI)	New motorway-to-motorway connection between SH18 and SH1.	Total NCI cost 576	Support
Rapid Transit initiatives identified in ATAP (April 2018)			
Light rail – City to Airport and Northwest Corridor	Provision of rapid transit along the City to Airport and Northwest corridors. Delivering light rail on these corridors will require significant investment, but also provides a substantial opportunity to explore third party funding and financing arrangements. An allocation of \$1.8 billion is proposed as part of ATAP which will be used to leverage funding and financing to progress both corridors over the period of this RLTP.	1800	Support with a terminal point for the northwest light rail corridor located at Westgate Metropolitan Centre, and future proofing the line to Kumeu.
Corridor Improvements			
SH16-SH18 Connection and Squadron Drive Improvements	Investigate SH16/18 motorway connections and interchange upgrades at Brigham Creek and Northside Drive.	5	Seek committed funding for the construction of motorway connections at Northside Drive within the period of the Draft RLTP.

11 May 2018

Cynthia Gillespie
Chief Strategy Officer Strategy Division
Auckland Transport
20 Viaduct Harbour Avenue, Level 6, Auckland CBD
Private Bag 92250, Auckland 1142

Dear Cynthia

Below is a submission on the Draft Regional Land Transport Plan 2018 – 2018

Sunnynook Community Association believes that the following priorities should be added to the Draft Regional Land Transport Plan, 2018 -2028

1. Plan to up-grade the Sunnynook busway stop. The Sunnynook stop is in the middle of a residential area, unlike all of the other stops on the busway. The Unitary Plan allows for significant intensification of the area around the Sunnynook stop. Thirtyfour thousand and twenty nine (34,029) people boarded the bus at Sunnynook in February 2018 and that was before universities and tertiary institutions recommenced.
2. The exit from the busway on the south side is a major problem for the elderly, disabled, and for mothers with small children. There is need for a lift. This could be on the south side of the overhead bridge
3. The foot path across the motorway from the bus stop is too narrow for the number of children going to and from the schools in Target Road and in Becroft Drive. As the population increases this will be a significant problem and a health and safety problem. There is need for a separate walkway.
4. Auckland Transport issued a very good map of Sunnynook when the bus way was opened showing 5, 10 and 15 minutes walking distance from the busway. However the public tell us that in winter, walking from the busway home does not feel safe as the street lighting is inadequate and there are many black spots. To encourage people to walk, there needs to be excellent lighting for up to 15 minutes walking from the busway.

Peter McNee
Chair of Sunnynook Community Association

2018

Ben Ross

Talking Southern
Auckland



Picture 1: Manukau Bus Station with MIT and rail station in the background

[REGIONAL LAND TRANSPORT PROGRAM AND REGIONAL FUEL TAX SUBMISSION]

Submission to the Regional Fuel Tax and Regional Land Transport including reallocation, support and request to remove projects.

Regional Land Transport Program and Regional Fuel Tax Submission

Ben Ross

2018

Blog: [Talking Southern Auckland](#)

Twitter: [@TalkingAuckland](#)

LinkedIn: [LinkedIn – Ben Ross](#)

Email: Ben.R001@gmail.com

Contents

Section 1: Regional Fuel Tax	4
Project 1: Bus Priority Improvements.....	4
Project Three: Improving Airport Access.....	7
Project Nine: Active Transport	10
Project Eleven: Mill Road.....	10
Regional Land Transport Program	11
The following projects should be upgraded from Auckland Transport’s Capital Program – additional items currently unfunded (Appendix 1 Table 1B):.....	11
The following projects should be downgraded from Auckland Transport’s FUNDED Capital Program (Appendix 1 Table 1A): – to additional items currently unfunded or deleted from RLTP.....	14
Cost Movements to RLTP.....	16
Other	17

Section 1: Regional Fuel Tax

For general ease in cross-referencing my submission with the official document I will be going in order of projects mentioned and whether I agree, disagree or have further comment.

In general I support the Regional Fuel Tax being implemented as a temporary measure while Congestion Charging and Value Capture Taxes are worked through from Central Government.

Project wise I am in general support but will comment on each one specifically.

Project 1: Bus Priority Improvements

I disagree with this project due to the priorities listed on page six of the Regional Fuel Tax document. The entire Great South Road and Manukau Station Road should also be priority one for bus lanes due to:

1. Southern Auckland was first to receive the New Network in 2016 yet has not had the infrastructure built to match what was earlier stated by Auckland Transport in supported the Frequent Service Network
2. Per the ATAP document and fact sheets¹:
 - a. Southern Auckland is now the largest sub region of Auckland and will remain that way
 - b. 2018: 550,000 to Central Auckland's 460,000
 - c. 2028: 650,000 to Central Auckland's 550,000
 - d. 2038: 710,000 to Central Auckland 610,000
 - e. Southern Auckland is set to grow at 30% to the Isthmus's 29%
 - f. Isthmus does have the largest employment centre – the City Centre that employs 15% of Auckland's population
 - g. Southern Auckland has the four of the five heavy industrial complexes (Airport, East Tamaki/Highbrook, Wiri and Drury South) with the Airport complex expanding rapidly

¹ [Breaking Down the #ATAP and What it Means for Southern Auckland. A Prelude to the Upcoming RLTP](#)

- h. Southern Auckland houses one of Auckland's three Nodes under the Auckland Plan 2050 and historically our second (minor) city centre – Manukau City Centre
3. The Great South Road is the primary north-south road spine (apart from the Southern Motorway) and Manukau Station Road is the main access road to the Manukau Bus Station
4. 50% of Southern Auckland residents commute within Southern Auckland for work according to Ministry of Transport 2013 study into commuting patterns
5. Great South Road should be used for local or even sub regional trips (just as is intended by the Mill Road project in ATAP) freeing up the Southern Motorway for inter-regional traffic

So I ask that the RFT and RLTP be juggled to have bus lanes on the Great South Road starting from the Puhinui Road intersection all the way down to the Queen Street intersection in Papakura as well as bus lanes down the entire length of Manukau Station Road to allow Frequent Service Network busses to travel along the Great South Road and all busses using Manukau Station Road to access the Manukau Bus Station.

Doing this would promote the following Government Policy Statement strategic directions:

- **Access:** that is allowing greater access to the bus network through more reliable service running provided by the bus lanes
- **Safety:** More people that choose to travel by bus means less cars on the road and less risk from congestion to other road users
- **Environment:** like Access and Safety having the busses travelling more reliable in key transport areas like the Great South and Manukau Station Roads allows for environmental benefits as more users switch from car to bus thus contributing less to Climate Change emissions



Picture 2: Source - Auckland Transport



Picture 3: Manukau City Centre. Source: Panuku

Project Three: Improving Airport Access

This project seems to have mashed together Airport to Botany Rapid Transit via Manukau and Puhinui Station, and other smaller projects such as improved bus services at New Lynn, Mt Roskill and Onehunga. These bus improvements need to be fully separated into their own RFT project category away from the Botany to Airport RTN project (or the Southern Airport Line as I call it).

The reason for this is clarity and legibility especially with the Southern Airport Line and its inter-regional role compared to more localised roles of bus improvements at New Lynn and Onehunga.

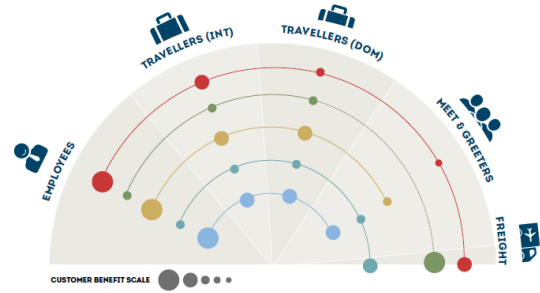
The current ATAP and thus the RFT seems to be undercooking the Southern Airport Line compared to the 2017 ATAP predecessor. The 2017 ATAP had Manukau, Puhinui (with a new interchange at Puhinui Station) and the Airport as an accelerated package with a BCR of 3.0. The 2018 ATAP and RFT have dropped off the Manukau to Puhinui leg even when the BCR for the entire section was 3.0? Why is this if the RFT is enabling Line to be accelerated to 2021 completion?

The RFT should be funding the Southern Airport Line from the Airport to Manukau including the interchange at Puhinui as stage one of the full Southern Airport Line RTN project to Botany. Stage Two from Manukau to Botany needs to be completed by the time the Eastern Busway reaches Botany Metropolitan Centre.

EVALUATION - AIRPORT ACCESS PROGRAMME OF INTERVENTIONS - 2038



WHAT THIS PROGRAMME DELIVERS



Rapid Transit - Botany-Manukau-Airport	\$600M-\$1,400M	AT
Increased capacity on SH20	\$100M-\$200M	NZTA
INDICATIVE PROGRAMME CAPITAL COST	\$700M-\$1,600M	

Picture 4: Preferably by 2028 please

Project Nine: Active Transport

I agree with this in general but am wondering where is the funding towards the Greenways Program that would significantly boost active modes to/from schools, parks, transport centres and Centres? It seems the Greenways program has dropped off the list entirely which would mean we were wasting our time doing the submission work for it two years ago. Please fund the top 3 Greenways program from each Local Board please.

Project Eleven: Mill Road

Support fully what the ATAP, RFT and RLTP have for Mill Road.

Regional Land Transport Program

The following projects should be upgraded from Auckland Transport's Capital Program – additional items currently unfunded (Appendix 1 Table 1B) to Auckland Transport Proposed Funded Capital Program:

1. ***Level Crossing Safety Improvements at Grade Separation (\$424m)***. For the City Rail Link, the Third and Fourth Mains on the Southern Line, and the resulting in increased rail services to operate at maximum efficiency the rail crossings on the Southern and Eastern Line need to be all removed by 2025. Grade separation also improves safety of those passing through such as cars, trucks and pedestrians – something that will become more acute as the South and West continue to experience rapid population growth
2. ***Airport to Botany RTN via Manukau and Airport Access Improvements (Investigation, Route Protection and CAPEX) (\$259m)***. This project needs to be accelerated and completed within Decade 1 (by 2028) owing to:
 - a. Rapid population growth in Southern Auckland (30% of all growth through to 2038 (Isthmus is 29%))
 - b. Southern Auckland the largest sub region in Auckland²
 - c. As the ATAP and RFT acknowledges Southern Auckland including Howick is poorly served by transit

The CAPEX cost for the Manukau to Botany leg of Airport to Botany RTN can be easily covered by Value Capture Taxes especially if we allow Transit Orientated Developments around the Line's stations and corridor itself. This would make the project cost neutral while allowing community building³.

3. ***Howick to Pakuranga bus priority improvements (\$76m)***. With the Eastern Busway now fully funded and to go ahead not having bus priority improvements down Pakuranga Road from Howick to Pakuranga is near half baking the solution to get transit into South Eastern Auckland. Can we have

² [Breaking Down the #ATAP and What it Means for Southern Auckland. A Prelude to the Upcoming RLTP](#)

³ [The Southern Airport Line – More than a Light Rail Line – A Community and City Builder Too!](#)

this project bumped into the funding list please so that it is completed by the time the Panmure to Pakuranga section of the Eastern Busway is open please.

4. ***Grand Drive (Orewa) bus station (\$30m)***. This part of Auckland is also expanding quickly and due to its poor urban layout lacks decent transit options now and into the future as far as local busses go. Adding the bus station to Grand Drive (with a paid park and ride also built) would allow residents (current and future) an option of catching the extended Northern Express and relieve pressure on the Northern Motorway (also slowing down the need for an expensive widening program of said motorway)
5. ***Papakura new bus station (\$6m)***. The Papakura Bus/Rail interchange is already too small for current services let along any future services as Papakura's population continues to grow. \$6m is small change for a more efficient bus station and better user access.

Total new cost: \$795 million

Note:

1. The Level Crossing Safety Improvements at Grade Separation I expect to be half paid for by Auckland Transport and half by Kiwi Rail. This means Auckland Transport would need to fund \$212m
2. Botany to Airport RTN while it shows up as initial debt two cost factors come into play:
 - a. Project would be undertaken by NZTA rather than Auckland Transport similar to City Centre-Airport via Dominion Road
 - b. Value Capture Tax and Transit Orientated Developments along the corridor and stations can be ring fenced to “pay” for the full RTN Line allowing the project to become cost neutral while also community building as well

New costs to Auckland Transport: \$324m

New Costs to Kiwi Rail: \$212m

New Costs to NZTA: Initially \$259m although recouped by VCT and TOD ring fencing

The following projects should be downgraded from Auckland Transport's FUNDED Capital Program (Appendix 1 Table 1A): – to additional items currently unfunded or deleted from RLTP

1. ***Eastern Busway: Pakuranga Bus Station and Reeves Road Flyover (\$316m)***. Keep the Bus Station as funded but delete the Reeves Road Flyover probably saving us \$300m. With the Eastern Busway confirmed and having Howick-Pakuranga Bus Priority improvements bumped into RLTP funded projects (see page 11) the Reeves Road flyover can be removed entirely from the project. The flyover will caused induced car demand defeating the purpose of any transit improvements in the area. The ultimate consequence is lowering urban amenity in an area slated as a Town Centre under the Auckland Unitary Plan and can take intensification of up to 11 storeys. If we are trying to remove obnoxious monoliths like the Lower Hobson Street flyover why are we building a new flyover in the middle of a town centre?
2. ***Park and Ride Program (\$51m)***. Note: not all \$51m is being called to be removed. Park and rides in urban catchment areas can both defeat the purpose of a transit system (that is the provision of feeder busses or active modes to fill the first and last mile gap) while also causing localised congestion that we are trying to minimise in an urban environment. As for park and rides that serve rural catchments like Papakura – yes they do need to be supported and properly funded.
3. ***FTN/RTN Manukau to Drury, including Bremner and Opaheke Road Upgrade (\$65m)***. With the 33 Great South Road bus (that should be extended to a future Drury rail station), the three new rail stations (Drury, Drury West and Paerata) and the Southern Line why do we need a separate FTN/RTN route from the South to Manukau City Centre? This to me is duplicating existing services that could be upgraded (like the 33 and the 365) with either better frequencies or bus priority measures like bus lanes. Feeder busses should be feeding from the new Greenfield areas in the west of Papakura to Papakura Station until Drury and Drury Stations are built in which those feeder busses feed into those new stations. **Please delete the**

FTN/RTN Manukau to Drury from the RLTP and add Southern Rail Stations into funded RLTP section please (cost \$78m and that should come from development contributions and Housing Infrastructure Fund).

Total Cost Savings: \$385m (some road and transit projects where intermixed rather than being separated out so savings will not reflect nominal costs above)

Cost Movements to RLTP

Total costs or savings to Auckland Transport reflecting RLTP submission:

(+\$64m in savings compared to draft RLTP sent for out to consultation).

Extra costs to Kiwi Rail: \$212m to be paid for via the NLTF as it the project in question would meet the Government Policy Statement strategic directions of 'Safety' and 'Access.'

Extra cost to NZTA: \$259m although ring fencing Value Capture Tax and Transit Orientated Development contributions would mean the project is cost neutral. The Botany to Airport RTN would also meet the GPS strategic themes of Access, Safety, Environment and Value for money whiles the themes of integrated land-use/transport planning and Inviting Public Spaces.

Inviting public spaces

71. Creating spaces within the streetscape that are attractive and safe for people to sit, gather and walk and cycle supports the objectives of creating a safer and more accessible network, as well as key outcomes around improving health and well-being.

72. Well designed, attractive public spaces provide residents with places to gather, and attract people to frequent local businesses, connect with their neighbours and partake in recreational and cultural activities.

73. GPS 2018 will support investments that make streets more inviting places for people. This should encourage more housing development in these areas and more city living.

