

Entered by Board Secretary

Auckland Transport's submission on the Government Policy Statement on Land Transport 2021 (GPS 2021)

For decision:

For noting:

Te tūhunga / Recommendation

That the Auckland Transport Board (board):

- a) Approve the submission to the Ministry of Transport, as attached, on the draft Government Policy Statement on Land Transport 2021 and the draft New Zealand Rail Plan.

Te whakarāpopototanga matua / Executive summary

1. The Ministry of Transport (MoT) has released a draft Government Policy Statement update (GPS 2021) and is asking for submissions. At the same time, the Ministry has invited feedback on the draft New Zealand Rail Plan (NZRP).
2. Auckland Transport (AT) has prepared a submission in response to the GPS 2021 and the draft NZRP. In brief, our proposed submission:
 - Highlights revenue loss impacts caused by Covid-19 ("C19") and seeks clarity from the GPS as to how the sector should respond to C19.
 - Supports the inclusion of the Auckland Transport Alignment Project (ATAP) in the GPS as a 'Government Commitment' but seeks greater certainty on the realisation of key funding assumptions, including the 50/50 funding split between Council and Waka Kotahi New Zealand Transport Agency (the Transport Agency) and consideration of an ATAP activity class.
 - Seeks greater agility within the funding system to better support innovation and uptake of new technologies by widening the scope of what can be funded and taking a more outcomes-based approach.
 - Supports the strategic priorities proposed in GPS 2021, these being: Safety, Better Travel Choices, Improving Freight Connections and Climate Change. We recommend including broadening the focus on climate change to cover the wider 'environment' to support progress in addressing a range of key environmental issues.
 - Emphasises the pressures that Auckland faces (namely growth in demand and costs for delivery and operations) particularly around

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impacts on public transport services and ongoing renewals.

- Supports the draft NZRP strategic priorities for rail, which will support the critical role rail plays in Auckland's transport system.

Ngā tuhinga ō mua / Previous deliberations

3. The board recently approved AT's submission on the Land Transport (Rail) Legislation Bill. The draft NZRP was considered in developing our submission on the legislation and the board paper accompanying that submission noted that we are supportive of the NZRP's intent. The board has not previously deliberated on GPS 2021.

Te horopaki me te tīaroaro rautaki / Context and strategic alignment

4. The GPS sets out Government's transport priorities that guide investment from the National Land Transport Fund ("NLTF"). The GPS covers a ten-year period and is reviewed every three years, with the current GPS due for review by 2021. The MoT released GPS 2021 for public comment on 19 March, with feedback due by 11 May, ahead of expected adoption in July 2020. This lead-in timeframe allows local government and the Transport Agency to align their programmes.
5. The NZRP outlines the Government's long-term vision and priorities for the national rail network. Formal engagement on the draft NZRP was cancelled as a result of C19, and instead the MoT is welcoming feedback through the GPS 2021 submission process.
6. The GPS is of key interest to AT as it guides the Transport Agency's investment in Auckland and in our programme. We also have an interest in the NZRP, given the critical role rail plays in Auckland's transport system.
7. This GPS proposes modified strategic priorities, with the key changes being the division of Access into Better Travel Options and Improving Freight Connections and the broadening of Environment to include Climate Change. Value-for-money is recognised as an inherent part of investment decision-making. The table in Attachment 1 shows the key differences in strategic priorities between the current and draft GPS.
8. The GPS proposes changes to some funding activity classes, which set the parameters for investment in activities across the land transport sector, such as road maintenance and renewal or public transport services. The key changes are:
 - consolidation of the road safety/demand management and road policing into one activity class called "Road to Zero"
 - reassignment of the rapid transit and public transport activity classes into public transport services and public transport infrastructure.
9. AT submitted feedback on the Land Transport (Rail) Legislation Bill earlier this year. The draft NZRP was considered in developing our submission on the legislation.

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Ngā matapakinga me ngā tātaritanga / Discussion and analysis

10. Although the 2021 GPS is well-aligned with Auckland's overall strategic priorities and approach to transport, a number of issues still warrant comment in the submission and these are outlined as follows.

Covid-19 Pandemic (Covid-19) Response

11. The 2021 GPS was drafted before the full impact of C19 became apparent and therefore does not comment on the issue.
12. Our proposed submission highlights the likely impacts of revenue loss from C19 on our capital and operating programmes and looks to the GPS and other mechanisms to provide funding support. It also seeks guidance from the GPS as to how the transport sector can help contribute to a medium-term economic recovery from the C19 economic crisis.

