

Providing feedback on the Draft GPS 2018

Thank you for taking the time to review the draft GPS 2018 and provide us with your feedback. Please download this form and submit your feedback by **5pm on 2 May 2018**.

Please note that submissions received after this date will not be accepted.

Submission is on behalf of:

**Business North Harbour Incorporated.
Submitted by Peter Lamberton – Chair and
Janine Brinsdon – General Manager**

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Introduction:

Business North Harbour is a significant commercial/industrial Business Improvement District (BID), representing over 4500 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 educational institutions within or on our boundary, including Massey University Albany and a variety of primary and secondary schools all within an industrial estate which is on average less than 20 years old.

Upper Harbour Local Board area is expected to be one of the fastest growing area 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 those decisions within the Draft Government Policy Statement on Land Transport 2018/19 -2027/28 which:

- impact on economic development and the ability to leverage value from location
- impact on access to both regional and localised transport hubs
- support or restrict business growth opportunities
- impact on R&D and investment – transport sector development and capability
- impact on the cost of business – across a short to medium timeframe

We understand the role of the GPS as outlined in section 1.2 of the consultation documentation¹ and the influence the GPS exerts over the National Land Transport Fund, and, amongst others, Auckland Council's (local government) Regional Land Transport Plans. We recognise the importance of the GPS in the guidance it provides for expenditure of over \$4bn per year through the National Land Transport Fund, and a further investment of \$1.5bn per year through local government investment and \$0.5bn per year of Crown Investment.

The extent of our submission is limited by the absence of the finalised Auckland Transport Alignment Project (ATAP) which at the time of submission, was still under review by central government. We trust the intent of ATAP will align to those priorities stated in the GPS document. We reserve the right to provide further comment on the content of the ATAP report, once released.

Our submission on the GPS was constrained due to the delayed release and consultation timeframe of the Auckland Transport Alignment Project (ATAP) and the Regional Land Transport Plan (RLTP) – now due for release for consultation 30 May 2018. As we have not fully consulted across our membership as to the priorities contained with the RLTP, we reserve the option to continue our dialogue on the alignment of the GPS, RLTP and ATAP in the future.

Business North Harbour's submission will focus on the four key strategic priorities as outlined in the Draft Government Policy Statement on Land Transport: 2018/19 - 2027/28 (GPS).²

The GPS helps guide investment in transport by providing a longer term strategic view of how we prioritise things in the transport network, and why. We welcome your thoughts on all elements of the draft GPS however there are some parts of the GPS we would like to draw your attention to:

The strategic direction

- The draft GPS has four strategic priorities; access, safety, environment and value for money.*
- Safety and access have been given higher priority than the other priorities. We are interested in feedback on this prioritisation.*

STRATEGIC PRIORITY 2.3: ACCESS

Business North Harbour supports in principle, the GPS's direction regarding improved access.

- Provides increased access to economic and social opportunities
- Enables transport choice and access
- Is resilient

¹ Draft Government Policy Statement on Land Transport: 2018/19 - 2017/28, Section 1.1 para.6

² Draft Government Policy Statement on Land Transport: 2018/19 - 2027/28, Section 2: Strategic direction

As defined in the GPS³, 'Access is ...people's ability to connect with people, goods, services and opportunities and thereby engage in economic and social activity...'.³

We accept the need for consideration of environmental issues when looking at land transportation, plus the need to cater for the tourism market. However, our membership has a higher focus on regional and national freight capacity, and an accessible, substantial, well-educated and skilled workforce who do not have to face an excessive daily commute.

We support and encourage the focus on effective urban centres and recommend that sustainable, economic development and capacity features highly.

We acknowledge the need for resilience across the land transport programme, and recognise the approach outlined in section 2.3.3. of the Draft GPS documentation.

Outside of irregular occurrences, across Auckland there is a real issue of decreasing productivity with many citing access and congestion as major contributing factors. At a local board – local government level, North Harbour (Upper Harbour Local Board) is out performing Auckland's Productivity levels⁴. However, it is very clear to both commuters and business operators, that the projected population growth for the Upper Harbour board area will continue to erode localised productivity capacity, without escalated investment made in alternatives to the single occupancy vehicle (private and commercial use) across the North Harbour/Auckland region. 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 2013⁵.

Business North Harbour wishes to highlight one key project which would deliver against the stated priorities of GPS2018 and assist to mitigate the risk of significant cost to New Zealand's economy caused through congestion. This project is the **Additional Waitemata Harbour Crossing**. The provision of a multi modal second Auckland harbour crossing will provide certainty amongst a growing population, would support continued investment in business and commercial enterprises, and it would have a positive impact on the following:

- Address the decline in Auckland GDP/Productivity – cost to country and region
- Prioritisation of freight movements
- Access to localised economic hubs
- Access to employment and education

Significant research resources¹ have been invested in this project by previous governments, and Business North Harbour will advocate for this project to be activated within the timeframes of the GPS 2018/19 – 28/29, ATAP 2018 and Regional Land Transport Programmes.

Based on the reasons outlined above, Business North Harbour considers improved **ACCESS** should be the **GPS's number one equal priority** and that this status should be reflected in the allocation of capital and operational resources.