Source: **Draft-GPS**

Picture 5: Government Policy Statement page: 13

Other

1. Improving Airport Access. The Puhinui Bus/Rail interchange that forms part of the Southern Airport Line (Botany-Airport RTN) needs to be separated from the other bus improvement measures elsewhere in the City. See page 7 for more.

Submission ends



Shane Ellison
Chief Executive Officer
Private Bag 92250
Auckland 1142

Dear Shane

Draft Regional Land Transport Plan (2018-2028) Submission: Inclusion of Te Whau Pathway

We are making this submission to support the inclusion of Te Whau Pathway project in the Regional Land Transport Plan. This is a transformational project designed to create a 12 kilometre shared path linking Green Bay, New Lynn, Kelston, Glendene and Te Atatu at various stages over the next five years. It will be delivered as a community/council partnership between the Henderson-Massey and Whau Local Boards, Auckland Transport and Council.

The project supports the Auckland regional push to encourage the use of cycling as an alternative mode of transport. On average it is expected that it will attract 310 cyclists and 620 pedestrians per day in Te Atatu South, and an average of 290 cyclists and 580 pedestrians per day for other sections. The project will provide links for over 7,000 students in 23 schools and connects 30 parks. It will connect to the North- Western Cycleway, Te Atatu and Oakley Creek.

We believe that the Te Whau Pathway will be of enormous benefit to the community. Specifically, 98,000 residents within 1.6 km in Green Bay, Blockhouse Bay, New Lynn, Kelston, Glendene and Te Atatu will benefit directly from this project. Many of our West Auckland communities have a high deprivation index. There are obvious gains to be made in terms of social well-being and health outcomes for our constituents, for whom this network will be a low cost, viable transport corridor and recreational facility.

The project is included in the Auckland Transport Capital Programme under "additional items currently unfunded," with an estimated cost of \$94 million. The Whau Coastal Walkway Environmental Trust has raised nearly \$2.3 million since March 2015, which together with the contribution from the Whau and Henderson-Massey Local Boards, has enabled the construction of the first 1.7 kilometres. However, the project is now at a crossroads due to a lack of funding.

Economic analysis showed a net positive benefit/cost of 2.4, based on a preliminary scheme cost of \$64,246,000 (includes 30% contingency). We understand that \$7.9 million of Auckland Council, Auckland Transport and community funding has been invested to date and there is potential for the completed pathway to be promoted as a tourist destination due to its proximity to Te Whau and the upper reaches of the Waitemata Harbour. It would be a travesty if this project remained incomplete due to a lack of funding.

We urge you to include Te Whau Pathway in the Regional Land Transport Plan (2018-2028).

Yours sincerely

Three handwritten signatures in black ink. The first signature is 'C Sepuloni', the second is 'Deborah Russell', and the third is 'Phil Twyford'.

Hon Carmel Sepuloni

Dr Deborah Russell

Hon Phil Twyford

Member for Kelston

Member for New Lynn

Member for Te Atatū



14 May 2018

Auckland Regional Transport Committee
C/O Auckland Council
Private Bag 92300
Auckland 1142

rltp@at.govt.nz

Copy to: Maungakiekie-Tamaki Local Board and Cr Bartley

maungakiekie.tamakiboard@aucklandcouncil.govt.nz
josephine.bartley@aucklandcouncil.govt.nz

Submission to Proposed Regional Fuel Tax and Draft Auckland Regional Land Transport Plan 2018-28

Introduction and Summary

The Onehunga Enhancement Society Inc (**TOES**) welcomes the opportunity to make this submission to the draft Auckland Regional Land Transport Plan 2018-28.

TOES was established in 2011 to represent the Onehunga community and ensure transport, utilities and council plans delivered true value to the local community, businesses and residents.

Your on-line form sets out four key questions.¹ Our feedback on these questions is set out below. In summary:

- we agree that rapid population growth in Auckland has brought with it significant transport challenges and we support the focus in your proposals on public and active transport, which will free up road capacity;
- our preference is that demand management of our existing transport network be a key solution;
- while we support a regional fuel tax, we ask for mechanisms to reduce the negative impact of the tax on poorer communities;
- we support road corridor improvements together with enhancing network capacity as being a priority for us to make better use of the existing transport network and increase travel times through key routes and corridors ((such as the east-west connections between Onehunga, Penrose and Sylvia Park);
- we support: the upgrade of the Onehunga Rail Line; the Manukau Harbour Crossing (but we also ask that this incorporate light rail); route protection for public transport from Onehunga to the Airport; the revised East West road connections (rather than NZTA's East West Link); and ferries on the Manukau Harbour;
- we support the environmental improvements including: installation of Tetratrap catch-pit pollutant traps; inclusion of water sensitive design; and facilitating the increased uptake of electric vehicles, but also ask for reconsideration of some planning rules that are making it unnecessarily difficult to achieve sensible economic transport outcomes.

¹ See <https://at.govt.nz/about-us/transport-plans-strategies/regional-land-transport-plan/>

Question (1) – Draft Regional Fuel Tax Proposal

Your on-line consultation says that without a Regional Fuel Tax (RFT), the funding available will only cover renewing our existing transport network and the projects we have already committed to, eg the City Rail Link. You say that to enable you to deliver projects that improve congestion, public transport and road safety, you recommend an RFT of 10 cents per litre plus GST (11.5 cents). You have asked for our opinion on this proposal, and especially if we support it, are neutral or oppose this proposal.

We agree with your assessment that rapid population growth has brought challenges, including increased congestion, reduced accessibility, increased deaths and serious injuries on the road network, and increasing negative impacts on the environment.² We also accept that we are not going to address this problem simply by building more roads. Demand management of our existing network has to be a key solution, especially creating priority for freight and delivery movements.

We recognise the need to raise more funding for transport projects and services.

Our preference is to introduce initiatives that both manage demand and raise funding equitably as soon as possible (such as congestion charging), balanced with investment into affordable and more frequent public transport in order to effect sustainable behavioural change.

In the interim, we support a regional fuel tax of 10 cents per litre (plus GST) and the additional 9-12 cent per litre national fuel tax (to be brought in over the next three years), but ask for mechanisms to reduce the negative impact of the tax on poorer communities, such as through improved and less expensive public transport and active modes.

We also believe it is essential that the regional tax is hypothecated to spending on specific transport projects and services in Auckland and be reported on with complete detail and transparency.

Finally, we note that a regional fuel tax of 10 cents per litre is only a small step towards addressing the funding gap that the Auckland Transport Alignment Project (ATAP) identified. We request Auckland Council and the Government commit to urgently delivering fair and equitable solutions to fund this gap.

Question (2) –Regional Fuel Tax Projects

Your on-line consultation says that you are proposing to spend the Regional Fuel Tax (RFT) on various programmes and projects, including: (1) Bus priority improvements; (2) City centre bus infrastructure (facilities); (3) Improving airport access; (4) AMETI Eastern Busway; (5) Park and rides; (6) Electric trains and stabling (storage facilities); (7) Downtown ferry redevelopment; (8) Road safety; (9) Active transport (walking and cycling); (10) Penlink; (11) Mill Road Corridor; (12) Road corridor improvements; (13) Network capacity and performance improvements; and (14) Growth related transport infrastructure (transport services and facilities for new housing developments). You have asked how important these projects are for us.

While all programmes and projects are important, we have identified: (Item No. 3) Improving airport access; (Item No. 9) Active transport (walking and cycling); (Item No. 12) Road corridor improvements as well as (Item No. 13) Network capacity and performance improvements, as being very important to TOES.

Particular projects we wish to emphasise our support for are:

- The planned upgrade of the Onehunga Line to accommodate higher frequency services and longer trains;
- Manukau Harbour Crossing – dedicated shared path crossing between Onehunga and Mangere Bridge (but we also ask that this incorporate light rail)

² See *Draft Auckland Regional Land Transport Plan 2018-28*, page 3.

- East West local road connections (Local road improvements in Onehunga to support wider NZTA's East West Connections. The East West Connections project is under review)
- Investigation and Route Protection for Future Priorities (To facilitate investigation and route protection for New Lynn - Onehunga - Sylvia Park road and high priority projects planned for implementation beyond 2028).
- Completion of the Future Ferry Strategy (which must give consideration to public transport on the Manukau Harbour linking Onehunga, Cornwallis and Clarks Beach as well as reinforcing the Port of Onehunga as a key to a successful public transport system on the Manukau Harbour)

(Item No. 3) Improving airport access: With regard to airport access public transport improvements, we support the range of medium term capital improvements to support the provision of enhanced bus services from New Lynn, Mt Roskill, Onehunga and Botany to the airport precinct. We note that improvements are designed to be in place by 2021/22. We ask that there be a dedicated transport route corridor from Onehunga through the Mangere Bridge Village to the Auckland Airport as there is insufficient corridor space along SH20A and it is not close to high population densities (which make true public transport viable). This route also needs to take into account the rapid development in the Ihumatao area (involving large buildings with high staffing levels and some residential housing projects). As a growth and greenfield area, the Council and Auckland Transport need to secure a dedicated transport corridor with options for buses, light rail and heavy rail before the route becomes 'built out' and results in an expensive and protracted land acquisition process.

(Item No. 9) Active transport (walking and cycling): We note that the initial focus of the ten year walking and cycling programme is to complete the current Urban Cycleways Programme, with major improvements delivered in locations including Onehunga. We ask that the improvements in Onehunga be advanced so they are completed sooner as Onehunga is earmarked for growth.

(Item No. 12) Road corridor improvements: With regard to road corridor improvements, we agree that congestion on the arterial network is a significant concern, especially congestion on the freight network. While we agree that corridor improvement is important, we ask that the emphasis be first on improving the efficiency of existing urban corridors (such as the east-west connections between Onehunga, Penrose and Sylvia Park), and improving access to the Ports of Auckland port and Auckland Airport.³

(Item No. 13) Network capacity and performance improvements: With regard to network capacity and performance improvements, we agree that Auckland needs to make better use of its existing transport system to increase the number of people who can travel through key routes and corridors. We also support Auckland ensuring that the operation of existing transport infrastructure and services are optimised. The efficiency and coordination of traffic signals must be improved to enhance throughput and reduce delays. More dynamic traffic lanes must be introduced to improve peak traffic flows, and give priority to freight movements on key freight connections (such as the east-west connections between Onehunga, Penrose and Sylvia Park).⁴

Question (3) – Regional Land Transport Plan

Your on-line consultation says that Auckland's recent significant population growth has increased demand on the transport system and caused challenges that need to be addressed over the 10 years of the plan. These issues include safety, congestion, decreases in accessibility, impact on the environment, support growth in the region. You have asked whether we think you have correctly identified the most important transport challenges facing Auckland.

While we agree overall with the challenges you have identified (safety, congestion, decreases in accessibility, impact on the environment and supporting growth), as you also note, improving network capacity and performance by making the most of the existing transport system is key.

³ See Draft Auckland Regional Land Transport Plan 2018-28, page 45.

⁴ See Draft Auckland Regional Land Transport Plan 2018-28, page 40.

You have properly said that this must focus on optimising the transport network through targeted changes, such as improving the coordination of traffic lights, the use of dynamic lanes at peak times, and removing bottlenecks to mitigate congestion (such as the east-west connections between Onehunga, Penrose and Sylvia Park).⁵ Maximising the benefits from new technology and taking opportunities to influence travel demand are also important, as well as introducing pricing to address congestion as soon as possible.⁶

Also of concern for us are the impacts of transport on the environment, including contributing to the contamination of waterways through run-off, flooding and stormwater overflow due to infrastructure being unable to cope with extreme weather events, visual and noise pollution, loss of green space, and greenhouse gas emissions.

We support the proposed transport programme also including: • Rollout of LED street lighting across the Auckland region to reduce energy use; • Tetratraps – installation of catch-pit pollutant traps in the city centre, industrial areas, and marine sensitive areas to protect from road stormwater discharge; • Inclusion of water sensitive design as part of infrastructure development; • Investigating how to reduce emissions from marine transport including ferries; • Ensuring maintenance and operational practices minimise impacts on the environment; • Improving waste practices across infrastructure construction and facilities management; and • Facilitating the increased uptake of electric vehicles, including enabling the private sector to invest in and expand charging infrastructure.

However, we do hold concerns regarding Auckland Council's planning rules concerning Outstanding Natural Features (ONFs) as well as mangroves, sediment, and rock features in highly compromised areas (particularly in the upper Mangere Inlet) that are making it unnecessarily difficult to achieve sensible economic transport outcomes.

Question (4) – Funding Activities

Your on-line consultation asks us to indicate how important the following areas are to us: (1) Safety; (2) Public transport; (3) Walking and cycling; (4) Supporting growth areas; (5) Environment; (6) Network capacity and performance; and (7) Corridor and roading improvements. You have also asked if there are any other projects or activities we think should be included.

Again, as noted above, overall we believe network capacity and performance as well as road corridor improvements are very important, with the remaining areas also being important to us.

Conclusions

While we welcome the release of the Regional Land Transport Plan as well as the Auckland Transport Alignment Project Report and the greater certainty this now brings to funding, expenditure and broad delivery timeframes for transport projects across Auckland, we also need more detail on the precise timing and the relative priorities for both the funded and unfunded projects set out in the Plan.

It is also of utmost importance to us that early and clear channels of communication are established between the delivery agencies (such as Auckland Transport) and individual communities (such as Onehunga) as well as key stakeholders in those areas affected by the planned works (such as TOES) in order to facilitate a smoother transition and a more efficient outcome for the projects.

We ask for greater emphasis at Auckland Transport on working constructively with both the residential and business communities to find solutions (from the bottom up - not the top down) so as to avoid negative hearing processes. TOES also asks in this regard that the business delivery model used by Auckland Transport, Auckland Council and NZTA be overhauled to ensure partnership with communities in achieving transport outcomes.

⁵ See *Draft Auckland Regional Land Transport Plan 2018-28*, page 40.

⁶ See *Draft Auckland Regional Land Transport Plan 2018-28*, page 40.

Jim Jackson, Chair
The Onehunga Enhancement Society Inc
PO Box 13273, Onehunga
Auckland 1643
jim@jackson.co.nz

.....
B&A	20 Baxter Street
Urban & Environmental	Warkworth
•	0910
Whangarei	•
Warkworth	PO BOX 591
Auckland	Warkworth
Napier	0941
Christchurch
admin@barker.co.nz	T +64 9 422 3336
barker.co.nz	

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

By email: rltp@at.govt.nz

Dear Sir / Madam,

This submission is made on behalf of Turnstone Capital NZ Limited, Warkworth Trading Company Limited and other related entities.

Warkworth is the northern satellite town in the region. Significant urban growth is forecast and is planned for in this location. The population is projected to increase to 20 – 25 thousand people in the next 20 to 25 years. Ensuring that there is sufficient infrastructure capacity to provide for that growth must be a key consideration for Auckland Transport and Auckland Council; the Regional Land Transport Plan (“RLTP”) is one policy through which that capacity may be addressed.

A number of transport projects are proposed for the Warkworth area to mitigate the effects of the planned growth on existing roading infrastructure, and to protect the amenity of the existing town centre and surrounding areas. However, a number of those projects are still shown within the RLTP as unfunded.

Of particular concern for our clients is that the Western Collector remains unfunded. This is a critical link to enable the future growth of Warkworth and must be prioritised as part of the Warkworth Structure Plan process. This project is also one of four key transport projects listed in the Draft documents for the Warkworth Structure Plan currently being undertaken by Council.

The proposed increase in the transportation component of the draft Development Contributions Policy, the targeted transport rate within the Rodney District and the potential for a regional fuel tax are all significant costs. It is submitted that such an increase must be reflected in improved levels of service and improved capacity for growth. This submission therefore seeks to ensure that those projects that are critical to the planned growth of the Warkworth area, such as the Western Collector, are prioritised and funded.