Funding certainty for the delivery of the 2018 ATAP programme

13. Funding certainty has emerged as a key issue for AT. The AT submission asks that the GPS go further to direct policy support for delivery of the ATAP programme. Although the ATAP programme and funding was agreed in 2018, the key funding assumptions – particularly around Transport Agency support for AT's programme and achievement of the assumed 50/50 funding share – have not been realised.
14. This GPS highlights the ATAP programme as one of four 'Government Commitments', the others being 'Let's Get Wellington Moving', the Road to Zero and the New Zealand Rail Plan. It sets a 'funding expectation' of \$16.3 billion from the NLTF to support ATAP, which is consistent with the 2018 agreement. The document also notes that the activity classes have been set to deliver Government's desired outcomes from the ATAP programme and include 'sufficient funding to cover the central government share of the commitments' [including ATAP]. We interpret this as a commitment to ensuring funding is available to complete the entire ATAP programme.
15. On this issue, our submission highlights the challenges encountered with securing funding, with funding availability and certainty from the Transport Agency. It endorses the government commitment to ATAP and assurances about activity class funding levels as helping to address funding issues. The submission suggests that the GPS sets clear expectations around certainty of funding for ATAP projects, broadens the scope of what can be funded, and sets expectations around streamlining the funding process along with achievement of the average 50/50 funding share assumption for the AT programme. Changes along these lines would remove much of the churn navigating the funding process and allow AT to concentrate on delivery of the programme and providing certainty to the construction sector. We also suggest that MoT consider a specific activity class for ATAP, along with the other Government Commitments, as a way to simplify and streamline funding.
16. The AT submission also suggests general improvements to the activity class approach, to enable more agile programme delivery. It suggests broadening of scope within activity classes and a more outcomes-based approach.

Policy priorities

17. As noted, GPS strategic priorities are generally well-aligned with Auckland Council and AT priorities, and we agree with the overall alignment, including commitment to the Vision Zero safety approach. Our submission does, however, argue that the GPS's relatively narrow focus on

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climate change could be widened to cover the broader term 'environment', thereby encompassing a wider range of activities. We also seek greater clarity on the way that Maori outcomes can be incorporated into the land transport system.

Other points

18. In terms of other more specific issues, our proposed submission also:

- supports the proposed activity class framework, although requests that the Travel Demand Management (TDM) activity class be retained
- suggests that the approach to freight priorities also needs to allow for projects that improve the efficiency of truck movements for intra-regional freight movement
- suggests that the approach to addressing climate change needs to be better-elaborated within the activity class framework
- highlights funding challenges for public transport services, particularly around new initiatives that will drive additional costs and seeks specific inclusion of on-demand services within the scope of this activity class
- notes pressures on renewals budgets
- supports the draft NZRP strategic priorities for rail, which will support the critical role rail plays in Auckland's transport system.

Ngā tūraru matua / Key risks and mitigations

19. In our proposed submission, AT seeks to minimise key funding risks associated with the capital programme by emphasising the need to align funding with the ATAP programme.

Ngā ritenga-ā-pūtea me ngā rauemi / Financial and resource impacts

20. AT faces severe funding uncertainty for the next two years as the effects of C19 play out. Revenue for our two key funders, Council and the Transport Agency, will be significantly impacted by reductions in fuel consumption and other revenue sources. Without more funding, AT will need to cut our capital programme significantly, with a correspondingly negative impact on the economy. The GPS is essential for ensuring that sufficient funding is available for AT and other approved organisations over the next few years.

21. To mitigate these funding risks, our submission highlights the need to address the short-term C19 situation along with providing of longer-term funding certainty.

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Ngā whaiwhakaaro ō te taiao me te panonitanga o te āhuarangi / Environment and climate change considerations

22. This paper does not have any environment or climate change implications.

Ngā reo o mana whenua rātou ko ngā mema pooti, ko ngā roopu kei raro i te maru o te Kaunihera, ko ngā hāpori katoa / Voice of mana whenua, elected members, Council Controlled Organisations, customer and community

23. The proposed AT submission was drafted with comment from Auckland Council’s Transport Strategy team, who have developed their own, aligned submission.

Ngā whaiwhakaaro haumaruru me ngā whaiwhakaaro hauora / Health, safety and wellbeing considerations

24. The GPS 2021 provides strategic direction to investment in the land transport system, including system safety. As well as being a strategic priority for the Government, safety has been reframed as an activity class: “Road to Zero”, which recognises new Government Strategy on Road Safety.

25. There are no operational health and safety and wellbeing concerns arising from the GPS 2021 or AT’s submission.

Ā muri ake nei / Next steps

26. Following board approval, the submission will be sent to the Ministry of Transport, with copies to Auckland Council and the NZ Transport Agency for information.