³ Draft Government Policy Statement on Land Transport: 2018/19 - 2028/29, Section 2.3

⁴ <https://ecoprofile.infometrics.co.nz/Upper%2bHarbour>

⁵ <https://www.aucklandcouncil.govt.nz/about-auckland-council/how-auckland-council-works/local-boards/all-local-boards/Documents/upper-harbour-local-board-plan-2017.pdf>

STRATEGIC PRIORITY 2.3: SAFETY

Business North Harbour understands, and supports in principle, the need for multimodal options. We acknowledge that safety concerns regarding walking and cycling are obstacles for participation for some commuters.

We stress the need for multimodal options need to be considered within the context of the physical environment. We stress the need for those responsible for infrastructure decisions to be mindful that one policy across Auckland does not always reflect the local needs.

GPS 2018 needs to reflect the dynamics of the commercial and industrial business districts, these specific requirement needs to be understood. We are concerned that expansion of walking and cycling provisions cannot be at the expense of business vitality.

STRATEGIC PRIORITY 2.4: ENVIRONMENT

Business North Harbour supports the outcome of reduced greenhouse gas omissions through diversification and government initiatives for alternative fuel sources.

We support the GPS2018 intent to see an improved and more balanced integration of land uses in relation to transport modes and networks to reduce the adverse environmental effects of transport activities. We are pleased to note the focus on improved planning of the land transport system and land usesⁱⁱ to provide better access to locations for work, live, study and play. We seek further investment from central and local government to ensure there are real alternatives provided within residential and commercial communities to incentivise the use of alternative modes rather than single occupancy vehicle. These real alternatives are yet to be realised for many areas across North Harbour, and wider Auckland. The lack of real alternatives is impacting both on congestion and therefore the environment, plus productivity and the wider economic environment.

STRATEGIC PRIORITY 2.5: VALUE FOR MONEY

We note the reference, page 6, para 16 in which the (GPS) policy refers to the need for some investments with low benefits relative to costs that are necessary to advance Government policies. Our interest relates to the transparency of those decisions and the support for these investments.

INVESTMENT IN LAND TRANSPORT

Transitional Rail

Business North Harbour supports in principle the investment strategy outlined section 2.6, 150⁶, which refers to 'improving urban rail services for passengers accessing housing, major employment areas and major metropolitan areas, where demand is outstripping capacity, to improve reliability or to reduce conflict between freight and passenger trains.'

Auckland's North Shore meets all housing and employment intensification criteria above with Albany Metropolitan Centre identified as a strategic growth area for Auckland. Demand is outstripping capacity across public transport and road transport across the north shore. The lack of capacity across the current transport network reinforces the need for the Additional Waitemata Harbour Crossing (AWHC) project. Business North Harbour stresses the importance of the AWHC project to be fast tracked - with progress being made within the life of this draft GPS, through inclusion of this project within the Auckland Regional ATAP and RLTP strategic documentation.

⁶ Draft Government Policy Statement on Land Transport: 2018/19 – 2028/29, page 22

Total Funding for GPS 2018, Section 3.1⁷

In the draft GPS, reference is made to Government's current consideration of increases to fuel excise duty and road user charges. Both are important to our members as they have a direct cost on their operational expenses, and price of goods to market. A further \$0.03 - \$0.04 cents per litre (and equivalent for road user charges) per annum, for three years is a significant cost for Auckland businesses, especially with the Auckland Regional Fuel Tax of \$0.115 per litre (inclusive of GST) being implemented 1 July 2018.

Our members seek greater transparency and surety from central and local Government regarding costs over which they have little control. If the discussions are at such an advance stage to justify mentioning in the GPS documentation, it is our member's expectation that timelines could also be given to enable them to plan with confidence.

In section 4.1, page 40, the GPS refers to alternative and additional approaches to funding land transport investment. Our members would be receptive to a user pay model – providing that the funds raised were hypothesized to that specific project, and that there were clear timelines as to the length of their commitment to the user pays model. Targeted rates, such as congestion charges, and toll roads, have also been discussed with our members historically. Based on the above parameters, there was support for those also. The key message from business is that those with a direct benefit should be expected to contribute.

Activity Class Framework, Section 3.2

Business North Harbour acknowledges the government's drive towards public transport, safety, walking and cycling, regional improvements, and the shift of investment away from state highway improvements.

Our members recognise the benefits an effective public transport can deliver. They will welcome the investment in public transport networks as the current public transport network connections do not provide their employees commuters with a resilient, reliable and sustainable alternative to the single occupancy vehicle commute.

However, our members have expressed concern as to the bias given to walking and cycling modes, which is higher than transitional rail.

Submit your feedback on the draft GPS 2018 so it is received by MoT at **5pm on 02 May:**

- Email to the GPS mailbox gps2018@transport.govt.nz
- Or post to: Attn. GPS Policy team
Ministry of Transport
P.O Box 3175
WELLINGTON 6140

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

<http://www.nzta.govt.nz/projects/awhc/>

ⁱⁱ Draft Government Policy Statement on Land Transport: 2018/19 – 2027/28 Section 2.4, 118

⁷ Draft Government Policy Statement on Land Transport: 2018/19 – 2028/29, page 30