Yours faithfully



Burnette O'Connor
Senior Associate
Mob: 021 422 346



Elizabeth Molloy
Resource Management Consultant
027 601 7922



Urban & Environmental

.....
B&A
Urban & Environmental
•
Whangarei
Warkworth
Auckland
Napier
Christchurch

.....
20 Baxter Street
Warkworth
0910
•
PO BOX 591
Warkworth
0941

.....
admin@barker.co.nz
barker.co.nz

.....
T +64 9 422 3336

Email: burnetteo@barker.co.nz

elizabethm@barker.co.nz

B&A

Urban & Environmental

.....
B&A	20 Baxter Street
Urban & Environmental	Warkworth
•	0910
Whangarei	•
Warkworth	PO BOX 591
Auckland	Warkworth
Napier	0941
Christchurch
admin@barker.co.nz	T +64 9 422 3336
barker.co.nz	

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

By email: rltp@at.govt.nz

Dear Sir / Madam,

This submission is made on behalf of Turnstone Capital NZ Limited, Warkworth Trading Company Limited and other related entities.

Warkworth is the northern satellite town in the region. Significant urban growth is forecast and is planned for in this location. The population is projected to increase to 20 – 25 thousand people in the next 20 to 25 years. Ensuring that there is sufficient infrastructure capacity to provide for that growth must be a key consideration for Auckland Transport and Auckland Council; the Regional Land Transport Plan (“RLTP”) is one policy through which that capacity may be addressed.

A number of transport projects are proposed for the Warkworth area to mitigate the effects of the planned growth on existing roading infrastructure, and to protect the amenity of the existing town centre and surrounding areas. However, a number of those projects are still shown within the RLTP as unfunded.

Of particular concern for our clients is that the Western Collector remains unfunded. This is a critical link to enable the future growth of Warkworth and must be prioritised as part of the Warkworth Structure Plan process. This project is also one of four key transport projects listed in the Draft documents for the Warkworth Structure Plan currently being undertaken by Council.

The proposed increase in the transportation component of the draft Development Contributions Policy, the targeted transport rate within the Rodney District and the potential for a regional fuel tax are all significant costs. It is submitted that such an increase must be reflected in improved levels of service and improved capacity for growth. This submission therefore seeks to ensure that those projects that are critical to the planned growth of the Warkworth area, such as the Western Collector, are prioritised and funded.

Yours faithfully



Burnette O'Connor
Senior Associate
Mob: 021 422 346



Elizabeth Molloy
Resource Management Consultant
027 601 7922



Urban & Environmental

.....
B&A
Urban & Environmental
•
Whangarei
Warkworth
Auckland
Napier
Christchurch

.....
20 Baxter Street
Warkworth
0910
•
PO BOX 591
Warkworth
0941

.....
admin@barker.co.nz
barker.co.nz

.....
T +64 9 422 3336

Email: burnetteo@barker.co.nz

elizabethm@barker.co.nz

B&A

Urban & Environmental



AUCKLAND COUNCIL'S DRAFT REGIONAL LAND TRANSPORT LONG TERM PLAN AND REGIONAL FUEL TAX

SUBMISSION BY UNIVERSAL HOMES LTD

Submitter Details:

1. Name: Universal Homes Ltd
2. Address for Service:

Postal: c/- Haines Planning
PO Box 90842
Victoria Street West
AUCKLAND 1142

Email: karen.joubert@hainesplanning.co.nz
3. Contact Person: Karen Joubert, Director
4. Date of Submission: 14 May 2018

Context of Submission:

5. Universal Homes Ltd (Universal) develops land and builds homes throughout Auckland and further afield. The Redhills Precinct of the Auckland Unitary Plan (Operative in Part) (AUP(OP)) in a new predominantly residential suburb forming a significant part of Auckland's north western growth sector.
6. As early as 1999, the Regional Growth Strategy identified Redhills area as "future urban expansion". This subsequently informed the Sector Agreement and Waitakere Growth Strategy prepared in response to the Local Government (Auckland) Amendment Act 2005, giving rise to the Northern Strategic Growth Area (NorSGA) initiatives. The Redhills area was then scheduled as a long term (2021 to 2050) urban area.

7. After October 2010, ownership of the NorSGA project (renamed North West Transformation) transferred to Auckland Council. The Council largely adopted the growth vision for this area in its Auckland Plan and identified Auckland's north west as one of the eight priority areas for growth and development within the Auckland region. Plan changes 13, 14 and 15 to the Waitakere District Plan represented Stage One of the North West Transformation.
8. Council initiatives have continued to prioritise the Westgate/North-west area as the preferred growth direction through the major investment of Council funds (\$325 million) in the new Westgate shopping centre and surrounds. This investment, which was directed towards the provision of public infrastructure for Westgate, excluded the planning costs of PC14 and PC15. The Westgate Precinct Plan (developed under PC15 and carried forward into the Auckland Unitary Plan) further assists the Redhills Precinct, especially in regard to the alignment of connecting strategic roads between the Redhills and Westgate Precincts.
9. Significant ratepayer investment in the northwest was also amply reflected in central government's investment in the SH16/18 motorway extensions and connection to the SH1 Northern Motorway. Coupled with these investments is the Waterview tunnel project (\$1.4 billion), which completed the Western Ring Route. That project further spotlights the North-west as a highly accessible and attractive metropolitan growth area. And, now, central government has announced the development of a light rail rapid transport route following the North Western Motorway alignment to provide high level connectivity with the Auckland Isthmus and CBD.
10. The former Auckland Regional Policy Statement (RPS) had identified the Redhills area for development in the period post-2020. Until the notification of the Proposed Auckland Unitary Plan (PAUP), the Metropolitan Urban Limit (MUL) had followed Fred Taylor Drive, being State Highway 16, thereby dampening the release of Redhills for housing supply purposes.
11. However, in more recent times, Council's Housing Project Office (HPO) and subsequently the Development Programme Office (DPO) have acknowledged that the Redhills area is vital if the Council is to provide Auckland with a seven year forward land supply for housing, as targeted by the Auckland Plan 2050 and the Auckland Unitary Plan (AUP). Consequently, the Council supported the eastern sector of the Redhills Precinct being afforded Special Housing Area (SHA) status in 2014.
12. Based on Redhills' strategic location adjacent to the Westgate/Massey North Metropolitan Centre, the Fred Taylor Road arterial and State

Highways 16 and 18, the PAUP Independent Hearing Panel (IHP) recommended that the Redhills Precinct be live zoned. The Council adopted the IHP recommendation, resulting in the Redhills zonings now being fully operative. The current Environment Court Appeal on the Redhills Precinct relates only to the location of the arterial road shown on the Redhills Precinct Plan 1.

13. The Council's recently updated Future Urban Land Supply Strategy (FULSS) and proposed Auckland Plan 2050 have also recognised the importance of the Redhills Precinct to provide in excess of 10,000 dwellings, that being four-plus times the 2,500 dwellings yield projected for Hobsonville Point. According to these Development Strategies, Redhills has been sequenced as top priority falling in Year 1.
14. Recognising the opportunity for Redhills to provide new homes at volume and at pace, central government has allocated \$300 million from its Housing Infrastructure Fund (HIF) for transport and Three Waters bulk infrastructure in Redhills and Whenuapai combined.

Scope of Submission:

15. Property Address:

Lot 5 DP 52123 (2-4 Dunlop Road, Massey);
Lot 1 DP 173727 (54 – 58 Fred Taylor Drive, Massey);
Lot 2 DP 64737 (60 Fred Taylor Drive, Massey);
Lot 1 DP 64737(62 Fred Taylor Drive, Massey);
Lot 3 DP 52123 (64 Fred Taylor Drive, Massey);
Lot 4 DP 52123 (66 Fred Taylor Drive, Massey);
Lot 6 DP 52123 (68 - 70 Fred Taylor Drive, Massey);
Pt Lot 11 DP 52123 (524 – 526 Don Buck Road, Massey);
Lot 10 DP 52123 (528 Don Buck Road, Massey);
Lot 9 DP 52123 (530 Don Buck Road, Massey);
Lot 2 DP 206623 (536 Don Buck Road, Massey); and
Lot 1 DP 94840 (550 Don Buck Road, Massey).

16. Currently in its initial stages of construction, Universal's West Hills development comprises a total landholding of 41.6 hectares within the approximate 600-hectare Redhills Precinct. The West Hills land is zoned Terrace Housing and Apartment Building and Mixed Housing Urban. It will deliver around 1,500 dwellings in a range of medium to high density residential typologies.
17. The Redhills Precinct Plan 1 indicates future east-west and north-south arterial routes through the Precinct. The Redhills Precinct provisions control the timing of development so that it occurs in accordance with sequenced transport network infrastructure upgrades

to service development up to, and not beyond, dwelling number thresholds. The transport infrastructure upgrades, at different dwelling thresholds, include:

- a. signalisation and upgrading of existing and new intersections;
- b. widening of existing Fred Taylor Drive and Don Buck Road;
- c. North-western busway and bus station at Massey North; and
- d. Northside Drive East overbridge.

18. As long as these transport upgrades remain unfunded, the Council's ability to support housing delivery in Redhills, the Auckland Plan's most significant top priority area for Years 1 to 3, will be hindered.

Submission:

19. The submitter opposes the provisions identified in the attached Schedule for the reasons set out therein.
20. The Transport Consultation-Feedback Form is attached as **Annexure 1** and further detailed feedback is at **Annexures 2** and **3**.
21. The ARLTP relies on the Council's utilisation of the HIF funding made available by Central Government. However, the affected landowners have not been consulted or informed of the business case mounted by the Council to access the HIF funding. This submission is therefore based on partially available information for transport funding. The submitter therefore reserves the right to update this submission once it has received the Council's response to an Official Information and Meetings Act 1987 (LGOIMA) request for a copy of the Council's Business Case for the Housing Infrastructure Fund.
22. The submitter supports other ARLTP and RFT proposals, as notified, and not specifically identified in the attached Schedules, to the extent that they are acceptable to the submitter's property and business interests. The submitter reserves the right to oppose, and present evidence to the Hearing Panel on changes to any of the notified ARLTP and RFT proposals which, in the opinion of the submitter, might adversely impact on their property and/or business interests.
23. The submitter requests the changes set out in the "Funding Decision Requested" column of Annexures 2 and 3, together with any additional or consequential changes needed to substantively address the submission points.
24. The submitter would be pleased to discuss the content of this submission further with Council staff as part of their reporting to the Hearing Panel.

25. The submitter wishes to be heard in support of this submission.

Signed for and on behalf of Universal Homes Ltd:



Karen Joubert

c.c Universal Homes Ltd

by Email

2074.13 RTLTP & RFT SUB

■ **Annexure 1**

Transport Consultation-
Feedback Form



Draft Proposal for a Regional Fuel Tax and Draft Regional Land Transport Plan

FEEDBACK FORM

Feedback must be received by 8pm on Monday 14 May 2018.

Please read the documents available at akhaveyoursay.nz or at any library, service centre or local board office before you give feedback. They have more information about the issues and choices that we want your feedback on.

All of the questions below are optional. We encourage you to give feedback online at akhaveyoursay.nz, or you can complete this form and return it to us using one of the options below.

Email

Scan your completed form and email it to akhaveyoursay@aucklandcouncil.govt.nz.

In person

Drop your completed form off at your local library, service centre or local board office.

By post

Place your completed form in an envelope and send it to freepost address:
AK Have Your Say
Auckland Council
Freepost Authority 182382
Private Bag 92 300, Auckland 1142

Your name and feedback will be included in public documents. All other personal details will remain private.

First name: Karen

Last name: Joubert

Email address or postal address:

karen.joubert@hainesplanning.co.nz

Your local board: Henderson-Massey

Is your feedback on behalf of an organisation or business?
(If yes, this confirms you have authority to submit on the organisation's behalf)

Yes No

Name of organisation or business:

Universal Homes Limited

The following information is optional but will help us know whether we are hearing from all Aucklanders.

Are you: Female Male Gender diverse

What age group do you belong to?

Under 15 15-24 25-34 35-44
 45-54 55-64 65-74 75+

Which of the following describes your ethnicity?
(Please select as many as apply)

Pākehā/NZ European Māori Samoan
 Cook Islands Māori Tongan Chinese
 South East Asian Korean Indian
 Other (please specify)

Do you consider yourself part of the following communities?

Rainbow (LGBTQIA+)
 Disability

QUESTIONS RELATING TO THE DRAFT PROPOSAL FOR A REGIONAL FUEL TAX

To answer the following questions, please read the draft proposal document. All of these questions are optional.

Question 1

Without a Regional Fuel Tax (RFT) the funding available will only cover renewing our existing transport network and the projects we have already committed to for example the City Rail Link.

To enable us to deliver projects that improve congestion, public transport and road safety, we recommend an RFT of 10 cents per litre plus GST (11.5 cents). What is your opinion on this proposal?

Support Do not support Other

Please comment: [Refer Annexure 3](#)

Question 2

We are proposing the RFT funds the projects listed below. How important are these projects to you?

	Very important	Moderately important	Less important
Project 1: Bus priority improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 2: City centre bus infrastructure (facilities)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Project 3: Improving airport access	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Project 4: AMETI Eastern Busway	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Project 5: Park and rides	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 6: Electric trains and stabling (storage facilities)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Project 7: Downtown ferry redevelopment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Project 8: Road safety	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 9: Active transport (walking and cycling)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Project 10: Penlink	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Project 11: Mill Road Corridor	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Project 12: Road corridor improvements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project 13: Network capacity and performance improvements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Project 14: Growth related transport infrastructure (transport services and facilities for new housing developments)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Any other comments?

[Refer to Annexure 3](#)

QUESTIONS RELATING TO THE DRAFT REGIONAL LAND TRANSPORT PLAN

To answer the following questions, please read the draft document. All of these questions are optional.

Auckland's recent significant population growth has increased demand on the transport system and caused challenges that need to be addressed over the 10 years of this plan. These issues include:

- safety
- impact on the environment
- congestion
- supporting growth in the region.
- decreases in accessibility

Question 3

Do you think we have correctly identified the most important transport challenges facing Auckland? Yes No

If No, what do you think should be included?

Question 4

To help us understand whether we have the allocation of funding right, please indicate how important the following areas are to you:

	Very important	Moderately important	Less important
Safety: high-risk road upgrades; speed management; monitoring of high-risk areas.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public transport: extending the rapid transit network; bus priority lanes; new electric trains.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Walking and cycling: cycleways to make cycling safer; new footpaths and widening existing footpaths; promoting walking and cycling.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Supporting growth areas: funding for transport infrastructure in high-priority greenfield areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Environment: making street lighting more energy efficient; encouraging use of electric vehicles; reducing pollution from road discharge into stormwater drains.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Network optimisation: dynamic traffic lanes; synchronising traffic signals; optimising road layout.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Corridor improvements: new local roads; upgrades to existing roads; upgrades to State Highways.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 5

Are there any projects or activities you think should be included? Yes No

If Yes, what are these?