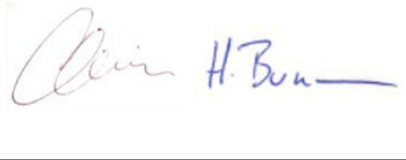

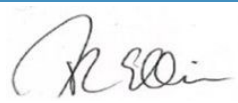
Ngā whakapiringa / Attachments

Attachment number	Description
1	The Government’s Strategic Priorities for transport 2018 and 2021 (reference: GPS Transitions Guide 2021, MoT)

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2	AT Draft Submission on the Government Policy Statement 2021
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Te pou whenua tuhinga / Document ownership

Submitted by	Claire Covacich and Hamish Bunn Principal Transport Planner, Integrated Network Planning; and Group Manager Policy, Planning and Sustainability	
Recommended by	Jenny Chetwynd Executive General Manager, Planning and Investment	
Approved for submission	Shane Ellison Chief Executive	

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Attachment 1: The Government’s Strategic Priorities for Transport 2018 and 2021

GPS 2018 Priorities	GPS 2021 Priorities	Notes
Safety <ul style="list-style-type: none"> a safe transport system, free of death and serious injury 	Safety Develop a transport system where no-one is killed or seriously injured.	<i>Safety remains a priority, with the wording updated to reflect the Road to Zero strategy.</i>
Access <ul style="list-style-type: none"> providing increased access to economic and social opportunities enabling transport choice and access resilient 	Better travel options Provide people with better travel options to access places for earning, learning, and participating in society.	<i>Access remains a priority, but is now covered in two parts to provide clearer guidance. GPS 2021 continues to support better urban transport options and well-connected freight routes. The detailed descriptions of these priorities explain the role of choice, access and resilience.</i>
	Improving freight connections Improve freight connections to support economic development.	
Environment <ul style="list-style-type: none"> reduces greenhouse gas emissions, as well as adverse effects on the local environment and public health 	Climate Change Transform to a low carbon transport system that supports emissions reductions, aligned with national commitments, while improving safety and inclusive access.	<i>The environment remains a priority, with a focus on investments that align with Government’s greenhouse gas reduction targets. Improvements to public health will be a co-benefit of investment decisions that support the transition to a low carbon transport system. There is no longer separation into ‘key’ and ‘supporting’ priorities.</i>
Value for money <ul style="list-style-type: none"> delivers the right infrastructure and services to the right level at the best cost 	<i>GPS 2021 embeds value for money throughout the GPS as a principle that should always be expected from investments. GPS 2021 encourages co-benefits to be considered when developing business cases (e.g. for health, resilience, or environmental sustainability).</i>	

Submission: GPS 2021 & NZRP



To: Ministry of Transport
 From: Auckland Transport Board
 Date: 11 May 2020
 Subject: Submission to the Ministry of Transport on the Proposed Government Policy Statement on Land Transport 2021 and the Draft New Zealand Rail Plan

Auckland Transport

Auckland Transport (AT) is a council-controlled organisation of Auckland Council. AT takes the lead in Auckland's transport planning and delivery. AT is also the road controlling authority (RCA) for Auckland's transport system (excluding state highways) and has responsibilities for all local transport services across the region serving customers and citizens driving, walking, cycling, parking, and taking trips on buses, trains and ferries. Auckland Transport plans, builds and maintains infrastructure - from roads and footpaths stations and wharfs. Auckland Transport's day-to-day activities keep Auckland's transport system moving.

Given the importance of the GPS to our capital and public transport service programmes, we take a keen interest in the document – particularly from a funding and policy perspective. We also have an interest in the NZRP, given the critical role rail plays in Auckland's transport system.

Over the past three years central Government and Auckland Local Government have developed an aligned strategic approach on transport through the Auckland Transport Alignment Project (ATAP). This acknowledges Auckland's current and future transport challenges, and how the transport system needs to develop to meet the region's needs.

AT's address for service is: Auckland Transport, Private Bag 92250, Auckland 1142. Please direct any queries in relation to this submission to: Claire Covacich, Principal Transport Planner, claire.covacich@at.govt.nz.

Introduction

Thank you for the opportunity to provide feedback on the Draft 2021 Government Policy Statement on Land Transport (GPS 2021). AT would like to commend the Ministry for setting out clear context and process for how GPS 2021 is developed. This introduction and lead-in timing reflect the importance of the GPS in influencing Regional Land Transport Plans (RLTPs).

We understand that formal engagement on the draft New Zealand Rail Plan (NZRP) is cancelled in response to Covid-19, and instead the Ministry of Transport (MoT) is inviting feedback through the GPS 2021 submission process. Therefore, this submission also provides AT's feedback on the NZRP.

This submission has two parts:

Part 1: Feedback on GPS 2021

- Raises the issue of the revenue loss impacts associated with the Covid-19 crisis and seeks greater clarity from the GPS as to how the transport sector should respond to the Covid-19 crisis.
- Supports the inclusion of the ATAP in the GPS as a 'Government Commitment' but seeks greater certainty on the realisation of key funding assumptions, including the 50/50 funding split between Council and the NZ Transport Agency and consideration of an ATAP activity class.
- Seeks greater agility within the funding system to better support innovation and uptake of new technologies by widening the scope of what can be funded and taking a more outcomes-based approach.
- Supports the strategic priorities proposed in GPS 2021, these being: Safety, Better Travel

Submission: GPS 2021 & NZRP

Choices, Improving Freight Connections and Climate Change. We recommend including broadening the focus on climate change to cover the wider 'environment' to support progress in addressing a range of key environmental issues.

