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cc

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## **SUBMISSION TO THE DRAFT REGIONAL LAND TRANSPORT PLAN 2021-2031 AND REGIONAL FUEL TAX**

The Rosebank Business Association ('Association') - 'Rosebank – Gateway to the West' - welcomes the opportunity to make this submission to the draft Regional Land Transport Plan ('RLTP').

The Rosebank Business Improvement District is a commercial and industrial hub of 650 + businesses located on the Rosebank Peninsula in West Auckland. It has direct access to the SH16 North-Western Motorway and when the Waterview tunnel was completed, it's traffic count increased to between 25 and 35,000 vehicles per day with immediate access and link to the SH20 Airport Motorway. Businesses in the area generate an estimated \$1 billion in revenue, pay significant rates and employ about 9,000 FTEs. The predictions are that this workforce will increase to 20,000 by 2035.

Of critical importance to the Association and its members is transport through the Rosebank business precinct, with the efficiency and effectiveness of Rosebank and Patiki Roads (and their connections to SH16) being of paramount importance. Also of importance is that the Precinct be well served by public transport.

Our feedback will cover:

- (1) Ongoing concerns regarding the impact of COVID-19
- (2) Summary of our Feedback
- (3) Feedback on the Regional Land Transport Plan
- (4) Feedback on the Regional Fuel Tax
- (5) Climate Change
- (6) Rosebank Priorities

### **(1) Ongoing concerns regarding the impact of the COVID-19**

We have ongoing serious concerns expressed from our local business members that COVID-19 is having a significant impact on their businesses.

The impacts include direct financial impacts on businesses (especially hospitality businesses), supply chain and market disruption as well as effects on production. More particularly, COVID-19 has had major impacts on exporters to China and those relying on international visitors and students. For hospitality and events organisers, the ongoing lockdowns have been devastating. Many

firms relying on imported intermediate or final inputs from China are also being affected, particularly in manufacturing. Small and medium-sized businesses have had their business models turned upside down. Businesses tied to travel, tourism and hospitality have experienced losses that will not be recoverable. We still do not know how long this will continue. We have lost many businesses already, with the outlook for some businesses now dire.

We have welcomed the responses from Mayor Phil Goff through the crisis, especially the need to respond calmly, but we ask for more focus in the RLTP on that can be taken to assist businesses.

## **(2) Summary of our Feedback**

Your on-line form sets out two key questions relating to the Draft Regional Land Transport Plan and the Regional Fuel Tax ('RFT').<sup>1</sup> Our feedback on these questions is set out below. In summary:

- we agree that rapid population growth in Auckland has brought with it significant transport challenges and we support the focus in your proposals on public and active transport, which will free up road capacity;
- our preference is that demand management of our existing transport network be a key solution (following 'user pays' approaches, such as congestion charging);
- while we support a regional fuel tax as an interim solution, the tax is placing a further financial burden on business and we are concerned it is being underspent;
- we hold concerns that the significant works planned (such as cycleways), will result in harmful disruption to businesses and we ask that any disruption be properly mitigated (and transparently funded)
- road corridor improvements together with enhancing network capacity are a priority for us to make better use of the existing transport network and increase travel times through key routes and corridors for freight and business-related transport.

## **(3) Feedback on the Draft Regional Land Transport Plan**

*Your on-line consultation says that Auckland is growing and our transport system faces significant challenges now and into the future. To meet the directives set by central and local government policies and strategies, the draft RLTP aims to contribute solutions to the following challenges: climate change and the environment; travel choices; safety; better transport connections and roading; Auckland's growth; and managing transport assets.*

While we agree overall with the challenges you have identified (climate change, travel choices, better transport connections and roading, Auckland's growth and managing transport assets), we believe improving network capacity and performance by making the most of the existing transport system is key to addressing Auckland's growth and managing transport assets.

We must focus on optimising the transport network through targeted changes, such as improving the coordination of traffic lights, the use of dynamic lanes at peak times, and removing bottlenecks to mitigate congestion. Maximising the benefits from new technology and taking opportunities to influence travel demand are also important, as well as introducing pricing to address congestion as soon as possible. Improving network capacity and performance to addressing Auckland's growth and better manage our existing transport assets are our highest priority transport challenges, followed closely by the other factors outlined in the Plan.

With regard to your specific questions -

- We do not think you have correctly identified the most important transport challenges facing Auckland because you have not prioritised these challenges from the perspective of small and medium sized businesses;
- Addressing Auckland's growth and better managing our existing transport assets are our highest priority transport challenges, followed closely by the others outlined in the Plan (climate change & the environment, safety, travel choices, better public transport connections and roading, and walking and cycling);

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<sup>1</sup> [https://akhaveyoursay.aucklandcouncil.govt.nz/regional-fuel-tax/survey\\_tools/have-your-say](https://akhaveyoursay.aucklandcouncil.govt.nz/regional-fuel-tax/survey_tools/have-your-say)

- We think congestion charging is a very important policy change and removing the Fringe Benefit Tax for employers who subsidise public transport for their employees an important policy change to deliver an effective and efficient transport system (followed closely by road safety policy changes, environment and climate change policies).

### **(3) Feedback on the Regional Fuel Tax**

*Your on-line consultation says that a key source of funding for transport projects in Auckland is the Regional Fuel Tax (RFT). You say that Auckland Council is proposing to change details of projects funded in their current RFT scheme in response to funding decisions made by the government and to align with the draft RLTP. The amount of fuel tax is not planned to change.*

Our preference is to introduce initiatives that both manage demand and raise funding equitably as soon as possible, balanced with investment into affordable and more frequent public transport in order to effect sustainable behavioral change. We support the technical work on 'The Congestion Question' project that has been examining the potential to apply congestion charging in Auckland. In particular, we support the technical work on the introduction of congestion pricing when the CRL opens and the delivery of productivity benefits for the freight industry.