[Refer to Annexure 2](#)

■ **Annexure 2**

Draft ARLTP Submission
points



UNIVERSAL HOMES LIMITED: Submission on Draft Auckland Regional Land Transport Plan (ARLTP)

d	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
1.	02. Purpose and Scope of the RLTP	Objectives, priorities and measures for 10 years	Support in part	<p>Some of the strategic documents which the RLTP seeks to align with have a 30-year horizon (e.g. Auckland Unitary Plan and Auckland Plan 2050).</p> <p>This can distort the immediate critical 10-year transport priorities as a 30-year horizon relies on high level predictive projections for population growth and demand for certain modes of transport. A too distant horizon can also cause longer term priorities to compete with and trump immediate priorities resulting in the latter being misrepresented and left unfunded.</p> <p>An example is funding for the proposed arterial routes in the Redhills Precinct, currently leading nowhere (i.e. west of the Rural Urban Boundary into Rural zoned land and north into Future Urban zoned land, which is prioritised for Years 11-30 in the Auckland Council's Council Development Strategy).</p> <p>Investment in the existing arterials Fred Taylor Drive, Whenuapai and Don Buck Road, Massey, will align much more with the Government Policy Statement on Land Transport (GPS) than funding the future arterial routes in the Redhills Precinct. The absence of funding will not preclude these future routes being developed as part of subdivision applications and vested at no cost in the Council/Auckland Transport as collector roads.</p>	<p>In line with the Government Policy Statement on Land Transport's (GPS) "Value for money" strategic priority for 2018-2028 to deliver the "right infrastructure at the right level at the best cost", funding should be provided through the ARLTP for the upgrade of Fred Taylor Drive, Whenuapai and Don Buck Road, Massey.</p>

UNIVERSAL HOMES LIMITED: Submission on Draft Auckland Regional Land Transport Plan (ARLTP)

d	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
2.			Oppose in part	<p>Fred Taylor Drive, has long been subject to a designation for its widening, having previously been part of the state highway network (SH16) The need to widen Fred Taylor Drive is caused by a lack of an alternative on-ramp onto SH 16 for areas further northwest. Also, some of the Fred Taylor Drive upgrades, now being made the responsibility of Redhills developers, are long overdue as part of the legacy Waitakere Council Plan Change 15 (NorSGA) requirements for the Westgate Precinct.</p> <p>The demand for the proposed future arterials is not generated by development in Redhills but other areas beyond, such as Kumeu/Huapai and Riverhead. Full development of these Future Urban Zone areas is projected to be realised by 2046, which is some 20 years beyond the RLTP's 10-year horizon. The delivery of housing in Redhills is not dependent on these arterials as collector roads are sufficient to serve the demand from future Redhills residents.</p> <p>The Auckland Transport Alignment Project (ATAP), which also has a 10-year horizon, seeks to balance transformational changes while also addressing the critical transport challenges that Auckland currently faces. The current relief required for SH 16 is proposed to be funded in the ARLTP. This further negates the demand for the proposed arterial routes in Redhills, while Fred Taylor Drive and Don Buck Road, which are already under stress due to their regional functions, are proposed to remain unfunded. This approach in the Draft ARLTP does not align with strategic network optimisation.</p>	<p>Aligned with ATAP objectives, Fred Taylor Drive and Don Buck Road should be upgraded to accommodate public transport, walking and cycling, to alleviate their current capacity constraints and to enable the substantial provision of housing in the North-western sector. These works need to be funded accordingly through the ARLTP.</p>

UNIVERSAL HOMES LIMITED: Submission on Draft Auckland Regional Land Transport Plan (ARLTP)

d	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
				While the Auckland Plan 2050 has a 30-year horizon, it seeks to make better use of existing transport networks which, in the case of Redhills, involves only Fred Taylor Drive and Don Buck Road. Upgrading of these existing routes will enable new transport investment to be targeted in a manner that directly supports growth. This being one of the most significant challenges for Auckland.	
3.	03 Auckland's Challenges	Environment	Support in part	To address environmental impacts over the next 10 years, existing major routes (Fred Taylor Drive/Don Buck Road), must be managed to achieve the balance between movement and place and reduce the physical disconnect between Redhills and Westgate Metropolitan Centre.	Upgrade Fred Taylor Drive/Don Buck Road as attractive urban streets to minimise environmental impacts and create a sense of place including planting of street trees.
4.	04. Addressing Auckland's Challenges	Strategic Approach	Support in part	<p>A dedicated bus lane and cycle way on Fred Taylor Drive/Don Buck Road that can feed into the proposed light rail and the Westgate public transport terminal will contribute to achieving Auckland's goals, as set out in the ARLTP, whose primary focus is to reduce reliance on the private car and to support housing and development in Redhills.</p> <p>Upgrading the high-risk intersections and applying speed management on Fred Taylor Drive/Don Buck Road will address the negative impacts of the current transport system, which is unsafe for pedestrians/cyclists. Making the most of the existing transport system in the Fred Taylor Drive/Don Buck Road arterials is key to optimising the Northwestern transportation network and removing bottle necks to mitigate congestion. Accessibility to public transport for the Northwest will support housing and development.</p>	Upgrade of Fred Taylor Drive/Don Buck Road to improve access to public transport and, in so doing, support growth in the wider Northwest and accelerating the Northwestern Rapid Transport Network.

UNIVERAL HOMES LIMITED: Submission on Draft Auckland Regional Land Transport Plan (ARLTP)

d	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
5.	04. Addressing Auckland's Challenges	Strategic Approach	Support in part	<p>A dedicated bus lane and cycle way on Fred Taylor Drive/Don Buck Road, that can feed into the proposed light rail route, will contribute to achieving Auckland's goals set out in the ARLTP while the primary focus is to reduce reliance on the private car and to support housing and development in Redhills.</p> <p>Upgrading the high-risk intersections and applying speed management on Fred Taylor Drive/Don Buck Road will address the negative impacts of the transport system, which is unsafe for pedestrians/cyclists.</p> <p>Making the most of existing transport system in the Fred Taylor Drive/Don Buck Road arterials is key in optimising the Northwestern transportation network and removing bottle necks to mitigate congestion. Accessibility to public transport for the Northwest will support housing and development.</p>	Upgrade Fred Taylor Drive/Don Buck Road to improve access to public transport and, in so doing, support growth in the wider Northwest and accelerate the Northwestern Rapid Transport Network.
6.		Access, Rapid Transit and Buses, Network Capacity and Performance Improvements	Support in part	<p>Investment in public transport via Fred Taylor Drive/Don Buck Road and the proposed Westgate park and ride will significantly reduce the travel times and improve access to the Isthmus and CBD from the Northwest.</p> <p>Make better use of existing transport system by increasing the number of people travelling on key routes e.g. Fred Taylor Drive/Don Buck Road. New investment should only occur when the existing capacity has been fully utilised.</p>	Upgrade Fred Taylor Drive/Don Buck Road and develop new park and ride facilities at Westgate to improve access to public transport and, in so doing, support growth in the wider Northwest and accelerate the Northwestern Rapid Transport Network.

UNIVERAL HOMES LIMITED: Submission on Draft Auckland Regional Land Transport Plan (ARLTP)

d	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
7.		Supporting Growth	Support in part	<p>Major new greenfield growth areas will occur in the Northwest, especially Redhills. Redhills' strategic location on former SH16 and directly opposite the Westgate/Massey North Metropolitan Centre means that it does not require substantial investment from the Council/Auckland Transport compared to less strategically located greenfield areas. Collector roads required for development within the Redhills Precinct will be developed at no cost to the Council/Auckland Transport and vested in the Council. Protection of the arterial routes proposed through Redhills is not required to serve local demand, but long-term future regional demand from Kumeu/Huapai and Riverhead.</p>	Invest in existing network improvements for Fred Taylor Drive and Don buck Road that will immediately support growth in Redhills as a prioritised area over the RLTP's 10-year horizon.
8.				<p>In the case of Redhills, the Supporting Growth Programme may have identified the preferred network, but it does not enable the sequencing of land release specified in the FULLS, nor will it improve access to places where people live and work over the next 10 years. This is because the proposed arterial routes in Redhills will lead nowhere (refer to submission point 1 above) in the next 10 years.</p> <p>Redhills directly adjoins Fred Taylor Drive/Don Buck Road urban arterials and is already connected to the rest of urban Auckland. The development of the proposed future arterial routes in Redhills, which are destined to stretch beyond the RLTP's 10-year horizon and are needed to supply regional demand estimated for 2046, does not support urban growth in this prioritised area.</p>	Fund the acquisition of land, for future route protection not development, to cover the difference between arterial and collector status for the proposed Redhills arterial routes.

UNIVERSAL HOMES LIMITED: Submission on Draft Auckland Regional Land Transport Plan (ARLTP)

d	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
9.			Support in part	<p>The HIF (additional funding) is not yet guaranteed. It is not clear in the draft ARLTP what the proposed \$275m for Greenfields Transport Infrastructure will cover. Nor is it clear what is covered by "new Redhills connection to urban arterial standard with appropriate public transport and active mode provision".</p> <p>It is also not clear what the Local Residential Growth Fund (LRGF) covers and how it will be applied.</p>	Provide more information and clarification with an opportunity for supplementary submissions to be made as needed.
10.		Corridor Improvements	Support in part	<p>Auckland arterial routes together with the State Highways, form the backbone of the road transport network. Benefits arise from the completion of gaps in the strategic road network.</p> <p>Add capacity to the outer parts of the network, including providing new corridors in greenfield growth areas, and improve connections to existing urban areas in order to improve the efficiency of existing urban corridors.</p>	Upgrade Fred Taylor Drive/Don Buck Road through ARLTP funding.
11.	08. Funding and Expenditure	Funding Sources	Oppose in part	The HIF is not guaranteed and will only assist the Council to invest in future arterial routes for which there will be no demand during the RLTP's 10-year horizon. This fund does not support growth or increase housing supply in Redhills as housing development can be served by collector roads as and when developed and vested in the Council as part of the subdivision process.	Upgrade Fred Taylor Drive/Don Buck Road Through ARLTP funding.
12.		Funding Assumptions	Oppose in part	GPS 2018 is currently a draft document for public consultation. The Transport Agency's commitment to being responsible for funding rapid transit projects is not guaranteed.	Update ARLTP as soon as additional funding sources have been confirmed and provide opportunity for supplementary submissions on priority projects.

UNIVERSAL HOMES LIMITED: Submission on Draft Auckland Regional Land Transport Plan (ARLTP)

d	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
13.		AT Operating Revenue and Expenditure	Oppose in part	RFT currently remains a proposal.	Update ARLTP as soon as additional funding sources have been confirmed and provide opportunity for supplementary submissions on priority projects.
14.		AT Capital Revenue and Expenditure	Oppose in part	<p>RFT, HIF, National Land Transport Fund (NLTF) and Crown Infrastructure Partners funding are not guaranteed or certain.</p> <p>It is not clear what the LRGF covers and how it is applied.</p> <p>Work to profile AT's capital programme over the 10 year period is not complete.</p> <p>Projects to be carried forward from 2017/2018 and other associated budgets are not yet available.</p>	Update ARLTP as soon as additional funding sources have been confirmed and provide opportunity for supplementary submissions on priority projects.
15.	Appendix 1 Table 1A	Committed Projects and Programmes	Support	Investigation for Growth projects to facilitate investigation for high priority project in growth areas	Retain committed project for priority growth areas
16.	Appendix 1 Table 1A	Funds for Local Board priorities and to support housing growth	Support in part	<p>Greenfield transport infrastructure projects:</p> <p>It is unclear what is covered by \$275m proposed to support high priority greenfield areas, including existing corridor on Trig Road and new Redhills connection to urban arterial standard with appropriate public transport and active mode provisions.</p> <p>It is not clear what the LRGF covers and how it is applied.</p> <p>It is unclear how New Footpaths Regional, Urban Cycleways, Walking & Cycling and Whole of Route Bus Priority Phase 1 Programmes' funding are allocated.</p>	<p>Provide details of projects and who pays for what and when.</p> <p>Fund:</p> <ul style="list-style-type: none"> i. Acquisition of land, for future route protection not development, to cover the difference between arterial and collector status for the proposed Redhills arterial routes; and ii. upgrade of Fred Taylor Drive/Don Buck Road through ARLTP.

UNIVERAL HOMES LIMITED: Submission on Draft Auckland Regional Land Transport Plan (ARLTP)

d	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
17.	Appendix 1 Table 1B		Support in part	<p>Supporting Growth North West:</p> <p><u>Northside Drive East</u> – to go through Redhills, Northside Drive extension must go westward not eastward in the next 10 years. The absence of funding for Northside Drive <u>West</u> is supported as the proposed route is in the direction of Future Urban zone land, which is programmed for development from years 11-30.</p> <p><u>Redhills Fred Taylor Stage 2</u> – being a priority growth area, to support its growth and housing delivery, Redhills must be funded within the next 10 years.</p> <p><u>Redhills Network Coatesville-Riverhead Highway</u> - Delivery of a new Redhills north-south arterial (between Coatesville Riverhead Highway and Royal Road) and four east-west arterials are not priorities to support growth in Redhills over the next 10 years.</p> <p><u>Westgate Interchange</u> - \$18m for delivery of an operational bus interchange at Westgate consisting of 8 local bus stops with shelters and 10 layover spaces. The specification for this project needs to factor in the proposed light rail initiative.</p>	<p>Leave Northside Drive West unfunded until the next 10-year ARTLP is prepared.</p> <p>Confirm what Fred Taylor Stage 1 includes. Fund upgrade of Fred Taylor Drive/Don Buck Road.</p> <p>Fund the acquisition of land, for future route protection not development, to cover the difference between arterial and collector status for the proposed Redhills arterial routes.</p>

UNIVERAL HOMES LIMITED: Submission on Draft Auckland Regional Land Transport Plan (ARLTP)

d	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
18.	Appendix 2 - New Zealand Transport Agency Investment Programme		Support	It is expected that these projects will reduce traffic congestion and thereby support growth in Redhills as a priority area.	<p>Committed: \$26m for Completion of Western Ring Route including SH16 widening from Lincoln Road to Westgate</p> <p>Rapid Transit initiatives identified in ATAP: \$1,800m for Light rail - North West Corridor Supported.</p> <p>Corridor Improvements: \$20m for Supporting Growth Alliance - route protection for the preferred network in the North west growth area, including looking at specific NZTA activities such as alternative corridors to existing SH16. Project details to be clarified.</p> <p>Fund the acquisition of land, for future route protection not development, to cover the difference between arterial and collector status for the proposed Redhills arterial routes.</p>

■ **Annexure 3**

RFT Submission points



UNIVERSAL HOMES LIMITED: Submission on Auckland Regional Fuel Tax (RFT)

	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested	
1.	Introduction		Support in part	<p>Existing funding tools constrain the ability to deliver the key outcomes, focus areas and a package of projects to achieve the Auckland Transport Alignment Project (ATAP).</p> <p>The Regional Fuel Tax (RFT) is subject to the enactment of the Land Transport Management (Regional Fuel tax) Amendment Bill.</p>	Update RFT programme list as soon as RFT for Auckland has been confirmed and open for further consultation on priority projects.	
2.	Proposed transport programme	Proposed transport programme	Oppose in part	<p>Increase capacity and use of the existing public transport network, with particular focus on the northwest high growth area. It is unclear why the northwest priority growth area is currently omitted.</p> <p>Redhills is a key growth area requiring transport infrastructure in the form of upgrades to Fred Taylor Drive and Don Buck Road to support housing delivery.</p>	Include priority high growth areas in the Northwest to fund upgrades to Fred Taylor Drive and Don Buck Road.	
3.				<p>Final detailed information is not available, the cost and timing of projects are not confirmed and the Housing Infrastructure Fund (HIF) is not guaranteed.</p>		Update RFT programme list as soon as RFT and Regional Land transport Plan (RLTP) for Auckland has been confirmed and open for further consultation on priority projects.
4.				Strategic Alignment		

UNIVERSAL HOMES LIMITED: Submission on Auckland Regional Fuel Tax (RFT)

	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
				The RLTP is not finalised, but RFT will enable otherwise unfunded ATAP priorities including supporting Redhills priority growth area.	
5.	Why a Regional Fuel tax should be a funding source		Support in part	The Council cannot provide the funding required for a number of high priority transport projects that are subsidised by New Zealand Transport Agency (NZTA) and development contribution funding. If Council received development contributions the projects funded by it have to be delivered within the next 10 years or refunded, thereby potentially creating underdeveloped new urban areas.	Update RFT programme list as soon as RFT and RLTP for Auckland has been confirmed and open for further consultation on priority projects.
6.				In the case of Redhills, housing delivery will be hampered if the existing Fred Taylor Drive and Don Buck Road arterials are not upgraded to accommodate the demand created by areas like Kumeu and Riverhead. It is fair for transport users to pay for additional transport investment according to the amount they travel rather than every ratepayer.	Apply RFT funding to the existing Northwestern arterial network (Fred Taylor Drive and Don Buck Road) to support housing delivery in the Redhills priority growth area.
7.	Projects	Project 1: Bus Priority Improvements	Oppose in part	Increasing bus patronage will assist in reducing congestion, and the impacts resulting from congestion, and will lead to greater utilisation and productivity of arterial corridors. A key component of the new bus network is the delivery of the Frequent Service Network (FSN). The Western Interchange and Westgate Park and Ride are key links to support the proposed Northwestern light rail Rapid Transit Improvement.	Apply RFT funding to the existing Northwestern arterial network to support housing delivery in the Redhills priority growth area.