- Emphasises the pressures that Auckland faces (namely growth in demand and costs for delivery and operations) particularly around impacts on public transport services and ongoing renewals.

Part 2: Feedback on the draft NZRP

In summary, AT is broadly supportive of the draft NZRP. Our concerns (on alignment between the Rail Network Investment Programme and Regional Land Transport Plan) were raised through discussions on the draft legislation that seeks to give effect to the new rail planning and funding framework. We anticipate that our concerns will be addressed in amendments to the NZRP to align with the legislation.

Part 1: Feedback on the GPS 2021

AT's feedback on the GPS 2021 is arranged into the following three areas:

- 1.1 Covid-19 – Role of the GPS in directing a policy response
- 1.2 A funding approach to deliver ATAP and Government's policy objectives
- 1.3 Policy content – Feedback on the GPS strategic priorities and activity classes

1.1 Covid-19

AT considers GPS 2021 as the key opportunity for the Government to provide policy direction on the land transport response to the Covid-19 crisis.

In particular, we are concerned about the effect of the Covid-19 crisis on key transport revenue sources. While the impact on our programme is still uncertain, revenue shortfalls are likely to result in a significant slowdown in delivery of AT's capital programme and public transport services, with a detrimental flow-on impact for the construction industry.

We recognise that some of these impacts, particularly in the short-term, will be addressed by the Government's Stimulus Package and have welcomed the NZTA covering a loss in fare revenue over Levels 3 and 4 of the lockdown. However, given the economic implications may continue for longer, we are looking to the GPS and other mechanisms to help provide the funding certainty that will be required to maintain current construction, maintenance and public service programmes.

Key issues that we think the GPS 2021, along with the wider transport funding system, will need to address are:

- Short-term funding security to both the National Land Transport Fund (NLTF) and local authorities. Our concern is that, without a broad-based funding solution the stimulus effects of investment will be limited and projects that deliver local benefits or public transport and active modes benefits will be disproportionately impacted.
- Developing a policy-approach to medium-term economic stimulus and recovery, potentially including some refocus of short-term priorities. Policy guidance would be helpful to ensure coordination and shared expectations between RCAs as we tackle the challenges of economic recovery.

Other areas of opportunity for the GPS may be developing and managing the land transport system in a way that encourages natural resilience. For example, the future/ongoing role of working from home in travel demand management and the opportunity to encourage and enable more localised travel/reduced travel range while maintaining individuals' physical distancing.

Submission: GPS 2021 & NZRP



1.2 A funding approach to deliver ATAP and Government's policy objectives

Aside from managing the impact of Covid-19, AT's foremost concern is that the GPS 2021 supports delivery of the 2018 ATAP programme and helps to address funding issues we have encountered after that programme was agreed.

Challenges to delivery of ATAP

AT's view is that the funding outcomes necessary for the ATAP programme to succeed are not currently being realised. Critically, Auckland Council's Long-Term Plan (which is the key source of our local share) is predicated on AT's ten-year programme being funded at the levels assumed in ATAP, including through a 50/50 funding share with the NZ Transport Agency. However, to-date, funding support from the NZ Transport Agency has been closer to 40 percent of the programme. This has led to delays and required additional Council support. While these issues have been managed so far, Auckland Transport will be unable to deliver its part of the ATAP programme if this situation continues.

Some of these issues arise from the scope of projects that the NZ Transport Agency is willing / or able to consider through its funding processes. For example, although technology is considered a key enabler of modern transport systems and was highlighted as a key ATAP priority, we have historically struggled to have technology projects funded by the Agency.

These problems of funding share are further complicated by the cumbersome funding application and approval processes. Simply put, these processes are taking too long, are very inflexible, reduce certainty and increase cost. While we appreciate the need for a sound business case process, a more streamlined solution needs to be found – particularly where there is an agreement to an overarching programme such as ATAP. We will continue to work with the NZ Transport Agency to improve these processes, but seek stronger guidance from the GPS to address the issues we have encountered.

Solutions – improved certainty within a more agile funding system

Given these challenges, AT welcomes the recognition in GPS 2021 of ATAP as a Government Commitment. We also welcome:

- the clear expectation that future National Land Transport Programmes should deliver on the investment expectations set out in commitments such as ATAP
- the assurance that the activity classes included in ATAP provide enough funding to cover the central government share for commitments such as ATAP
- the opportunity to address these issues through the ATAP update and other mechanisms.

We interpret these changes as signalling funding certainty for the projects included in the agreed ATAP programme. We also assume that these changes mean that activity class levels should no longer limit funding availability for key parts of our programme, such as maintenance and renewals as our asset base continues to grow.

