

5 June 2015

Auckland Transport
Variation to the Auckland Regional Public Transport Plan
Statement of Proposal

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NZCID Feedback on the Variation to the Auckland Regional Public Transport Plan Statement of Proposal¹

The New Zealand Council for Infrastructure Development (NZCID) welcomes this opportunity to provide Auckland Transport with feedback on the Variation to the Auckland Regional Public Transport Plan (the RPTP) Statement of Proposal (the Statement).

Summary

Light rail represents a strategic investment for the region and we fully support investigation of light rail by Auckland Transport.

We have difficulty supporting the inclusion of light rail in the statutory RPTP for two reasons:

1. There is not enough evidence available outlining the need for light rail or demonstrating how light rail will address an identified problem.
2. Light rail does not feature in either the Auckland Plan or the National Land Transport Plan and has not been assumed through development of the Proposed Auckland Unitary Plan and is therefore not integrated with the wider planning framework.

We consider the inclusion of light rail in the RPTP to be premature at this time.

We encourage Auckland Transport to release investigation findings relating to the need and effectiveness of light rail solutions on the isthmus.

We further encourage Auckland Transport to work with the Auckland Council to refine the Auckland Plan to integrate light rail where appropriate and engage with urgency the Proposed Auckland Unitary Plan Independent Hearings Panel to seek land use changes around potential light rail corridors.

We support the introduction of light rail on the Auckland isthmus where published analysis shows a demonstrable benefit to the region.

¹ This submission represents the views of NZCID as a collective whole, and may not necessarily represent the views of individual member organisations.

Light rail should be part of the discussion

We support the consideration of all transport options to address Auckland's transport needs.

We have read the City Centre Future Access Study and share Auckland Transport's concern over bus congestion on key corridors connecting the central city.

We therefore support in principle Auckland Transport's consideration of light rail as a transport option to address transport demand pressures on the isthmus.

Light rail was discounted in 2012

However, while the CCFAS found bus congestion to be an issue, its prevailing finding was that:

taking an Integrated option of the Underground Rail option and filling in gaps with the best operational aspects of the surface bus option will effectively address City Centre Access for the next 30 years and beyond from the south, east and west as well as the central and southern isthmus.²

That is, at the end of 2012, just two years before the request for feedback on this RPTP process, the comprehensive CCFAS considered that the CRL and surface bus improvements were sufficient to meet growth in the city centre to 2041.

It should be noted that the CCFAS did consider:

A long list of potential options within a number of parameters:

- **Mode:** Including bus, rail, light rail and personal rapid transit (PRT).
- **Scope:** With options ranging from optimisation of existing assets through to additional infrastructure.
- **Location:** Overlaying these modes, underground, surface and above ground variations were considered. Critically, the long list also included consideration of approaches outside of the City Centre and City Fringe.³

The decision to preclude light rail in favour of the CRL and surface bus option was made:

in consultation with Auckland Transport and Auckland Council and central government.⁴

And this process was:

consistent with international best practice for transport projects. It is also consistent with NZ Treasury guidance for long list option development contained in their Better Business Cases toolkit.⁵

² City Centre Future Access Study, p. 7.

³ City Centre Future Access Study, p. 14.

⁴ City Centre Future Access Study, p. 14.

⁵ City Centre Future Access Study, p. 14.

We cannot understand the abrupt change in evidence-based policy

We are concerned that an apparently robust process investigating the 30 year capacity of transport services to the city centre has been discounted within two years of that study's completion.

We acknowledge that there may have been a change to Auckland Transport's Statement of Intent or some other guiding document since 2012 of which we are unaware and which has had the impact of materially influencing defined transport outcomes.

In this case, it may be that both the CCFAS and ongoing investigations into light rail have been sufficiently rigorous and that new objectives are responsible for the change in policy position.

We ask Auckland Transport to advise us of any change in its guiding documentation which would have the effect of materially changing its policy position on city centre access.

We need more information on light rail

If there has not been a change of this nature, then there is a high risk that either the CCFAS or investigations to date into light rail have not been sufficiently rigorous.

The long list assessment process described above suggests the CCFAS followed best practice.

We are not in a position to conclude that ongoing light rail investigations have been inadequate because we have insufficient information.