UNIVERAL HOMES LIMITED: Submission on Auckland Regional Fuel Tax (RFT)

	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
8.		Project 5: Park and Rides	Support in part	<p>Investment in new park and ride facilities will maximise access to the Rapid Transit Network and Frequent Transit Network.</p> <p>Specific location and timing of improved Park and Ride facilities are subject of future business cases and thus not confirmed.</p> <p>Westgate Park and Ride facility will more cost effectively provide access to public transport for a significant number of commuters in the Northwest.</p>	Confirm and fund Northwest – Westgate as a new Park and Ride facility to support a priority growth area and to optimise existing state highway and arterial network.
9.		Project 8: Road Safety	Support in part	<p>Speed management and safe walking facilities in town centres, neighbourhoods and schools are central to improving road safety as are improvements to high speed, high-risk rural roads.</p> <p>Fred Taylor Drive, formerly SH16, and its roundabout at Don Buck Road needs to be urbanised and upgraded to allow safe pedestrian and cycling access from Redhills to the Westgate/Massey North Metropolitan Centre with a matching low speed 50km/h limit.</p>	Apply RFT funding to invest in existing network improvements for Fred Taylor Drive and Don Buck Road arterial that will immediately support growth in Redhills as a prioritised area over the RLTP's 10-year horizon.
10.		Project 9: Active Transport	Oppose in part	<p>Focus on supporting short trips to the Westgate Public Transport Interchange and Westgate Metropolitan Centre. The lack of connectivity in the Northwestern network means that cycling does not currently play the significant role it could.</p>	Apply RFT funding to invest in Urban Cycleways for Fred Taylor Drive and Don Buck Road that will immediately support growth in Redhills as a prioritised area over the RLTP's 10-year horizon.

UNIVERSAL HOMES LIMITED: Submission on Auckland Regional Fuel Tax (RFT)

	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
11.		Project 12: Road Corridor Improvements	Oppose in part	The initiative to improve capacity, safety, amenity and connectivity of the existing road corridors needs to include Fred Taylor Drive and Don Buck Road arterials. This investment will leverage the existing public investments in road infrastructure and provide value for money by addressing capacity constraints and improving safety and connectivity	Apply RFT funding to invest in existing network improvements for Fred Taylor Drive and Don Buck Road that will immediately support growth in Redhills as a prioritised area over the RLTP's 10-year horizon.
12.		Project 13: Network Capacity and performance Improvements	Support in part	Manage congestion in the Northwest more effectively through capital investments to make better and more appropriate use of the existing Fred Taylor Drive and Don Buck Road arterial network. This investment will have the advantage that, because it leverages off existing investment, it will achieve improvements more quickly than some other projects like the future arterials in the Redhills Precinct.	Apply RFT funding to invest in existing network improvements for Fred Taylor Drive and Don Buck Road that will immediately support growth in Redhills as a prioritised area over the RLTP's 10-year horizon.
13.		Project 14: Growth related transport infrastructure	Support in part	<p>Redhills, is one of the highest priority growth projects and has a live urban zoning. It requires funding for the upgrade of the existing Fred Taylor Drive and Don Buck Road arterials to progress over the next ten years as it is currently unfunded in the ARLTP. This funding will also support the NZTA upgrade of SH16 between Kumeu and SH18.</p> <p>The HIF is not guaranteed and does not cover Fred Taylor Drive or Don Buck Road upgrades. The HIF is proposed to fund future arterials within the Redhills Precinct that are not required within the RLTP's 10-year horizon and are not required to service the local demand.</p>	Apply RFT funding to invest in existing network improvements for Fred Taylor Drive and Don Buck Road that will immediately support growth in Redhills as a prioritised area over the RLTP's 10-year horizon.

UNIVERSAL HOMES LIMITED: Submission on Auckland Regional Fuel Tax (RFT)

	Section	Proposal	Support/ Oppose	Reasons	Funding Decision Requested
14.	Proposed Regional Fuel tax scheme and application of revenue		Support in part	Implementation is subject to the enactment of the Land Transport Management (Regional Fuel tax) Amendment Bill and the 1 July 2018 implementation date may be overly optimistic.	Update RFT programme list as soon as RFT and RLTP for Auckland has been confirmed and open for further consultation on priority projects.

OFFICE OF THE VICE-CHANCELLOR

Amy Malcolm
Manager, Strategic Relations

14 May 2018

Mayor Goff
Auckland Council



Vice-Chancellor's Suite
The Clock Tower, Level 2
Telephone: +64 9 923 4909

Email: a.malcolm@auckland.ac.nz

The University of Auckland
Private Bag 92019
Auckland, New Zealand

By email: akhaveyoursay@aucklandcouncil.govt.nz

Dear Mayor

University of Auckland Feedback on the Draft Auckland Regional Land Transport Plan 2018 - 2028

Thank you for the opportunity to provide feedback on the Draft Auckland Regional Land Transport Plan. The University of Auckland and AUT have collaborated in preparing this submission as key stakeholders in the Learning Quarter.

General Comments

The University of Auckland and AUT are generally supportive of the Draft Auckland Regional Land Transport Plan 2018 – 2028 and its focus on safety and access followed by environment and value for money.

All four strategic priorities (safety, access, environment and value for money) are important to our university communities. Collectively we attract some 62,000 students and 8,000 staff into the city from all over Auckland, and further afield. Our students and staff are active public transport users. Numbers of students living in the city and able to walk to campus (currently around 15% of students) are also growing as we develop more student accommodation in the city centre. Affordability, while not as critical as say, safety or access, is still very important to the student body whose ability to earn money is restricted during their time of study. Even if students live in the city centre they still need to travel around the city and to the wider Auckland region to meet their other commitments.

Learning Quarter Priorities

- Better connectivity of the Grafton Gully cycle way and upper Symonds Street.
- Safe, well-lit connections between the Domain Train Station and the City, Grafton and Khyber Pass Campuses.
- A holistic approach to Princes Street and Alfred Street improvements.
- The widening of the Grafton Road footpath outside the Business School to increase pedestrian safety.
- Issues already expressed to Auckland Transport through the Learning Quarter meetings and meetings with the Chief Executives at Auckland Council around changes to bus routes that service our university stakeholders.
- Symonds Street road safety project.
- St Paul Street upgrade including traffic calming measures.
- Mount Street safety improvements including traffic calming measures.
- Wellesley Street pedestrian over bridge upgrade to improve pedestrian and cycle access between AUT campus, Albert Park and Wellesley Street.

These priorities all address issues around safety and access.

Some relevant features about the University of Auckland and AUT:

A large highly educated population

- The University of Auckland has nearly 42,000 students and over 5,000 staff.
- AUT has 20,000 students and 3,000 staff on the City campus.

Internationally networked

- The University of Auckland has close to 7,000 international students from over 110 countries and has strong international networks including international affiliations and formal agreements with 174 universities in 40 countries.
- AUT has close to 4,700 international students from 97 countries.

Significant economic contributor

- The University of Auckland has a capital investment of \$2.9 billion in assets and an annual capital investment of \$139m. More than 12,000 staff and postgraduate students are involved in research, generating more than \$200m in annual research revenue. Auckland Uniservices Ltd. has 1200 active projects with more than 300 firms at any one time. In 2016 it created over 50 licences for intellectual property, 11 businesses to commercialise the University's research and generated more than \$114m.
- AUT has a capital investment of \$1 billion in assets and planned capital expenditure of \$250 million from 2019 – 2021 and \$400 million from 2022 – 2025.

Guardian of unique public buildings

- The University of Auckland looks after a number of historically and architecturally significant public buildings including Old Government House, Old Choral Hall, Alfred Nathan House, the Clock Tower, the Fale and Waipapa Marae.
- AUT has one heritage listed building, Te Ara Poutama Building on Wellesley St East. Other buildings significant to the city and the community are Nga Wai o Horitiu Marae and the Sir Paul Reeves Building.

We look forward to seeing the aspirations of the Draft Auckland Regional Land Transport Plan 2018 – 2028 realised and to working with Auckland Transport and Auckland Council as key stakeholders in the Learning Quarter.

Yours sincerely



Amy Malcolm

Manager, Strategic Relations
Office of the Vice-Chancellor
The University of Auckland



Suzanne Webb

Director Stakeholder Relations
Auckland University of Technology

File No: 21 20 84C
Document No: 12437585

10 May 2018

AK Have Your Say
Auckland Council
Freepost Authority 182382
Private Bag 92 300
Auckland 1142

401 Grey Street
Hamilton East
Hamilton 3216

Private Bag 3038
Waikato Mail Centre
Hamilton 3240

ph +64 7 859 0999
fax +64 7 859 0998
www.waikatoregion.govt.nz

Dear AK Have Your Say Team

Submission from the Waikato Regional Transport Committee on the Draft Auckland Regional Land Transport Plan 2018-2028

The Waikato Regional Transport Committee¹ would like to commend Auckland Council and Auckland Transport for producing a high quality draft 2018-2028 Regional Land Transport Plan (RLTP). We would also like to recognise the strong support you have given us through the submission that Auckland Council has made to the Waikato RLTP, dated 9 April 2018 which will be considered by our Hearings Committee at deliberations on 25 May.

In particular we appreciate the support of Auckland Council for closer collaboration between the councils in the Waikato region and Auckland Council to manage and respond to a range of inter-regional issues, including transport. We also appreciate your support for working towards a shared view about the movement of people of goods on our inter-regionally significant road and rail corridors. This includes managing passenger travel and freight on a limited rail network, and understanding how we can better manage a labour market that crosses regional boundaries.

Submission

The Waikato Regional Transport Committee makes the following submission in support of our shared inter-regional priorities for our strategic corridors and to ensure our two regional land transport plans are aligned with consistent policy messages.

Our submission is presented in two parts: high level comments are provided below followed by more specific submission points on certain components of your RLTP.

High level comments

We provide overall support for your draft 2018-2028 RLTP, recognising the importance of the Auckland Transport Alignment Project (ATAP) package of work which forms an important part of the investment in Auckland's transport system over the next decade. We note a number of these ATAP projects will provide benefits to the whole upper North Island transport system.

¹ Comprising membership of Waikato Regional Council, the 10 territorial authorities in the region, NZ Transport Agency and NZ Police.

We support the process that you have gone through to arrive at a document which is broadly consistent with the Waikato region's draft RLTP. In particular, we share a priority focus on ensuring the economic efficiency of our strategic corridors and on improving road safety outcomes.

Specific Comments

Chapter 6 Inter-regional priorities:

We support the references in Chapter 6 of your RLTP in respect to inter-regional priorities including inter-regional connectivity and inter-regional rail services. We support the focus on:

- Ensuring strong strategic connections between Drury and Tauranga via the Waikato region
- Upgrading the rail network to provide greater capacity for freight and passenger movement into and out of the Auckland region
- Addressing the challenges of growth not only in Auckland, but also in Hamilton and Tauranga.

We particularly support the reference to the provisions of interregional rail services in your RLTP in response to growth pressures in Auckland and the Upper North Island. We note the RLTP states that investment in the Auckland rail network to meet forecast growth in metro and freight services is a pre-requisite for the provision of comprehensive inter-regional services.

We have appreciated the involvement of Deputy Mayor Bill Cashmore and Councillor Chris Darby and officers of Auckland Council and Auckland Transport on the Hamilton to Auckland Transport Connections Working Group and the strong support given to the Strategic Business Case prepared by this working group.

Inter-regional passenger rail

We note in the Auckland Council submission on our RLTP your support for working with the Waikato Regional Council and other local stakeholders on progressing central government plans to promote connectivity, urban regeneration and integrated planning between our two regions. In particular, we welcome your support for the investigation into improved inter-regional passenger rail services led by councils in the Waikato, with involvement from Auckland Council and Auckland Transport. A fast, frequent passenger service between Auckland and cities and towns to the south would contribute to a number of Auckland Plan outcomes.

We acknowledge that your draft RLTP has picked up on the Government's signals for future inter-regional passenger rail, including the desire to see a future inter-regional passenger rail service linking Auckland, Hamilton and Tauranga (section 6).

Project planning for an inter-regional passenger rail service between Hamilton and Auckland is moving rapidly in the Waikato region. Hamilton City Council, with the support of Waikato Regional Council, is leading a project to implement an interim inter-regional passenger rail service between Hamilton and Auckland. Hamilton City Council has already secured land for a rail platform and park and ride facility in the north of the city and Waikato Regional Council is currently consulting through the Long Term Plan on whether the community would support an inter-regional passenger rail service (subject to significant central government funding commitment).

The Minister of Transport has confirmed the intention to progress this work as a matter of priority. This work is also being supported by the wider Hamilton to Auckland Transport Connections Strategic Business Case. In addition a Detailed Business Case is being prepared on a start-up passenger rail service.

The Waikato Regional Transport Committee **supports** the inclusion of the Hamilton to Auckland passenger rail service as an inter-regional priority in Section 6 of the Auckland RLTP.

Projects

Appendix 1 Table 1A – Funded Capital Programme

We **support** the following funded project in Appendix 1, Table 1A:

- Mill Road Corridor (Phase 1) providing additional strategic North-South corridor for South Auckland.

Appendix 2 Table – NZTA Investment Programme

We **support** the following project in Appendix 2:

- Southern Corridor Improvements – provision of additional motorway lanes

Appendix 3 KiwiRail Group – Funded Programme

We **support** the following funded KiwiRail projects in Appendix 3:

- Electrification of the NIMT between Pukekohe to Papakura
- Wiri to Quay Park (Completion of 3rd main line between Westfield and Wiri and Westfield Junction).

Appendix 3 KiwiRail Group – Additional Items – currently unfunded

We **support** the following unfunded KiwiRail projects in Appendix 3:

- Southern Rail Line Upgrade for regional services /express services
 - Creation of a third track between Wiri and Papakura, and between Papakura and Pukekohe.
 - Creation of a 4th track between Westfield and Wiri and between Wiri and Papakura

The Waikato Regional Transport Committee is **seeking Auckland Council and Auckland Transport ongoing support** of the interim Hamilton to Auckland inter-regional passenger rail service.

We **submit seeking** that Auckland Council and Auckland Transport bring a new project into your tables in the appendices to recognise the Hamilton to Auckland passenger rail service as a project for the Auckland region. Whilst no funding is sought from Auckland Council or Auckland Transport it is still important that the project is included in your RLTP to ensure funding is obtained through the National Land Transport Fund.

Conclusion

Thank you for the opportunity to submit on your draft Auckland Regional Land Transport Plan 2018 -2028.