These changes will help to address some of the difficulties Auckland Transport has encountered with NZ Transport Agency funding falling short of what was anticipated by the 2018 ATAP agreements. However, to ensure successful delivery of the ATAP programme from an AT perspective, we think the GPS needs to go further to:

- set clearer expectations for certainty of funding for all projects in the ATAP programme list
- broaden the scope of what can be funded from the NLTF to ensure all projects in the ATAP programme list are fundable (some categories, such as technology and advanced property purchases, where there has been difficulty gaining funding although they were part of the programme)
- set clearer expectations around the achievement of the 50/50 funding share assumption that underpins the ATAP programme
- set clearer expectations of a streamlined business case process, building on the steps that NZTA has already taken to remove the need for strategic cases for ATAP projects.

Submission: GPS 2021 & NZRP



We think these expectations could be set out through further elaboration of the Government Commitment in Table 4 of the document. This codification of an existing agreement would avoid the issue of precedence for other parts of the country.

We also suggest considering a specific activity class for ATAP, along with the other Government Commitments. A stated allocation is already included in Table 4. Turning this into an activity class would enable the GPS to more clearly set out the expectations for ATAP and remove some of the uncertainty about the overall allocation remaining with the general activity class structure.

Government can also have greater confidence in the changes proposed, above as the ATAP programme is governed by a standing group of Chief Executives under the ATAP Governance Group.

The changes proposed above would remove much of the churn we currently encounter in navigating the current funding process. Importantly, they would allow AT to concentrate on delivery of the agreed ATAP programme, offer certainty to the construction sector and enable us to pursue new and innovative procurement mechanisms based on that greater certainty.

Addressing the constraints of the activity classes: a more outcomes-based approach

While the approach outlined above would work for Auckland in delivering ATAP, we think the activity class approach could still be improved by addressing the scope issues that impact on all approved authorities. As we note above, the scope of what can be funded from the NLTF is a key issue constraining programme delivery, stifling innovation and restricting adaption to new technologies. For example, we spent over a year working with NZTA to find a way to make our Enterprise Asset Management System proposal – which will deliver whole of life costs savings to both AT and NZTA while maintain service standards – fit within the funding rules.

We welcome the Minister's expectation at paragraph 148 that the NZTA will find ways to remove barriers to innovation in its own programme and for other agencies. This is seen as particularly important to enable appropriate social procurement and whole-of-system benefits. However, for this to occur in practice, the GPS itself needs to support this intent by deliberately widening the scope of activities that fall within each activity class.

In this instance, we think a more outcomes-based approach to the activity classes and their definitions is key. We recognise that a shift to a full outcomes-based approach is a big step, but think there is still significant room for improvement within the activity class definitions themselves, and in the guidance around expected results from policy objectives.

As one example, the scope of the public transport activity class, which is currently restrictively defined as "Investment in new public transport infrastructure to improve the level of service" could be redefined along the lines of "Investment in infrastructure that encourages increased uptake and mode change to public transport". This offers the flexibility to bring a range of new infrastructure and service types to the task of supporting mode shift, and doesn't limit the objective to 'level of service improvement'.

We recognise that restricting the scope of what qualifies under the fund also serves as a de facto prioritisation methodology, and this may be appealing from a Ministry point of view. However, we think that ranking proposals based on their contribution to outcomes, rather than the scope of inputs or outputs, is a better and more agile approach - and one that NZTA's processes are robust enough to handle.

In the remainder of the submission, we highlight some specific areas where widening of the scope of what qualifies for funding would enable us to better-support government policy objectives.

1.3 Policy content

AT supports the reframed strategic direction of GPS 2021. The reframed strategic priorities allow AT to interpret the Minister for Transport's direction on investment more clearly than the current GPS. We welcome the integrated nature of outcomes and co-benefits.

Submission: GPS 2021 & NZRP



In order to further this integration and co-benefits, the GPS 2021 should provide clearer alignment between land transport and other government policy frameworks. Transport and land use integration relies on recognition of interdependencies at a governance level. Relationships between policy for government responsibilities such as health, education and social housing should be emphasised in the GPS 2021.

While GPS 2021 identifies the requirement to engage with Maori and reflect the Treaty of Waitangi through a Crown-Maori partnership, none of the priorities specifically identify any connection with Maori outcomes. GPS 2021 could provide more direction on how Maori outcomes can be incorporated into investment in the land transport system. The Climate Change strategic priority in particular provides an opportunity to deliver on Maori outcomes through environmental improvements.

AT recognises that value-for-money is integral to public investment and already inherent in decision-making processes such as the business case approach.

Strategic priorities

Safety

AT supports retaining Safety as a strategic priority. This is aligned with Auckland's Vision Zero approach to managing the transport network. However, Auckland's transport safety strategy sets a target of reducing current road deaths and serious injuries by 60 percent by 2027. This is more ambitious than the Government's target of reducing current road deaths and serious injuries by 40 percent by 2028.

Better Travel Options

AT is supportive of refocussing the current GPS strategic priority of Access into two, more focussed priorities of Better Travel Options and Improving Freight Connections. This will shift and increase focus on improving movements for goods and services.

