



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

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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