We believe the amendments we are proposing in this submission will strengthen our common policy position and base for combined advocacy on transport matters of inter-regional significance to our two regions and the upper North Island as well as help secure the necessary investment of vital importance to inter-regional transport infrastructure and services.

We **do not wish** to be heard at your hearing to endorse and support the inter-regional components of your draft RLTP.

Yours faithfully

Councillor Hugh Vercoe
Chair of Waikato Regional Transport Committee



PO Box 15-668, New Lynn, Auckland 0640

John Edgar ONZM
President WRPS
PO Box 15668
Auckland 0640

president@waitakereranges.org.nz

14 May 2018

Auckland Council

Draft Proposal for a Regional Fuel Tax and Draft Regional Land Transport Plan

I am writing on behalf of the Waitakere Ranges Protection Society (WRPS) to submit on the Draft Proposal for a Regional Fuel Tax and Draft Regional Land Transport Plan (Consultation Document).

Background on the WRPS

The WRPS was incorporated in 1973. Its purpose is the conservation and protection of the Waitakere Ranges and to oppose any activity that may threaten or adversely affect the natural environment in the area, including the coastal and marine environment.

WRPS and its members are strong advocates for the conservation and protection of the natural environment of the Waitakere Ranges and WRPS was one of the key groups promoting the concept of the Waitakere Ranges Heritage Area (WRHA) for 35 years before it was achieved through an Act of Parliament in 2008.

WRPS has had significant involvement over the past 40 years with respect to reviews of and changes to the various relevant District and Regional Plans, especially the Waitakere City District Plan, the formation of various structure plans and the resolution of planning consent applications under the Town and Country Planning Act and resource consent applications

under the Resource Management Act, both at the Council level and on appeal to the Environment Court.

Introduction

The WRHA is of local, regional and national significance due to its unique heritage features which include the prominent indigenous character of its terrestrial and aquatic ecosystems, the opportunities that the area provides for wilderness experiences, recreation, and relaxation in close proximity to metropolitan Auckland, and its distinctive local communities.

The WRHA is also unique because of the population it services; New Zealand's largest metropolitan area with a relatively low proportion of accessible natural/non-built environments. This recreational resource is therefore of significant and increasing value to this population. It constitutes an essential public amenity for an increasingly urbanised population.

Auckland's growing population in turn means mounting environmental pressures and challenges for the WRHA. During day-to-day life, we see how easily human activity can encroach on animal and plant habitats. This is especially true in the WRHA where Kauri dieback and the spread of pests and weeds pose a serious threat to the forest. As a desirable area for a large number of visitors we need to be conscious of the impact on the environment. Auckland Council needs to prioritise minimising the impacts of visitors, particularly those who use private cars for transport, on the environment and local communities.

Submission

The WRPS compliments Auckland Council on their progress to date to address transport issues in the Auckland region. WRPS recognises the significant benefits this progress has brought to the region, particularly in helping to shift to public transport use for many commuters. The upgrade to electric trains and more regular train and bus services has made a substantial difference to the communities in the WRHA.

We also recognise however that transport is an ongoing concern in Auckland and particularly as Auckland continues to grow. WRPS therefore supports the Proposed Transport Programme and particularly the key objective to reduce the transport system's environmental impacts by improving the attractiveness, reliability and safety of more sustainable travel options. WRPS also supports a Regional Fuel Tax as we recognise that current funding is not enough to deliver the level of investment needed in Auckland's transport.

However, many people who live the WRHA do not have the option to use public transport. Of concern to WRPS is that the Proposed Transport Programme only addresses increasing the capacity of **existing** public transport networks. The programme also proposes to support key growth areas by providing transport infrastructure. Public transport to many parts of WRHA does not currently exist, and the WRHA is also not considered a key growth area, therefore will not be covered by these proposals. The WRHA needs support as currently it is suffering effects from population rise and visitor growth. We want Auckland Council to prioritise improvements to public transport in the WRHA, as well as local walking and cycling networks

as this will help to encourage people to use these more environmental friendly methods of transport, will result in less cars on the road and in the coastal communities, and will mean people living in the WRHA will reap more benefits of the Regional Fuel Tax.

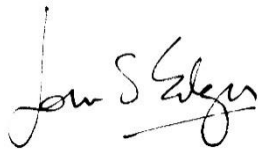
The provision of public transport service to popular sites such as Piha, Arataki, Wainamu, Te Henga and Karekare – would negate the need to develop new car parks (carparking being one of the main impacts in the coastal communities) and would enable visitors without access to a car to visit more easily. Low impact small buses (to cope with the winding roads) during peak times should be considered and costed against the wear and tear on roads and the need to upgrade current car parking in future. Providing such transport would also play a role in directing visitors more easily to the sites better able to cope with large numbers and in protecting more sensitive locations. This is particularly important for Kauri dieback and while the forested area of the Waitakere Ranges is closed. For example, specific visitor bus services that went directly to the west coast beaches would help to steer people away from visiting the forested areas. Community response indicates that a public transport service is a desperate need for the WRHA and that such a service should be introduced at the earliest possible time.

As stated previously many people in the WRHA use train and buses to commute to work in the city. Carparking is however a concern at the West Auckland public transport stations. We therefore support the 'Park and Ride' and 'Electric Trains and Stabling'.

Road safety is a concern for the WRHA as visitor numbers to the area increases. We therefore support the 'Road Safety' project especially the measures to address high risk intersections, speed management, improved skid resistance and roadside barriers.

Road safety for walking and cycling is also a concern for the WRHA. We therefore support the 'Active Transport' project however seek that WRHA be considered as a focus area for the project. Many parks of the WRHA are without safe foot and cycle paths and with high driving speeds allowed it makes walking and cycling a safety concern.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Edgar', with a stylized flourish at the end.

John Edgar ONZM
President
Waitakere Ranges Protection Society



Waitemata Low Carbon Network

14 May 2018

Auckland Regional Transport Committee
C/O Auckland Council
Private Bag 92300
Auckland 1142

rltp@at.govt.nz

Copy to: Waitemata Local Board

waitematalocalboard@aucklandcouncil.govt.nz

Submission to Proposed Regional Fuel Tax and Draft Auckland Regional Land Transport Plan 2018-28

Introduction

The Waitemata Low Carbon Network (**WLCN**) welcomes the opportunity to make this submission to the draft Auckland Regional Land Transport Plan 2018-28.

The WLCN is a diverse community of residents, groups and businesses passionate about making low carbon living, working and playing part of the distinct identity of central Auckland.

An important point we wish to make at the outset is that the climate crisis is with us now. It is not something far off into the future.

C40 Fossil-Fuel-Free Street Declaration

At the Together4Climate event in 2017, Mayor Phil Goff signed the C40 Fossil-Fuel-Free Street Declaration. That included a pledge for Auckland to procure only zero emission buses from 2025 and ensure a major area of Auckland has zero emissions by 2030. Mayor Goff also pledged to:

- have people friendly planning policies,
- increase the rates of walking, cycling and use of public and shared transport
- reduce the number of polluting vehicles and transition away from vehicles powered by fossil fuels
- procure only zero emission vehicles for council fleets
- collaborate with suppliers and fleet operators to shift to zero emissions vehicles and reduce vehicle miles

Climate Change and the Draft Auckland Regional Land Transport Plan 2018-28

We acknowledge that the draft Auckland Regional Land Transport Plan 2018-28 (RLTP) has identified climate change as an important issue.

The RLTP says that transport is Auckland's largest contributor to greenhouse gas emissions at 40 per cent, which is much higher than the 18 per cent national average, the majority of which comes from road transport. This in turn contributes to the global challenge of climate change. Reducing greenhouse gas emissions from the transport system is fundamental to meeting regional, national and international commitments to mitigate the impact of climate change. Addressing greenhouse gas targets represents a significant challenge and opportunity with the growth anticipated within Auckland. The RLTP says that the Government will be undertaking engagement on the Zero Carbon Bill in 2018 and Auckland Council will also be updating Low Carbon Auckland in 2018.

The RLTP also acknowledges the National Energy and Conservation Strategy with its goal to guide and promote an energy productive and low emissions economy, including the target concerning efficient and low emissions transport for electric vehicles to make up two per cent of the vehicle fleet by the end of 2021.

The RLTP also states that many of the activities included in it, such as the CRL, replacing diesel trains with electric units, and investment in walking and cycling will contribute to reducing greenhouse gas emissions and environmental harm. The proposed transport programme also includes:

- Rollout of LED street lighting across the Auckland region to reduce energy use
- Tamaki Drive resilience – investigation to determine how to address the impacts of sea level rise
- Investigating how to reduce emissions from marine transport including ferries
- Facilitating the increased uptake of electric vehicles, including enabling the private sector to invest in and expand charging infrastructure.

While we welcome these initiatives, we note that they do not entirely meet the C40 Fossil-Fuel-Free Street Declaration nor the existing Transport Pathway of the Low Carbon Auckland Auckland's Energy Resilience and Low Carbon Action Plan. These are included in Appendix 1. As a consequence:

The WLCN asks that the C40 Fossil-Fuel-Free Street Declaration and the existing Transport Pathway of the Auckland Low Carbon Plan (as set out in Appendix 1) be fully reflected and referred to in the key strategies, projects and programmes of the Auckland Regional Land Transport Plan 2018-28.

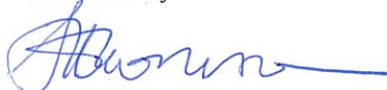
Further, the WLCN requests that investment in low carbon transport infrastructure be prioritised in the RLTP, including:

- **Introduction of bike racks on buses to allow greater intermodal travel (Australia, US and Canada all have these. Buses with bike racks have also been introduced for several routes in the Waikato region);**
- **Planning to ensure greater use of cycling, electric vehicles, rail, and the proposed light rail, to reduce demand for freight distribution in congested areas of the inner city;**

- More detailed consideration and planning for climate change impacts, including sea level rise, on transport infrastructure ensuring these are factored into regional transport investment decisions;
- An increase in the amount of car free shared areas within the inner city;
- Greater provision for electric vehicle charging within the city;
- Regulations/training to ensure that internal combustion engine buses and delivery vehicles are not left idling between stops or during deliveries and/or are excluded from specific “problem” areas to improve air quality (this is frequently occurring in highly populated areas in the inner city where large numbers of pedestrians are walking and many people are dining);
- No detailed data is provided in relation to future development areas addressing how these are able to be serviced by zero or low carbon transport options. The network requests that data be provided demonstrating that the growth in capacity planned for Auckland’s sustainable transport infrastructure is both proportionate and timed to increase in advance of planned population growth within those areas of development - as well as meeting the overall trend to increased use.
- Provisions to enable greater use and accessibility of share electric vehicles within the city and distributed throughout the suburbs to ensure that the reliance on high levels of car ownership by residents and businesses is able to be reduced
- Enabling greater access to and uptake of electric bikes within the city to extend the range of daily cycle commutes possible
- Ensure that cycle and pedestrian safety is integrated into the consideration of all road safety initiatives and roading upgrades
- Ensure design which prioritises the flow of pedestrians, cyclists, share vehicles and electric or cycle powered freight distribution within the central city
- Review the design of road stormwater infrastructure to ensure that plastic waste and litter entering Auckland’s streams and harbours is avoided
- Ensure that the full \$635m cycling programme business case is funded¹ prioritising the interconnection of cycle paths within the Waitemata Local Board area

If you have any questions or would like to discuss this further, please feel free to contact us.

Your sincerely



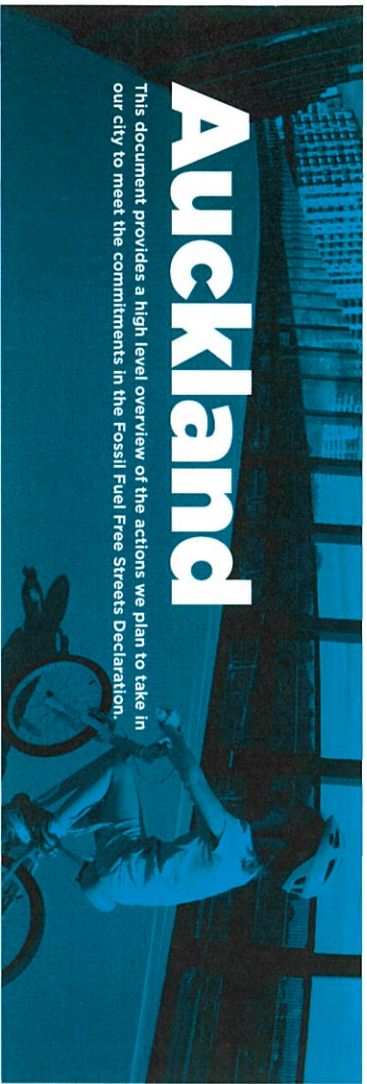
Waitemata Low Carbon Network (Members)
Sarah Lorraine Thomson

¹ Greater Auckland <https://www.greeterauckland.org.nz/2018/05/09/cyclings-missing-millions/>

Grant Hewison

sarahlorrainethomson@gmail.com

grant@granthewison.co.nz



Auckland

This document provides a high level overview of the actions we plan to take in our city to meet the commitments in the Fossil Fuel Free Streets Declaration.

FOSSIL-FUEL-FREE STREETS COMMITMENT

ACTION

Procure, with our partners, only zero emission buses from 2025.

Complete the Auckland Transport Low Emissions Roadmap for buses. In 2018 trial two electric buses, jointly funded by key partner, the Energy Efficiency and Conservation Authority

Ensure that a major area of our city is zero emission by 2030.

Focusing on the Auckland city centre, which is that part of Auckland that is located within the urban motorway system and the Waitemata harbour edge, we will:

- Complete the City Rail Link which will increase rail capacity to the city centre by 150%
- Building on the success of shared spaces on Federal, Elliot, O'Connell, Fort Streets and Fort Lane, continue to adapt the public realm, and streets across the city centre to prioritize walking and cycling and disincentivize private vehicles
- Expand mass transit
- Investigate how to expand the existing bike share scheme
- Deploy innovative mechanisms such as the recently completed business case for walking to continue to make the economic case for pedestrianisation
- Build on the successful programme of activation which has seen the community reclaim car spaces for community activity including Griffiths Garden and Pocket Parks

OTHER SUPPORTIVE ACTIONS

Transform our cities through people-friendly planning policies.

The Auckland Unitary Plan encourages intensification around key public transport corridors and delivery of this will continue to be monitored

Increase the rates of walking, cycling and the use of public and shared transport that is accessible to all citizens.

Improvements across the public transport network. The past four years has seen the introduction of AT HOP smart card, electric trains, double decker buses, simpler fares, more services and new stations and there are more improvements on the way.

Reduce the number of polluting vehicles on our streets and begin the transition away from vehicles powered by fossil fuels.

With a focus on transitioning people to walking, cycling and public transport, a Smarter Transport Pricing project is underway to determine the most effective financial mechanisms to support the shift

Lead by example by procuring zero emission vehicles for our city fleets as quickly as possible.

Auckland Transport has committed to a fleet of all electric vehicles from 2025, with the first 20 electric vehicles arriving early 2018.

Auckland Council has committed to 5% of the fleet being electric vehicles by 2020.

Collaborate with suppliers, fleet operators and businesses to accelerate the shift to zero emissions vehicles and reduce vehicle miles in our cities.

Through rail electrification, Auckland Council, Auckland Transport and Government reduced greenhouse gas emissions by 85% per passenger kilometre overall. Auckland Council have committed to electrification of the remaining diesel shuttle rail services from Papakura to Pukekohe.

Auckland Transport, as part of its Sustainability Framework, is developing a low emissions roadmap for buses, is engaging with bus operators, as well as trialling two electric buses in early 2018.