Following are specific suggestions for note on this strategic priority:

- Section 2.3 should emphasise the relationships between land transport and other government policy frameworks e.g. education, housing, health.
- AT suggests that Section 2.3 should be more explicit in that this also means widening the range of travel options available. As written, this section could be interpreted as only making existing options better, which could be counter to the intent.
- Another co-benefit that we suggest is included is space efficiency. Where they are well-used active modes, public transport and high occupancy vehicles can be space efficient modes. This is particularly important in urban settings where there is contest for space.
- We support reference to regional mode shift plans We suggest reference to Regional Public Transport Plans (RPTPs). As statutory documents, these establish the expectation for public transport delivery and operation.
- AT suggests a more targeted indicator on public transport travel time reliability. This is proven as a key factor in public transport attractiveness.
- Further opportunities exist to resolve perverse outcomes affecting the transport system. An example is the (already exhorted) initiative to waive fringe benefit tax to enable employers to subsidise and incentivise employee use of public transport. This would enable and encourage the private sector to help deliver on this strategic priority.

Improving Freight Connections

AT is supportive of Improving Freight Connections as a strategic priority and transport planning with a mode neutral approach. Nonetheless, it should be recognised that Auckland's regional

Submission: GPS 2021 & NZRP



freight network hinges on truck transport and most intraregional freight trips are necessarily made by truck. AT has been developing a freight plan in conjunction with partners, including the MoT and industry stakeholders, for future freight projects which will look to improve freight connections within the Auckland region. AT provides the following suggestions for inclusion in regard to this strategic priority:

- Inclusion of an 'efficiency' indicator for freight to encourage best use of the various modes. This could assist with decisions in a mode-neutral way.
- Reference to reducing conflict between freight and metro rail services (for AT this would capture issues such as the third main line).
- Ensuring that the framing of this objective also supports projects that improve the efficiency of freight delivery by truck, particularly for intra-regional movements.

Climate Change

AT welcomes the inclusion of Climate Change as a strategic priority. This is seen as a critical step forward towards sustainability. In New Zealand, environmental health has strong link with cultural values, and it would be both appropriate and effectual to make this connection. There is room for greater detail and guidance as to how this priority can be achieved in the transport sector. Auckland Council provides further details on this in their submission, which we support. AT notes the following opportunities to support this area of strategic priority:

- Because there is no specific activity class for Climate Change/environment, and climate change investment is expected to be delivered through other activity classes, particular attention is required to providing planning framework and assessments that align and support positive environmental outcomes (under other activity classes). These processes need to be enabling for environmental outcomes such as bus fleet electrification. GPS 2021 should elaborate on how initiatives can be approached or assessed in a more innovative way to demonstrate climate change credentials and positively link environmental investment and economic prosperity.
- The only indicators proposed for Climate Change relate to air quality. Emissions reduction is only one aspect of managing climate change. Water quality, flooding and biodiversity are other environmental considerations with land transport system impacts. These environmental considerations should also be reflected through indicators.
- Air quality is affected by many factors unrelated to land transport such as heating sources and weather; potentially making this a spurious measure of progress. Because there are so many other factors contributing to air quality, it is important that government policy in other areas connects to strategic outcomes such as Climate Change (the HUD is an example, equally Ministry of Health and Ministry of Education have strong roles in land use development, thus impacting transport patterns).
- AT suggests that one way to meaningfully incorporate broader environmental outcomes is recognition of the role of "streetscapes" as a conduit to environmental outcomes. The presence of vegetation contributes to carbon sequestration and can assist with traffic calming, safety, ecological pathways and heat stress reduction. Streetscaping is an area of the land transport system that has traditionally not been funded.
- Other suggested indicators are proportion of the public transport bus fleet (including school buses), as low emission. Similarly, proportion of the private vehicle fleet as low emission.
- Although not strictly an environmental issue, explicit support for social procurement initiatives would also be welcomed as a key area where transport sector investment can contribute to wider social and economic outcomes.

Submission: GPS 2021 & NZRP

Activity classes

Travel Demand Management

AT requests retention of the TDM activity class, or at least modification to the GPS guidance to ensure that TDM is supported. AT is concerned that removal of clear references to this activity could impact on funding availability, though TDM is a key lever identified in 'making the most of our existing land transport network'.

TDM falls into a number of areas, including safety, active mode and public transport promotion and improvements and all with a customer focus. This whole of system approach, as mentioned in paragraph 95-96, relies on behaviour change programmes such as TravelWise as a key intervention. Not having a recognised activity class for this programme has proved to be an issue for us in the past, when our TravelWise and Business Travel Planning programmes were forced to align with the outcomes of just one activity class.

Auckland has significant history and success in the TravelWise programme with 420 schools participating (out of just over 550 schools in the region) and annual survey data on mode shift patterns for schools participating in TravelWise programme (in some cases 15 years' worth of data). Lack of funding for this programme would also impact on the effectiveness of actions from the Road to Zero strategy, i.e. improving school speed zones, enhancing safety and accessibility of footpaths and cycle lanes.

