

I hereby give notice that an extraordinary meeting of the Transport and Infrastructure Committee will be held on:

Date: Wednesday, 27 March 2024
Time: 10.00am
Meeting Room: Reception Lounge
Venue: Auckland Town Hall
301-305 Queen Street
Auckland

Komiti mō ngā Tūnuku me ngā Rawa Tūāhanga / Transport and Infrastructure Committee

OPEN ADDENDUM AGENDA

MEMBERSHIP

Chairperson	Cr John Watson	
Deputy Chairperson	Cr Christine Fletcher, QSO	
Members	Cr Andrew Baker	Cr Mike Lee
	Cr Josephine Bartley	Cr Kerrin Leoni
	Houkura Member Billy Brown	Cr Daniel Newman, JP
	Mayor Wayne Brown	Houkura Member Pongarauhine Renata
	Cr Angela Dalton	Cr Greg Sayers
	Cr Chris Darby	Deputy Mayor Desley Simpson, JP
	Cr Julie Fairey	Cr Sharon Stewart, QSM
	Cr Alf Filipaina, MNZM	Cr Ken Turner
	Cr Lotu Fuli	Cr Wayne Walker
	Cr Shane Henderson	Cr Maurice Williamson
	Cr Richard Hills	

(Quorum 11 members)

Lata Smith
Senior Governance Advisor
26 March 2024

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Auckland Council submission in response to the Draft Government Policy Statement on Land Transport 2024

File No.: CP2024/02924

Item 7

Te take mō te pūrongo

Purpose of the report

1. To whakaae / approve Auckland Council's submission in response to the Draft Government Policy Statement on Land Transport 2024 (GPS).

Whakarāpopototanga matua

Executive summary

2. The Ministry of Transport has released a new draft of the Government Policy Statement on Land Transport 2024 (draft GPS 2024) for public consultation, replacing the draft GPS 2024 released in August 2023. There are many significant differences between this version and the draft released last year.
3. The GPS sets out the government's land transport strategy and priorities for the next decade and is updated every three years. It outlines what the government expects to achieve in land transport, along with how much funding will be provided and how this funding will be allocated across the different aspects of the land transport system.
4. A key focus of the draft GPS 2024 is the government's direction on how \$20 billion in funding from the National Land Transport Fund (NLTF) will be allocated over the next three years. Funding allocations are shaped by the government's four strategic priorities: economic growth and productivity; increased maintenance and resilience; safety (particularly policing and enforcement); and value for money.
5. The proposed funding allocations in the draft GPS 2024 are across 12 activity classes. In combination with a much more directive approach to how funds in certain classes are to be used, funding will increase for the construction and maintenance of state highways and local roads, while effectively decreasing funding for several other aspects of the land transport system, including walking, cycling, public transport, rail services and, potentially, infrastructure-based interventions focused specifically on improving safety.
6. Auckland Council's draft submission (Attachment B) supports the GPS where there is alignment with its own strategic documents. It notes Council's broad support for many of the strategic priorities and in particular its focus on enhancing economic growth and productivity. Amongst other things the submission also expresses council's support for many of the reforms proposed for the transport funding and planning system, the increase in funding for road maintenance, increased focus on enforcement to improve safety and the increased focus on improving efficiency of freight movements.
7. The draft submission also highlights a number of gaps in the draft GPS 2024. Chief amongst these is the document's failure to address the need for partnership between government and Auckland Council or make any reference to a potential Integrated Transport Plan (ITP). The draft submission recommends that the GPS include a commitment to work with Auckland Council on an ITP to provide an aligned and integrated policy and investment strategy, committed to by all parties that is appropriately funded. It further recommends that the GPS be more explicit about the fact that Auckland is different to much of the rest of the country and the interventions required to support economic growth often differ from those that are effective in less urbanised areas.

8. The draft submission expresses particular concern about the proposed cut in funding for public transport services and infrastructure. The funding allocations set out in the draft GPS 2024 will require Auckland Transport to significantly increase fares and reduce service levels, potentially leaving entire suburbs without a public transport service. Council also has key concerns around the lack of focus on mitigating the climate and environmental impacts of the transport system, the lack of reference to the importance of working with Māori, the reduced funding for active modes, the move away from a safe system approach to road safety and the challenges some of the proposals will create for the delivery of multi-modal infrastructure improvements.
9. Following the Transport and Infrastructure Committee workshop on 20 March 2024 a draft of the submission was sent to elected members and Houkura members on Friday 22 March. Feedback was received from a number of councillors and staff have made changes to the draft accordingly and as best as they were able. These changes are highlighted in Attachment B.
10. This report seeks approval of the final submission from the Transport and Infrastructure Committee.

Ngā tūtohunga Recommendations

That the Transport and Infrastructure Committee:

- a) whakaae / approve the Auckland Council group submission to the Draft Government Policy Statement on Land Transport 2024, contained as Attachment B, inclusive of any minor edits and corrections.