Continued delivery of the cycling programme including delivery of the 10-year cycle strategy, building on successes of separated facility development in the city centre, accessing city centre and local paths.

Watercare have committed to 30% of the fleet being electric vehicles by 2019

Thirty of New Zealand's leading businesses have already committed to converting 30% of their fleet to electric vehicles by the end of 2019. This is approximately 1450 vehicles.

An initial round of public sector and private sector suppliers are purchasing electric vehicles for fleets as part of the whole of government procurement scheme. The pilot procurement is led by NZ Government Procurement.

EXAMPLE OF FINANCIAL RESOURCES AVAILABLE TO DELIVER THE COMMITMENT

• Auckland Council and central government are investing \$3billion into the City Rail Link • Investing nearly \$40 million in the regional cycleway network this financial year • Auckland Council is currently developing the Long Term Plan which is the mechanism for allocating financial resources to deliver on the actions above • Auckland Council will also work with recently formed new government to attract investment to deliver on the actions above

**Low Carbon Auckland Auckland's Energy Resilience and Low Carbon Action Plan
Toitū te whenua, toitū te tangata (July 2014)**

Element 1: Reducing the demand for travel

	Delivery lead (in bold) and contributors	Completion date	Status
Action 1: Investigate and ensure alignment between transport investment and the outcomes sought by this action plan. (E)	Auckland Transport, Auckland Council, NZTA	2015	Started
Action 2: Update the Integrated Transport Programme to ensure it is consistent with this action plan, including a stronger travel demand management focus. (E)	Auckland Transport, NZTA	2015	Started
Action 3: Undertake detailed investigation into transport pricing tools with a travel demand management focus and reach an agreed way forward. (E)	Auckland Council	2015	Started
Action 4: The Auckland Unitary Plan enables intensification in areas with good access to public transport as well as encouraging walkable centres and communities. The Unitary Plan supports action on infrastructure improvements. Ensure land use zoning patterns support efficient transport networks, connectivity and reduced reliance on car travel. (E)	Auckland Council	2016	Started
Action 5: Remove minimum car parking requirements and reduce requirements for off-street parking. (D)	Auckland Council	2016	Started

Element 2: Increasing the use of public transport, walking and cycling

	Delivery lead (in bold) and contributors	Completion date	Status
Action 6: Ensure street design standards support walkability. (E)	Auckland Transport	2015	Started
Action 7: Implement new frequent bus network and electric trains that are supported by integrated ticketing and fares. (D)	Auckland Transport	2016	Planning started
Action 8: Ensure significant improvements to cycling infrastructure, particularly focusing on improving actual and perceived safety, including separated routes and traffic calmed streets. (D)	Auckland Transport Auckland Council, NZTA	2020	Planning started
Action 9: Achieve extensive improvements to bus priority measures, e.g. bus lanes, priority at traffic signals. (D)	Auckland Transport	2020	Planning started
Action 10: Complete key Auckland Plan first decade public transport projects, e.g. City Rail Link, busway improvements. (D)	Auckland Transport	By 2022	Planning started

Element 3: Improving transport efficiency to reduce the consumption of fuel

	Delivery lead (in bold) and contributors	Completion date	Status
Action 11: Deliver enhanced freight and bus driver training programmes and include performance monitoring. (D)	EECA	By 2015	New initiative
Action 12: Provide smart travel information via the web, roadside signage and GPS devices, to enable more efficient freight movement. (E)	Auckland Transport	By 2020	Started
Action 13: Co-ordinate an investigation into the shared use of freight hubs in key locations in and around Auckland. (E)	Auckland Council, Auckland Transport	By 2020	New initiative
Action 14: Advocate for continued improvements to emissions standards for new and imported vehicles. (E)	Auckland Council	Ongoing	Started

Element 4: Moving away from the use of fossil fuels

	Delivery lead (in bold) and contributors	Completion date	Status
Action 15: Undertake targeted trials of alternative fuels for vehicle fleet. (D)	Auckland Council	By 2015	Started

	Delivery lead (in bold) and contributors	Completion date	Status
Action 16: Start converting the public transport fleet to alternative fuels. (D)	Auckland Transport, public transport operators	By 2016	Started
Action 17: Undertake a public awareness campaign and facilitate discussion about the benefits of alternative fuels, taking into account any possible effects on air quality. (D)	Auckland Council	By 2018	New initiative
Action 18: Work with partners to develop an electric vehicle charging network. (E)	Auckland Council	By 2020	New initiative
Action 19: Undertake widespread conversion of public sector vehicle fleets to alternative fuels. (D)	Auckland Council, Government	By 2022	New initiative



Submission on Draft Regional Land Transport Plan May 2018

Submission from Andy Smith on behalf to Walk Auckland Inc and the Auckland branch of Living Streets Aotearoa.

Who is Walk Auckland

Walk Auckland is the pedestrian advocacy group

Registered Charity CC34550

Aim: To promote the rights of people to walk with independence, comfort and safety

Objectives:

- Ensure everyone has the right to –
- walk as the basic means of human movement, without restriction and fear
- expect that councils and other organisations that have responsibility to pedestrians to have clear development and maintenance standards for footpaths and walkways and apply them.
- To promote and advocate for-
- walking as a healthy, environmental-friendly and universal means of transport and recreation
- social and economic benefits of a pedestrian friendly community
- Liaison with local, national and international groups
- Input into decision making (building, parks, transport & roading, walkways, designs/strategies) at local and national transport levels
- clearly identified maintained and accessible footpaths & rights of way
- policing of traffic to enforce and educate drivers on pedestrian rights especially at crosswalks.
- campaigns, meetings and publications to further pedestrian rights.
- safe, pleasant, uninhibited, easy pedestrian access between key points such as their residence to all amenities, including parks, public transport, waterways workplace and other common destinations.

Top Priorities

- ! Bayswater Ferry Terminal upgrade
- ! Downtown Ferry Basin – increased capacity
- ! Ferry Strategy
- ! Lake Rd/Esmonde Rd improvements
- ! Sea level rise north of Harbour Bridge resilience improvements (NZTA project)
- ! Skypath (NZTA project)

- ! Seapath (NZTA project)
- ! Safer communities and speed management
- ! Integrated ticketing – improvements, replacement and national system
- ! Footpath maintenance and renewal

Introduction

Overall, We welcome the initiatives outlined in this draft Regional Land Transport Plan, and welcome the opportunity to highlight issues which we see as particular priorities for us and our community.

Comments in this submission follow the structure of the Draft RLTP document, highlighting issues important to me and my community.

Vision

The vision needs to be more clearly and boldly articulated in this opening section.

Support a vision of

“an accessible*, well connected, safe and sustainable city”, where it is easy to access employment and services; where it is safe to walk and cycle, and **drive only where an alternative mode is not feasible**; where there are **genuine travel choices for all, including disabled people**; and where the negative impacts of the transport system on people and the environment** are minimised.

Support the objectives of:

a move away from a city where single occupant vehicles are the dominant mode of travel to one **where public transport and walking and cycling are prioritised** in the transport system, and there is a major focus on **improving walking and cycling safety and a target of zero road transport deaths on Auckland roads**.

- ! Accessible should be defined as making the transport system useable and providing real choice for disabled people (people with cognitive, physical, psychological and sensory challenges or impairments).

** Minimising impact on the environment should include a target to reduce air pollution, greenhouse gas emissions and to protect estuaries, streams and Auckland’s bays and harbours from road run-off.

Addressing Auckland’s challenges

Strategic approach

Support this approach.

Walking, cycling and public transport should be prioritised modes, particularly in town centres

Walking, cycling and public transport infrastructure must provide genuine choice for people living in established suburbs and in new subdivisions at a distance from the city centre to travel for employment, study, recreational, social and cultural purposes.

Safety

Support Vision Zero approach (page 31).

Safety programme should prioritise:

- ! **Reducing the speed limit to 30km/h at all times** in town centres and around schools and retirement homes and villages
- ! **Improving road crossing infrastructure for pedestrians**, in particular replacing pedestrian refuges with table pedestrian crossings, or signalised crossings, reducing wait times at signalised crossings and increasing cross times for pedestrians crossing wide intersections
- ! **Separating walking and cycling** facilities as these two modes travel at different speeds
- ! **Providing wider footpaths or kerbside** berms in new subdivisions and when upgrading existing footpaths to accommodate the increased number of wheelie bins and larger mobility devices. **Mobility devices required by disabled people** to maintain mobility should be the only motorised wheeled devices permitted on footpaths

- ! The law prohibiting most cyclists from riding on the footpath should be enforced
- ! Removal of at grade rail/pedestrian crossings should be a priority.

Access

Support this approach

Ensuring accessibility of all transport modes for all disabled people must be prioritised in all new projects and when maintaining and upgrading existing transport infrastructure.

Public transport needs considerable improvement to meet the accessibility needs of all disabled users. Audible announcements for all buses are urgently needed and ferries need to be fully wheelchair accessible.

I support the Access Alliance's¹ campaign for an Accessibility for New Zealanders Act. We urge Auckland Transport and NZTA to ensure all infrastructure and services are developed in anticipation of such an act becoming law, to avoid the disruption and additional expense of retrofitting to meet the requirements of any such future law.

¹ Access Alliance: http://www.accessalliance.org.nz/the_accessibility_act

Rapid transport network

Support all priorities except light rail to airport. Extending existing rail network would provide a far better level of service for airport workers, visitors/tourists and local travellers. Light rail may serve Dominion Rd commuters well but is not well suited to servicing the airport as there is far less certainty of journey time on a light rail network shared with other road traffic.

Ferries

Support proposed programme for ferry infrastructure improvements, especially:

- ! Bayswater Ferry Terminal upgrade
- ! Devonport Ferry Terminal upgrade
- ! Ferry Strategy.
- ! Downtown Ferry basin upgrade

It is of concern and unsatisfactory that these projects are listed in Appendix 1B as unfunded projects.

The Future Ferry Strategy is urgently needed. This needs to address the poor quality of vessels and level of service provided by the current operator and resolve the issue of an integrated fare structure to provide AT Hop users with incentives to use bus-ferry-rail connections, and choose to use public transport at weekends.

The Bayswater Ferry terminal upgrade must be a priority project to complement Lake Road congestion reduction initiatives. While an accessible, fit for purpose terminal is required, service frequency particularly off peak and at weekends must be increased, bus connections provided to all services and an integrated fare structure as part of the upgrade package.

It is good to see a plan to develop the Downtown Ferry piers 3 and 4 at Queen's wharf and to continue seismic strengthening of the Quay Street seawall as part of an America's Cup project. However **the entire Downtown Ferry terminal is urgently need of an upgrade** and more ferry berths as the terminal is at capacity at peak times creating delays for many commuters. The waiting area still lacks effective shelter for waiting passengers.

Do not support the investigation of a Brown's Bay ferry service. Upgrades to existing ferry terminals and services must be prioritised over expansion of the ferry network. A Brown's Bay – Downtown route is unlikely to deliver significant journey time reduction benefits, and is likely to be an unreliable service frequently subject to adverse weather conditions due to the exposed outer harbour route and exposed beach terminal location at Brown's Bay.

Rail

Support rail transport programme

- ! Particularly support the progressive improvement and removal of road/rail level crossings to better manage safety risks and address road congestion, and to allow increased train speed. **Eliminating at grade pedestrian/rail crossings** should be prioritised.
- ! Investigation, design and route protection for a new rail route from Auckland International Airport to Botany via Manukau City Centre, including Puhinui should be prioritised over the proposed light rail to Airport link.

Walking

Support the strategies to increase walking.

There should be a dedicated walking programme with staff and funding separate from the cycling programme. Walking and cycling are different modes which travel at different speeds, and have different needs and aspirations. Some priorities such as slower speeds in town centres, around schools and retirement homes and villages will contribute to both safer walking and cycling. **Pedestrians need well maintained footpaths, safe road crossing points (not pedestrian refuges) and well-designed street spaces** where they feel safe, and which are well-lit, provide green space and shade, and free from all fast moving traffic, including cyclists travelling at speed.

Support proposed walking and cycling infrastructure programme, particularly:

- ! **Skypath and Seapath which should be delivered as an integrated package.** Environmental impacts of Seapath must be mitigated and the route developed in consultation with local environmental groups, such as Forest and Bird, to protect the unique ecology and bird habitat of Shoal Bay. This is essential walking and cycling infrastructure for people across Auckland and of particular benefit for the North Shore community, from Northcote, Takapuna and Devonport.
- ! **New footpaths regional programme - to construct new and widened footpaths.** This is essential to accommodate wheelie bins for rubbish collection and increased use of mobility devices. Mobility devices used by disabled people should be the only motorised wheeled devices permitted to share footpaths with pedestrians.

Additional project proposed:

- ! A walking / cycling link from Northboro Reserve to Sandy Bay Road, Bayswater (mostly on reserve land and less than 1km) should be developed to effectively link Seapath and the Hauraki catchment to the Bayswater and its ferry terminal. This is also an ecologically sensitive area but environmental impacts would be mitigated with the use of a boardwalk. This would be suited to adoption as a Devonport-Takapuna Local Board initiative.

Walking and cycling modes should be separated wherever possible. Where paths are shared pedestrians should have priority as the slower moving mode and cycle speed should be reduced through design features, signage and education.

City Centre

Support bus interchange upgrades. Bus interchanges urgently need to be rationalised. At present it is extremely difficult for anyone unfamiliar with the bus network and disabled people to find the correct bus stop or navigate between stops.

Interchanges should be focused on Customs and Lower Albert Streets to facilitate bus to ferry or rail connections. Once CRL is complete interchanges on Wellesley Street will also be useful. Seamless connections with inter-regional bus or rail services and transport to the Airport are also critical for people coming from north, east and west.

Airport

A rail link from the city to the Airport, integrated with the northern rapid network is urgently needed.

Visitors

A more coherent bus network, in particular city interchanges is urgently needed. Buses need to meet international accessibility standards, including audible and visual bus announcements on arrival at bus stops and on board to assist disabled passengers, and visitors to get on the right bus and alight at the correct stop.

Placemaking

Auckland Transport has an important role in placemaking. This is particularly important around public transport nodes, in town centres and where parks and reserves provide important active transport routes between arterial corridors. **More effort needs to be made to ensure placemaking projects meet the**

needs of pedestrians, disabled and older people. Seating, lighting and design which can be easily navigated by people with sensory and mobility impairments are particularly important elements of public spaces. Spaces free from all fast moving traffic (including bicycles) are valued by these population groups and all walkers. **More needs to be done to ensure there are green, traffic-free public spaces with trees in town centres.** Green space is important for mental and physical health, providing shade and quiet space, and to supports biodiversity in the city.

Technology

Support technology initiatives.

Technological solutions must be developed in consultation with disabled people, especially blind and vision impaired, and cognitively impaired people to ensure the technology can be used, and improves access for these groups.

Environment

Support these initiatives.

New transport initiatives must be subject to robust environmental assessment to ensure impacts on the natural environment and ecosystems, particularly in coastal areas are minimised and mitigated, and developed in consultation with groups advocating for protection of our natural environment.

Supporting growth

It should be recognised that established areas are also experiencing increased intensification. This particularly impacts on the Devonport peninsula – from Stanley Point to Esmonde Rd/Takapuna. Improved transport infrastructure and more frequent and reliable bus and ferry services need to precede new housing development. Weekend travel times are now particularly unpredictable on the Devonport peninsula impacting on everyone's employment, social and recreational activities.

Corridor improvements

Support:

- ! Lake Road, Devonport/Takapuna – improvements to Lake Road and Esmonde Road to improve journey time reliability.