Climate Change

AT would like to see better links between the Climate Change priority and expected delivery through activity classes. We acknowledge that the climate change and environmental impacts of transport are generally by-products of most projects and therefore not simple to address through investment. To mitigate this, more thorough consideration needs to be given to how to shape and influence investment for positive environmental outcomes. AT acknowledges that the Government and Councils are currently involved with this work.

From a practical perspective, we are keen to ensure that GPS guidance is broad enough to allow for key climate mitigation projects. For example, a key opportunity for Auckland is early realisation of the Low Emission Bus Roadmap. AT plans to contract for low emission buses from 2025 onwards and have a full low emission fleet by 2040. Auckland's Mayor has recently stated a preference that AT accelerate the conversion of Auckland's bus fleet to electric vehicles. This would have implications for bus contract costs and renewals costs but is an area that could clearly bring benefits for the Climate Change strategic priority. AT suggests consideration of whether the Public Transport Services Activity Class could accommodate this funding.

Road to Zero Activity Class

AT welcomes the Road to Zero activity class and suggests amendments to Road Policing and Road Safety Promotion components to help achieve the Road to Zero 2030 targets.

The GPS 2021 includes the Road to Zero activity class as a new approach to improve safety and reduce death and serious injuries (DSI). Road to Zero includes initiatives that are currently funded as part of the promotion of road safety activity class, as well as road policing. AT supports this approach and that the activity class proposes significantly more funding than the current GPS.

Paragraph 12 states that around 70 percent of Road to Zero funding is allocated to areas outside Auckland and Wellington. Therefore, around 30 percent of funding allocation from the Road to Zero activity class is to Auckland and Wellington. AT requires further information on the Road to Zero allocation to understand whether or not there is sufficient allocation for AT's and our partner NZ Police's safety programme, including System Management activities and Workplace Health & Safety activities. For example, the Auckland 2018/28 Road Safety PBC recommends an additional one hundred Road Policing staff over ten years which does not

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align with the GPS 2021. AT requests confirmation that the funding allocated to Auckland aligns to the NZTA-endorsed 2018/28 Road Safety Programme Business Case (PBC) \$750 million investment.

We also note that the Road to Zero and walking and cycling activity classes should make allowance for the changes needed to support the 'Accessible Streets' regulatory package. In particular, there will be a need for education campaigns and infrastructure funding to achieve the intent of the Accessible Streets package in a vision zero context.

Public Transport Services Activity Class

AT supports the separate Public Transport Services and Public Transport Infrastructure activity classes.

AT recognises significant pressure for additional funding from public transport activity classes. This pressure comes from increasing costs of operating the network (some due to changes to the Employment Relations Act), as well as from the need to invest in new infrastructure to improve the network and provide additional capacity to respond to urban growth and to patronage growth. We seek clarification and assurance that regional public transport planning can be funded from the activity classes.

AT would like clarity as to whether the Public Transport Services activity class has sufficient coverage for the:

- SuperGold card operation, and sufficient provision for the continued growth/demand for SuperGold card to continue to be 100% funded,
- Indexation of drivers across services, new delivery models (such as ongoing Public Transport Operating Model (PTOM), rail and ferry procurement models that are being developed),
- Other Government public transport initiatives that may be anticipated (e.g. Green Card concessions).
- Costs associated with operation, maintenance and renewals for City Rail Link project (CRL) and for other rapid transit plans in Auckland. While these are likely to be outside the first 3 years of the GPS, the activity classes need to acknowledge this step-up once it is online.
- Anticipated increases in service frequency aligned with ATAP and our RPTP.
- Provision for the increase in PTOM contract costs associated with the electrification of bus fleets
- Explicit allowance for the use of this funding to support "On Demand" transport services – which is a key area AT is exploring as part of its approach to mobility as a service.

AT supports the GPS 2021 referencing regional mode shift plans. We also suggest reference to RPTPs – as these are after all the relevant statutory documents - and confirmation of funding in principle to public transport improvements as outlined in RPTPs.

Section 124 refers to rail network maintenance funding coming in part from the Public Transport Services activity class. It is not clear how much funding will come from the Rail Network activity class. Clarification on this would be helpful.

Public Transport Infrastructure Activity Class

A Rapid Transit activity class was included in the current GPS to invest in busways and light rail infrastructure. Under GPS 2021, the Rapid Transit activity class is incorporated into the Public Transport Infrastructure activity class, as is Transitional Rail.

AT is currently assessing the impact of continued high increases in rail patronage, including the boost that is expected around the time of the opening of the CRL. Continued growth may

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impact upon the timing of purchase of new trains, and supporting infrastructure, ATAP update will provide an opportunity to raise these issues.

Walking and Cycling Improvements Activity Class

Auckland has ongoing pressure to improve, retrofit and deliver active mode infrastructure, particularly for people on bikes. AT supports any increase in funding to enable improvements in these areas of historic under-investment (particularly for cycling infrastructure).