Horopaki Context

11. The Ministry of Transport released a new draft of the GPS 2024 on 4 March 2024 for public consultation, replacing the draft GPS 2024 released in August 2023. Submissions close at midday on 2 April 2024.
12. The GPS is a statutory document which the government must update at least once every three years. It outlines what the government expects to achieve in land transport, along with the level of funding that will be provided and how funding from the NLTF will be allocated across the different aspects of the land transport system. The GPS also includes information on the Government's strategic priorities and Ministerial expectations regarding land transport funding.
13. Expenditure targets and funding ranges for various activity classes are specified for the first six financial years of the GPS's timeframe, and these are supplemented by forecast funding ranges for the following four financial years, creating a ten-year pathway for how funding from the NLTF will be allocated.
14. The GPS has a significant impact on all aspects of New Zealand's transport system, as it sets the parameters through which NLTF funding can be accessed. It therefore directs NZTA funding decisions via establishing funding ranges for different transport activities (known as activity classes).
15. As most transport investments by local authorities, such as Auckland Transport, receive co-funding from the NLTF, the GPS has a strong influence on transport decisions at the regional level as well as the national level. Additionally, Regional Land Transport Plans (RLTP) must be consistent with the GPS and the purpose of the Land Transport Management Act 2013; "an effective, efficient and safe land transport system in the public interest".

16. Auckland Council provided a submission on the previous draft GPS 2024 released by the previous government prior to the 2023 general election, which was broadly supportive of its overall strategic priorities. It raised concerns that the document did not provide Auckland with an adequate share of transport funding, did not address the broader funding challenges facing the transport system and had not been prepared with sufficient consultation with Auckland Council.
17. This is the second draft of the GPS 2024. There are a number of significant differences between this draft GPS and the earlier version.

Tātaritanga me ngā tohutohu Analysis and advice

18. The Government's four strategic priorities outlined in the draft GPS 2024 are economic growth and productivity, increased maintenance and resilience, safety and value for money.
19. For each of the strategic priorities, the draft GPS 2024 includes a list of short to medium-term outcomes that the Government expects to achieve through their investment in land transport. There is an expectation that the National Land Transport Plan (NLTP) 2024-27 and the corresponding RLTPs will prioritise projects and activities that align with the Government's strategic priorities by contributing to the expected outcomes listed in the draft GPS 2024.
20. The draft GPS 2024 also includes a list of Ministerial expectations which provide further direction on how the Minister of Transport intends for NZTA to give effect to the GPS.
21. Section 5 of the draft GPS 2024 states that the Minister of Transport expects:
 - a focus on delivery
 - a focus on core business
 - a focus on value for money
 - consideration of other revenue sources and other funding and delivery models
 - increased focused on performance and efficiency
 - NZTA to ensure that Road Controlling Authorities are following the Ministerial expectations in the GPS.
22. Under the LTMA, these expectations specifically apply to NZTA, although the draft GPS 2024 notes that 'most of the expectations also apply to other players in the sector including the Ministry, local government and other delivery agencies.'
23. Many aspects of these Ministerial expectations align well with existing Auckland Council policy. The instruction to NZTA to develop more efficient business case processes by the end of 2024, for example, may lead to a less onerous funding application process and faster decision making. This would align well with Auckland Council's proposed 2023 legislative changes to transport governance and echoes the recommendation in Auckland's Transport Emissions Reduction Pathway (TERP) for reform of the transport planning system.

Auckland Council Submission

24. The draft submission notes that Auckland Council broadly supports many of the strategic priorities highlighted in the new draft GPS 2024. It raises concerns, however, that some of the specific proposals could have unintended consequences which may worsen Auckland's current transport issues. For example, a proposed reduction in funding to the Public Transport Services activity class will require Auckland Transport to significantly increase fares and enact severe cuts across the public transport network. Reductions in funding or new restrictions on funding for public transport infrastructure, rail network, walking and cycling and safety are also not supported.