This is the **number one priority** for Devonport peninsula communities, including Bayswater. Improvements are urgently needed before additional residential development takes place in the Devonport, Bayswater and Hauraki areas, as a result of Ng ti Wh tua land redevelopment, which will result in additional households needing access to education, employment and other social activities along the Lake Rd corridor.

These improvements must be in conjunction with upgraded Bayswater ferry terminal and more frequent bus and ferry services.

Support the NZTA project relating to sea level rise north of the Auckland Harbour Bridge.

- ! Implement interventions to increase the resilience of this portion to future storm tide inundations and sea level rise.

Both these projects also impact on the resilience of Devonport peninsula communities in the event of natural disasters.

Maintaining and renewing existing assets

Maintenance of footpaths must be prioritised to prevent slips, trips and falls. Kerbing and channelling at crossing points must be improved to remove water pooling at the very point where pedestrians wish to cross, and to improve access for those using prams, pushchairs, wheelchairs and other mobility devices.

Boardwalks and sea walls are also in critical need of maintenance on the Devonport peninsula. Sea walls supporting critical road infrastructure in Bayswater are at particular risk due to greater wave action due to sea level rise and increased adverse weather events.

Inter-regional priorities

Particularly support:

- ! Upgrading the rail network to provide greater capacity for freight and passenger movement into and out of the Auckland region to Tauranga and Hamilton

Rail upgrades for passenger and freight movements to Northland should also be prioritised.

Passenger rail access to Hamilton, Tauranga and Whangarei and other centres north of Auckland are much needed to reduce the need to drive these busy and unsafe roads. The travel distances to these centres from Auckland are well suited to train travel, and would greatly enhance the economic and tourist development of these regional centres.



14 May 2018

Bike Auckland Feedback on the RFT and RLTP

Regional Fuel Tax

Bike Auckland **supports the proposed Regional Fuel Tax** as a stop-gap measure which will fund an extra \$112m of walking and biking investment over the next ten years as part of a programme to expand travel options for Aucklanders across the city.

We are concerned that the fuel tax burden will adversely affect those on low incomes living some distance from metropolitan centres, and recommend both local and central government look at measures to mitigate this inequitable impact, including greater access to and frequency of public transport, improved cycling connections, and other support where appropriate.

Over time, we would also expect to see the use of Travel Demand Management techniques based on new technology, to more fairly apply road usage pricing based on location, time of day and vehicle occupancy.

Regional Land Transport Plan

Overarching comment

1. We strongly request that Auckland Transport's full **Cycling Programme Business Case be fully funded**. The ten-year programme lays the groundwork for a basic minimum cycle network, plus strategic investment in areas destined for housing development and population growth.

We are extremely concerned that this programme (estimated at \$635m over ten years) is only half-funded in the RLTP (\$338m) – and that the remainder is not even listed in the unfunded category. This means the basic network could take two full decades to complete, delaying the 'network effect' by a generation; and areas pegged for development will lag behind in safe bike infrastructure.

We are aware of added bike investment coming from NZTA and cycling infrastructure incorporated in other major projects. However, these sums generally sit outside the business case assumptions. As also identified by Greater Auckland in their submission, by not including the full cycling programme business case as a priority for additional funding, the RLTP thus appears to be fundamentally misaligned with ATAP.

Furthermore, by declining to fund the cycling programme in full, AT would be putting the brakes on cycling. In effect, this would be a public statement by AT that their own proposed cycling programme, which was developed with NZTA and approved by the AT board, is 'too much, too fast' and/or not a strategic priority for the city – at a time when bike [uptake is rising](#) and many of the original urban Cycleway Fund projects are on the verge of completion.

We would also note several pressing demographic factors that will soon make even the ten-year business case seem unambitious:

- **The growth of e-bikes** is transforming access to cycling across a range of ages and abilities and styles of riding (including cargo bikes for deliveries and as family vehicles). An estimated 20,000 arrived in NZ in 2017, double the previous year, and we see this trend continuing with significant uptake in Auckland, given the terrain.
- **Bike share systems** are encouraging a strong uptick in short trips within town centres and to and from transport hubs. While some bike share users are regular and confident urban bicyclists, many are less experienced citizens and tourists who are attracted to the sheer convenience of bike share. With more bike share schemes on the way, Auckland's streets will be increasingly busy with people taking short trips on basic bikes. These new urban cyclists will constitute a strong demand for safe, separated cycleways and connected routes.
- **Bikes in Schools programmes** are expanding, with 30 schools across the city now regularly teaching children to ride via school-based bike fleets and bike tracks. This will likely create a surge in the number of children who are empowered and keen to ride to school. Auckland Transport itself has noted the congestion-busting value of the 'school holiday effect' of more children riding and walking to school: *'If cycling to school was at 1990 levels, there would be up to 39,000 fewer car trips per day in Auckland during the morning peak.'* (AT Cycling Account 2016).

- **Future slower-speed areas in town centres and residential areas** will also assist with ridership growth by creating more encouraging conditions for people to ride for local trips, and these areas will need support via protected bikeways.

The city must be ready to accommodate these new riders with efficient and safe bikeways, and halving the ten-year business case is practically guaranteed to strand many if not most of these riders in unsafe and unsuitable conditions.

2. Related to this: on the five transport challenges laid out in the RLTP, we would add **recovering from years of underinvestment in active transport modes (walking and cycling)**.

This is a watershed moment for Auckland, which like many other cities, is discovering that it cannot build its way out of congestion. A rapid, frequent and reliable public transport service is crucial – but giving people options for getting to and from PT is a key challenge. Safe local cycling can solve this challenge, at speed and relatively affordably.

Cycling expands public transport access to three times that of walking, while reducing car traffic on local streets, and proving a highly efficient and free-moving use of road space. Providing bike parking at public transport hubs is also vastly more cost- and space-efficient than park-and-ride initiatives; an especially important consideration in areas of increasing population density.

We therefore also agree with Greater Auckland's submission on the need for a stronger focus on **improving travel choice**. This is discussed at length in the GPS, ATAP and the Auckland Plan.

3. Bike Auckland would like to see **greater information on what the priorities will be for the first three years, and an assurance that these will address the most critical transport issues (e.g. Auckland's road safety crisis and the historic underfunding of public transport and walking and cycling modes)**.

We are aware that there is a concern within AT that the active transport team may not have the capacity to prepare and deliver more projects in the short term, while still working to deliver delayed Urban Cycleway Fund projects.

This does not mean, however, that the appropriate response for the near term is reducing funding. Instead, cycling investment can be targeted specifically to growing a larger delivery capacity, via increased resourcing and more expert staff. More funding could also be made available for interim tactical safety projects, and 'add-on' bike infrastructure as part of non-cycling projects.

4. Related to this, we would like to see **a focus on Vision Zero / significant harm reduction as a goal for Auckland**. ATAP has “*a 60 per cent reduction in annual deaths and serious injuries across Auckland*” as a goal for the next 10 years. This needs to be reflected across all areas of investment and operations, or it will be an empty slogan. It should also be reflected in AT’s own KPI targets.
5. We still are **concerned at an excessive focus on roading investment**, with a variety of projects that appear to concentrate very large sums of money in pursuit of “travel time savings” or opening up greenfield sprawl. We would like to see some reduction of this funding, in favour of active mode and public transport improvements to serve greater intensification closer to centres – as well as providing more travel choice (public transport, active modes) for greenfields.
6. Related to this, **we also oppose most (car) park & ride initiatives, except in some rural instances**. We consider these to not constitute value for money, and indeed, they can be counterproductive, by inducing more demand for driving.
7. We **strongly support the two proposed Light Rail routes**. We support these initiatives for their huge contribution to travel choice, and their ability to combine beautifully with bikes (and bike share systems) – with the latter serving as first and last mile components for a multi-modal Auckland less dominated by cars.
8. Related to this, we however say that **bike-friendly designs are needed for Light Rail** (including parallel bikeways and improvements to existing-bikeways on the Northwestern Route; and new bikeways wherever feasible on the Dominion Road/Airport route). The design of new stations (and station surrounds) also needs to include bikeways to access the stations, and bike parking provision.

Specific projects

We have specific comment on the following projects (in rough order of how they are listed in the RLTP table, rather than in order of importance):

- Tamaki Drive/ Ngapipi Road safety improvements - these are committed for funding, and we strongly support this initiative to provide clip-on bridge elements for separated walking and cycling on Auckland's busiest bike route
- Orakei Shared Path - we support funding for a Gowing Drive link to the GI2TD path, as it would maximise the use of this new investment by opening up a whole new residential area that is currently inaccessible from the coming new path.
- Minor safety improvements - we support this funding, but note that spread across 10 years, it still only offers some 18 million a year to deal with the large backlog of "minor" safety issues around Auckland. In most cases these are not "minor" at all to people facing obstacles to walking or cycling on a particular route.
- Red light cameras - we strongly support more red light cameras, to address
 - the high risk of trauma from intersection crashes due to drivers running red lights
 - the intimidating effect of red light running, which discourages many people from walking and cycling, or letting their children walk and cycle.
 - We also would like to see more enforcement of existing red light cameras, many of which, as has become clear recently, are still not active.
- Rural road safety programme - We support this funding and would like the implementation to include assessing and addressing barriers to active transport in rural areas, particularly where a given route is the only reasonable option for cycling access.
- Safer Communities and Speed Management - we strongly support this funding and would like to see more slower-speed zones urgently rolled out.
- Urban road safety programme - We strongly support this funding, and call for its implementation to include cycle safety aspects to best practice standards.
- Eastern Busway (four items) - We support the various parts of this programme, particularly the bikeway components. However, we oppose the construction of the Reeves Road Flyover and the Botany Park & Ride, which we consider to be excessive measures aimed at retaining and improving the convenience of driving, and which risk blighting the surrounding areas for decades to come.
- Improving Airport Access - we ask for these measures to include:
 - prioritising active transport
 - creating local links to Mangere East from Mangere's Future Streets area

- safe and convenient PT and active transport routes for people working in the Airport Oaks industrial precinct.
- there is also an urgent need to provide safe cycling links through Mangere to Middlemore for staff at, and visitors to, the Hospital and related medical facilities.
- Active transport sub-category (three items) - We support all these initiatives, **with the caveats** about bike funding in the overarching comments section above.
- Carrington Road Improvements - We support this, but note that it also needs to include best-practice walking and cycling infrastructure (protected bikeways), and that it needs to align with the Government purchase of the nearby Wairaka Precinct, which increased the proposed residential intensification significantly above the 1,400 dwellings stated in the assumptions.
- Lake Road/Esmonde Road Improvements - We strongly support this upgrade, with the caveat that it needs to include protected bike lanes on the main alignment (not in back streets), and dedicated bus priority.
- Lincoln Road Corridor Improvements - While we strongly support the proposed protected bike lanes, we are concerned at the cost of this extensive road-widening programme which risks inducing even more car traffic.
- Manukau Harbour Crossing (Walking & Cycling) - While noted as already committed, we strongly support this funding. It should include interim upgrades to the second nearby crossing under the old SH20 motorway bridge, in case the new crossing closes the existing (to be demolished) bridge before the new bridge can be opened.
- Skypath / Seapath - we strongly support this funding. Based on our knowledge from other projects like Glen Innes to Tamaki Drive, we also see a need for funding for local links to the new facility, including upgrading existing links to maximise their use and uptake.
- Rapid Transit initiatives identified in ATAP (April 2018) (three items) - We support the LRT projects, **with the caveats** made in the overarching comments section.
- City Southern Cycle Link - We support this investigation into a “Southern Cycleway”. The south-eastern Central Isthmus is one of the most bikeway-deprived areas of Auckland, and has enormous latent (and indeed suppressed) demand for everyday cycling, which could significantly assist with transport congestion. An arterial bike connection along the Great South Road / SH1 route would provide a start.
- Northern Connections - We support designing and designating for bikeways in surrounding areas and along SH1, to connect to those provided as part of the Northern Corridor and Seapath / SkyPath projects.
- SH16 Gladstone to Alten Road - We support bike improvements on this link.

- SH16 Stanley St Pedestrian Crossing - While we support this project in principle, we note that it will need to be very carefully designed to provide direct and easy crossing – as, if not done well, it could be both difficult and unattractive to use for pedestrians and people on bikes.
- SH20 / Queenstown Road / Hendry Avenue - We strongly support improvements to these links and interchanges, which in their current form are letting down an otherwise relatively advanced bike network along SH20.
- SH16 Brigham Creek to Waimauku Safe System Enhancement - We are currently in discussions with NZTA to upgrade the quality of cycle safety improvements as part of this project. With this caveat, we support the project.

Unfunded projects

We note that the following projects are listed as unfunded, but in our view *should be funded*, at least in part:

- Te Whau Pathway Shared Path - While we accept that the sought-after funding is very large and cannot be considered to be the responsibility of AT alone, **we submit that at least partial funding is called for**. This would allow the project to begin implementing further stages, to tie together local neighbourhoods, increase active mode use and safety, and thus reduce the increase in driving and funding needs on parallel corridors like Te Atatu Rd.
- Albany Highway (Sunset to SH18) corridor improvements - As part of the Northern Corridor Improvements project, NZTA has committed to working with AT to accelerate delivery on Albany Highway South, providing safe cycling connectivity between Glenfield, Albany, and the western terminus of the NCI Shared Use Path. The project will also address the dangerous Upper Harbour Drive intersection with Albany Highway.

To achieve these goals, this project must have committed funding to align with NCI SUP delivery. We therefore seek **funding for at least partial implementation:**

- **either as interim measures providing safer bikeways**
- **or, a full standard upgrade (for all modes) at least in the section closest to SH18 (as far south as Upper Harbour Drive, including the intersection, at minimum).**

- Victoria St linear park streetscapes - We strongly support including funding for this project, to ensure that the new active mode infrastructure leading into the City Centre is better connected.

A comment on funding for Local Board initiatives

The proposed Local Board allowance of \$242m for transport projects is well-placed to:

- help meet Council's aim of "maintaining momentum on delivering the cycling programme, *incorporating priority for cycling and walking into projects*" (as stated in Mayor Goff's letter of expectation of December 2016)
- align with the ATAP strategic goal of reducing road safety injuries
- enact practical measures that support the Mayor's vision for, and goal of, restoring children's freedom to walk and bike to school and around neighbourhoods as confidently and safely their parents did
- fulfil the policy direction of the current government on safe school routes and active neighbourhoods.

We therefore suggest you consider:

- Giving priority to initiatives that enhance safety and improve local access to active transport and public transport, and/or
- Reserving (some of) the amount as a contestable fund – a local Urban Cycleway Fund, if you will – specifically for local projects that improve people's ability to walk and cycle in their neighbourhoods, particularly safe routes to schools.

In Conclusion

We support the *spirit* of the RLTP – in particular its rebalancing of investment to give Aucklanders of all ages more robust, affordable, meaningful, and healthy choices for getting around the city.

However, we strongly submit that the *letter* of the RLTP must reflect this stated priority – especially in the matter of remedying decades of neglected investment across the city in safe and attractive space for walking and cycling.

We suggest that making the city more amenable to walking and biking, as soon and as widely as possible, will ensure quick wins for our shared quality of life. Front-footing this investment by fully funding the ten-year cycling programme will lay the groundwork for a more healthy, sustainable, and flexible transport system – one that not only meets the

basic needs of everyone who lives in or visits Auckland, but actively *enhances* how it feels to live here and visit here.

Lastly, we'd observe that an ambitious vision for our humblest transport modes – walking and cycling – will be crucial to transforming Auckland from a city ill-famed for its awful traffic, into one renowned for its natural beauty, vibrant streets and lively neighbourhoods. As the great urban architect Jan Gehl says:

“We are realising that if you have people walk and cycle more, you have a more lively, more liveable, more attractive, more safe, more sustainable and more healthy city. And what are you waiting for?”