While funding for this activity class is around 3 percent of the NLTF and slightly more than in previous years, we query whether this will enable Mode Shift Plans.

We suggest referring to this activity class as “active modes”, including micro-mobility, to align with current planning and policy in these areas.

Local Road Improvements Activity Class

We note the pressures that population growth and growth in travel demand are placing on local road and public transport maintenance and improvements. This is an area where the size of the activity classes has limited what we can deliver. Given the commitment to ATAP in this GPS, we look forward to these activity classes being adjusted to address this issue.

Transport investment to support growth initiatives cut across multiple activity classes, including the local road improvements, Road to Zero and public transport activity classes. It is crucial that having assigned activity classes does not impede or preclude funding for transport investment in areas that do not clearly fall into one area, such as that required to support the growth pressure that Auckland faces.

A key example of this is the large-scale comprehensively planned growth occurring across Auckland within brownfield/redevelopment areas. AT requires funding in these areas to support quality, efficient and liveable urban form. These upgrades and improvements include intersection upgrades, new roads, safety improvements, walking and cycling improvements, and renewals (e.g. pavements, footpaths, kerb and channel, and drainage).

There are a number of initiatives that are currently unfunded but are required to support growth in greenfield and brownfield locations across Auckland and align with the Future Urban Land Supply Strategy. ATAP update will provide an opportunity to raise these proposals.

AT is concerned that there is insufficient funding in the Local Road Improvements activity class for Advance Property Funding, where route protection processes incur property costs in advance of construction, particularly for growth and major projects within the Auckland Region. In these instances, AT has to fund property purchase upfront and cannot apply for funding until construction is underway.

Electric buses are noted above as an opportunity for improving emissions. Related to this, this activity class may need to consider the incremental road renewal costs of electric buses.

Local Road Maintenance Activity Class

AT supports any increase in funding allocation to the local road maintenance activity class. AT has significant cost pressures in areas of maintenance, operations and renewals. This is caused by a number of issues including:

- higher standards to address environmental and safety issues (e.g. extra stormwater treatment requirements, SCRIM (pavement surface skid resistance) testing),
- cost increases in new maintenance, operations and renewals contracts,
- the impact of truck movements for increasing residential housing construction on parts of the local road network, and
- having to maintain an ever-increasing asset base.

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AT has been managing these renewals costs by bringing forward budget from future RLTP years. This is an interim solution and the need for increased baseline budgets will need to be considered in the 2021-31 RLTP. Given the commitment to ensuring ATAP investment levels are achieved, we expect some modification to the activity class will be needed to alignment with ATAP funding assumptions.

Rail Network Activity Class & Coastal Shipping Activity Class

With two new activity classes for Rail Network and Coastal Shipping there is an opportunity to start to shape the freight network around these modes. However, funding for the Coastal Shipping and Rail Network activity classes is very limited.

Only some of the rail network improvements included in the agreed ATAP programme subsequently had funding provided to them through the Transitional Rail activity class. There are a number of ATAP projects that have not received funding, and the funding source therefore remains unclear. ATAP update will provide an opportunity to raise these proposals.

While KiwiRail is responsible for delivering most of these projects, AT currently operates as NZTA's Approved Organisation for these Auckland-based rail activities. As the Transitional Rail activity class no longer exists, the level of funding available within the Public Transport Infrastructure activity class may not allow for these projects.

There is a lack of clarity around which activity class will cover projects that KiwiRail are responsible for, whether there is enough funding allocation, and whether AT can access this fund on behalf of KiwiRail

The current GPS assumes the Land Transport (Rail) Legislation Bill will pass as currently written. AT has submitted on the Bill and requested changes. AT will assume any changes will be incorporated into the final GPS.

Part 2: Feedback on the Draft New Zealand Rail Plan

AT welcomes the draft NZRP and supports the NZRP's strategic priorities for rail, which will support the critical role rail plays in Auckland's transport system.

As noted above, AT submitted on the draft legislation intended to give effect to the new planning and funding framework in the NZRP. In that submission we supported the Bill's intent but sought key changes regarding the alignment between the Rail Network Investment Programme (RNIP) and Regional Land Transport Plans (RLTPs), and also sought the protection of existing funding arrangements under the Auckland Network Access Agreement.

AT notes that the Select Committee has reported back on the Bill and expects that the NZRP will be amended to reflect the proposed changes to the legislation (assuming these are passed), in order to clearly articulate the new framework as enacted by legislation. The final NZRP should better-articulate how the RNIP and RLTP processes will interact.

AT supports the Investment Priorities for the Auckland Metropolitan Network in the NZRP, and notes that they are aligned with ATAP 2018 priorities. AT also expects that these priorities will be updated to reflect:

- The projects announced as part of the New Zealand Upgrade Programme (NZUP), including details on when these will be delivered, and which organisation(s) will be responsible for delivery.
- Subsequent changes to the Investment Priorities that may arise from the ATAP update process (if available when the NZRP is finalised), which may include new projects to make use of funds available as a result of NZUP.