The Statement indicates investigations "have concluded that light rail is the best option to provide for increased capacity, reliability and speed" in "those parts of the Auckland isthmus that cannot be served by the metro rail network."

What are these investigations and why have they not been made publicly available to inform an open and transparent public submission process on a statutory document?

An important consideration is that, if the CCFAS is now obsolete just two years after publication, what other long term plans developed by the Auckland Council family are equally invalid?

How can stakeholders, businesses and the residents of Auckland have confidence in long term planning processes which affect major long term private decisions if a 30 year study like the CCFAS can be revised so significantly after just two years?

It is in our view important that Auckland Transport release study findings on light rail to provide confidence that good processes are guiding major project decision making in Auckland.

The risk with the current process is that it suggests a degree of inevitability regarding major public decisions before the public has a meaningful opportunity to provide input.

In our view, contestability of ideas and external consideration of major public initiatives helps improve the decision making process and is a requirement under the Local Government Act 2002.

Absence of information on the light rail proposal impedes engagement.

We do not know the cost of the proposed light rail solution or what projects it may replace.

We do not know the timing of the proposed light rail solution or what projects it may defer.

We do not know what the impact on local communities will be, nor what the impact on the regional transport network will be.

And yet we are being asked to support the inclusion of light rail in a ten year statutory document.

This puts an organisation like ours, with a commitment to improving Auckland infrastructure, in the difficult position of either supporting an investment which subsequent analysis may show is not good value for money or opposing investment which we think has the potential to be a valuable part of the Auckland transport solution.

We strongly encourage Auckland Transport to publish information on light rail sufficient to inform our public position on this option.

We acknowledge data collection is in its early phase, but note that it is sufficient for Auckland Transport to conclude that "light rail is the best option to provide for increased capacity, reliability and speed."⁶

We would support Auckland Transport's provisional release of information, noting that analysis remains in development stages.

This information is essential before light rail is included in the RPTP.

Light rail must be integrated into the Auckland Plan before the RPTP

A wider and more complex issue relating to the inclusion of light rail in the RPTP is what effect this initiative will have on other regional plans, programmes, rules and resources.

In this regard, we welcome the consideration of light rail.

Auckland Transport's analysis of future transport outcomes for Auckland is showing very disappointing results given high projected expenditure over the next 30 years.

Traffic modelling shows that Auckland will have fewer jobs accessible by a 30 minute commute beyond 2025 than we have today, travel speeds for the 70% of commuters without access to viable public transport services will be much lower, inter-peak travel congestion will become a serious problem and freight and commercial trips will be slower and more expensive.⁷

Revision of transport priorities identified in the Auckland Plan is urgently required and light rail should be considered either in addition to or in place of some current priority investments.

However, this work is complex, ongoing and requires close coordination with other transport bodies, including the New Zealand Transport Agency and the Ministry of Transport.

We strongly support an Accord between the Government and the Auckland Council family on Auckland transport matters.

We must as a region understand why proposed transport investment delivers such poor results into the future and identify more effective solutions.

It is possible that light rail will provide better transport outcomes for Auckland, but it will not do so independent of the wider network.

A critical factor in this process will be prioritising investment and identifying funding.

Auckland currently has a \$12 billion funding gap

Using international comparisons as a very general guide, a cost in the vicinity of \$2 billion may be expected to roll out the light rail programme identified in the Statement.

⁶ Statement of Proposal, p. 6.

⁷ Regional Land Transport Programme 2015-2025.

It is not clear in the Statement how Auckland Transport expects to fund light rail.

The challenge of funding light rail should not be underestimated and this work should be part of the Accord agreed with Government on Auckland transport matters.

We therefore encourage Auckland Transport to engage both with the Auckland Council and central government agencies on how best to align, integrate and evaluate light rail in context of the broader Auckland Plan investment programme.

If light rail emerges through this broader and more strategic analysis as a regional priority delivering benefits above and beyond alternatives, we would support its inclusion in the RPTP.

Light rail must be integrated into the Unitary Plan

In addition to harmonising light rail within the Auckland regional transport programme, it is equally important that light rail is consistent with land use.

In order for a major public transport initiative such as light rail to succeed, the project must both support, and be supported by, land use provisions.