In the interim, while we have supported a regional fuel tax of 10 cents per litre (plus GST), we ask for greater transparency regarding the spending of this tax on specific transport projects and services. We wish to avoid the regional fuel tax, which is the equivalent of a significant rates increase (especially for transport operators), being used as a 'top up' for overall transport budgets. We ask that wasteful spending be cut and operational efficiencies be found to reduce the size of the regional fuel tax.

We are also concerned about the ongoing underspend of the Regional Fuel Tax.<sup>2</sup> We are worried that businesses are being over-taxed with the RFT is being underspent or that infrastructure is not being built at the required pace.

### **(5) Climate Change**

We note the RLTP's emphasis on climate change with actions like electrification of the rail line to Pukekohe, increasing the number of electric/hydrogen buses, de-carbonising the ferry fleet and supporting the uptake of electric cars

We are involved with a variety of initiatives relating to climate change, such as supporting mode shift in transport, encouraging electrification of the vehicle fleet and sustainable waste initiatives.

As the majority of businesses in our precinct are small to medium sized. We would welcome more initiatives to support these businesses to make the necessary changes. Funding for business education on low carbon transport options is particularly important to raise awareness and drive change.

### **(6) Rosebank Priorities**

With specific reference to the Rosebank Peninsula, we ask that urgent consideration be given to the points below.

#### *Rosebank and Patiki Road Corridor Improvements*

Of considerable concern to the Association is that the draft RLTP 2021-2031 has no provision for a Rosebank Road upgrade (that is, upgrading the existing Rosebank Road to improve vehicle and freight access to and from State Highway 16). This was at least costed in the last RLTP 2018-28 (at \$36M, but unfunded).<sup>3</sup>

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<sup>2</sup> <https://www.nzherald.co.nz/nz/half-of-auckland-councils-regional-fuel-tax-has-not-been-spent/XTFNMMLCAPDH4HFFBQQKUSUIN4I/>

<sup>3</sup> See *Draft Regional Land Transport Plan 2018-28*, p. 69.

<https://at.govt.nz/media/1977374/rltp-consultation-single-pages-small.pdf>

This is contrary to the emphasis in the RLTP on road corridor improvements to address congestion on the arterial network, especially congestion on the freight network.<sup>4</sup> It is also contrary to the need for network capacity and performance improvements, so that better use is made of the existing transport system to increase the number of people who can travel through key routes and corridors. This must include the efficiency and coordination of traffic signals being improved to enhance throughput and reduce delays as well as the introduction of more dynamic traffic lanes to improve peak traffic flows, and give priority to freight movements on key freight connections.<sup>5</sup>

In particular, the Association wishes to see real improvements for Rosebank in terms of traffic management. One issue of importance is for Auckland Transport and Auckland Council to make a decision about road widening. We understand that the ordinance for this is in place. While this would require removal of the flush median, we feel this option has come to the end of its useful life. At peak traffic times the pace of traffic is very slow. Even outside these hours, traffic travels at around 40km/hr. The ability to exit driveways is now almost impossible without taking risks. Our view is that this must be resolved. There may also be opportunities for safety signage to be displayed in the immediate term. We also ask for a genuine extra northern lane in Patiki road be created to help alleviate the Rosebank roundabout congestion, which proceeds down to the motorway via the ramp metering process. We ask for urgent and serious consideration being given to the introduction of a dynamic traffic lane on Patiki Road to improve peak traffic flows.

**The Association asks that the Rosebank Road upgrade signalled in the 2018-2028 RLTP (upgrading the existing Rosebank Road to improve vehicle and freight access to and from State Highway 16 costed at \$36M) be funded in this RLTP period from 2021-2031.**

#### *Public Transport – Light Rail on Northwest Corridors*

On the issue of public transport, the Association has supported and promoted the new 138 AT bus-link from New Lynn via Rosebank to Henderson and its return. The Association would like to work with Auckland Transport to ensure public transport to and through Rosebank is efficient and effective.

Also on public transport, we note the introduction of a new bus network for West Auckland. There are over 8,000 FTEs working in Rosebank and the second largest secondary school in NZ, Avondale College, is close by. The new bus network must link with the Avondale Train network.

However, of most significance is the proposal for the Northwest Bus Improvements along SH16. The RLTP notes that the Northwest Bus Improvements is proposed to the north-west to support substantial growth along the corridor and in the broader North West, to address the projected decline in employment access, to provide a travel alternative to congestion on State Highway 16, and to improve public transport mode share. It will involve a bus station at Westgate and interim bus stops at Lincoln Road and Te Atatu motorway interchanges. This will be delivered with part-funding from the COVID Response and Recovery Fund.

An ongoing concern we have is that there is no bus station at Rosebank, despite the need to address the projected decline in employment access.

**The Association asks that the proposal for Northwest Bus Improvements along SH16 include a station to service the Rosebank employment area.**

If you have any questions or would like to discuss this further, please feel free to contact us.

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<sup>4</sup> See Draft Regional Land Transport Plan 2021-31.

<sup>5</sup> See Draft Regional Land Transport Plan 2018-28, page 40.

**Conclusions**

Finally as we enter another very uncertain year, especially for small and medium sized businesses, we ask that the approach to the draft RLTP focus more on how transport initiatives can grow the economy and support job creation.

Yours sincerely,



Mike Gibson  
CEO  
Rosebank Business Association