As a high fixed cost, high capacity public transport service, light rail requires accordingly high levels of patronage to justify investment.

Patronage can either be facilitated either by private motor vehicles, i.e. through park and ride, or through proximity, i.e. intensified land use around stations.

Given the location of the proposed light rail corridors and the Auckland Plan vision to achieve a quality compact city, park and ride is unlikely to meet the objectives of the region.

Thus, intensification around the light rail corridors is required to generate the demand necessary to justify light rail investment.

The Proposed Auckland Unitary Plan, however, makes little provision for new intensified development adjacent to proposed light rail corridors.

Figure 1 highlights the areas of the isthmus under the Proposed Auckland Unitary Plan proximate to light rail as proposed in the Statement. The lighter colours indicate stronger development controls, with the areas inside the rings dominated by single housing zoning.

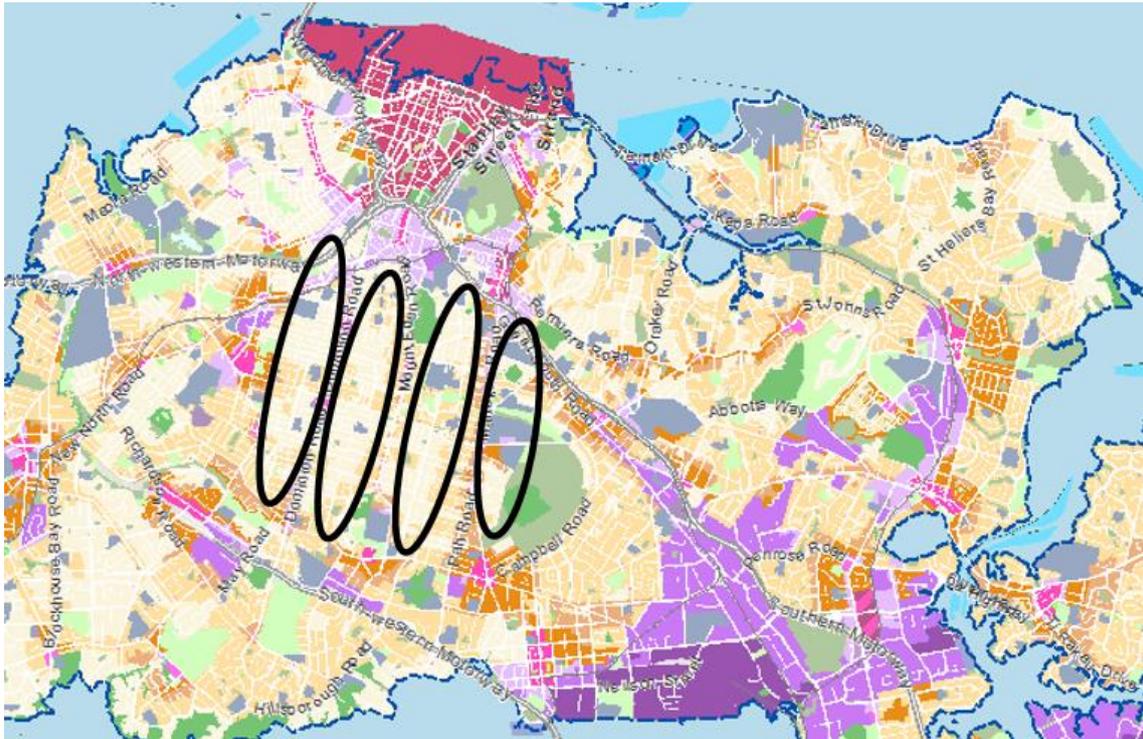
Not only will single house zoning inhibit ridership by limiting the number of residents living within walking distance to rail stations, development controls will prevent land value appreciation which will be critical to funding the high cost of light rail in the first instance.

The Proposed Unitary Plan does not support light rail as outlined in the Statement.

The challenge of engendering public acceptance for the kind of land use change required to justify light rail expansion in these heritage areas should not be underestimated.

We encourage Auckland Transport to engage with urgency the Unitary Plan's Independent Hearings Panel to discuss the land use implications of light rail on the isthmus.

Figure 1: Land use controls in the Proposed Auckland Unitary Plan



We thank Auckland Transport for this opportunity to submit.