25. The draft GPS 2024 makes no mention of a potential ITP or any kind of partnership with Auckland. Effective collaboration and joint decision-making involving both Auckland Council and central government will be essential for the region's success and its contribution to New Zealand's economy. The draft submission notes that we would like to see the government use the GPS to commit to working with council on an ITP for Auckland to provide an aligned and integrated policy and investment strategy, committed to by all parties that is appropriately funded.
26. Transport represents one of the biggest challenges facing Auckland. Integrated multi-modal planning is the pathway to successful transport outcomes and it is essential that the GPS facilitates this. The current transport funding and governance systems do not work for Auckland and Auckland Council does not have the tools to address these issues ourselves. The submission therefore supports many of the reforms to the transport planning and funding system proposed in the draft GPS.
27. The submission emphasises the need to fulfil Te Tiriti o Waitangi obligations through meaningful engagement with Māori and a commitment to improving Māori outcomes. These are entirely absent from the draft GPS 2024.
28. Concern was expressed that the draft GPS 2024's approaches to reducing emissions, improving transport safety and facilitating multi-modal transport planning do not align with Auckland Council's established approaches to these issues. While the government's approach to reducing transport emissions by relying primarily on price signals sent via the Emissions Trading Scheme is acknowledged, the draft submission argues that a continued focus on mode shift is also required to cut emissions significantly.
29. Several proposed changes to funding are signalled in the draft GPS 2024, including strict new directives around which activities can be funded from each activity class, which risks creating significant cost inefficiencies and administrative burden for Auckland Transport.
30. Auckland Council is still working to understand the impact of debt instruments and other repayments on the overall funding available in the activity classes. Once debt is taken into account, the actual allocations that are practically available may be closer to the bottom of the activity class bands which would impact funding availability in key areas.
31. The draft GPS 2024 proposes a reduction in funding for the Public Transport Services and Infrastructure activity classes. This would have significant adverse impacts on the operation of Auckland's public transport system and affect Auckland Transport's ability to maintain existing services and deliver planned improvements, and the ability to invest in public transport infrastructure.
32. The direction that all active modes investment must come from the Walking and Cycling activity class is likely to mean an effective significant decrease in funding availability relative to demand for funding. This activity class is likely to be heavily oversubscribed nationally, in terms of committed projects and maintenance and renewals, which means there will likely be very little funding available for new projects. This will be exacerbated by the fact that the funding range is halved after year one and, unlike all other activity classes, is not adjusted for inflation in subsequent years.
33. The proposed prohibition on the use of funds from the dedicated Safety activity class for infrastructure-based safety improvements could lead to a significant decrease in available funding for projects focused on improving transport safety. The strict new requirements around what safety interventions will be funded from various activity classes will limit our ability to provide fit for purpose, evidence-based responses to community concerns and crash risks.
34. A list of the recommendations from the draft submission are attached as Appendix A.

Tauākī whakaaweawe āhuarangi Climate impact statement

35. Making a submission to Government on the draft GPS 2024 has no direct climate impacts.
36. The GPS, its priorities and its consequential setting of parameters through which NLTF funding can be accessed does, however, have a direct impact on transport emissions. The GPS can enable either an increase or decrease in transport related emissions over time.
37. Emissions from transport is the biggest contributor to Auckland's emission profile – it makes up 43 per cent of Auckland's emissions. Investment in the land transport system in Auckland therefore plays a significant role, possibly the most significant, in enabling Auckland to achieve its own emission reduction targets, as well as contribute to national emission reduction targets. The draft GPS 2024 states there will be a shift away from direct transport decarbonisation initiatives towards a greater reliance on the Emissions Trading Scheme.
38. As the draft GPS 2024 is a statement of intent at this stage (with no actual funding allocations or investment decisions) it is not possible to estimate its climate impacts in terms of either emissions or resilience. The concern is that the GPS will not support mode shift sufficiently to enable significant progress toward the government and Auckland Council's climate goals.

Ngā whakaaweawe me ngā tirohanga a te rōpū Kaunihera Council group impacts and views

39. Making a submission to Government on the draft GPS 2024 has no direct impacts on the council group.
40. The GPS 2024 will however have major impacts on Auckland Transport. Several proposed changes to funding are signalled in the draft GPS 2024, including strict new directives around which activities can be funded from each activity class, which risks creating significant cost inefficiencies and administrative burden for Auckland Transport.

Ngā whakaaweawe ā-rohe me ngā tirohanga a te poari ā-rohe Local impacts and local board views

41. An information memorandum, outlining the purpose and function of a GPS as well as the content of the draft GPS 2024 was provided to Local Boards on 12 March 2024.
42. Local Boards were invited to provide their feedback on the draft GPS to council by Tuesday 26 March. This feedback will be attached to the Auckland Council submission.

Tauākī whakaaweawe Māori Māori impact statement

43. Staff wrote to Mana Whenua and Mataawaka on 12 March 2024, providing them with an information memorandum outlining the purpose and function of a GPS and content of the draft GPS 2024 and inviting them to provide input into Auckland Council's submission. No feedback from Mana Whenua and Mataawaka was received.
44. The draft GPS 2024 does not mention Māori outcomes or engagement with Māori. The draft submission recommends that the GPS specifically reference the need for engagement with Māori across the transport sector and that it includes a focus on enhancing Māori outcomes and improving transport equity.

Ngā ritenga ā-pūtea Financial implications

45. There is no financial implication from making a submission on the draft GPS 2024.
46. The proposed funding allocations in the draft GPS 2024 are across 12 activity classes. In combination with a much more directive approach to how funds in certain classes are to be used, funding will increase for the construction and maintenance of state highways and local roads, while effectively decreasing funding for several other aspects of the land transport system, including walking, cycling, public transport, rail services and infrastructure-based safety interventions.
47. These changes will significantly impact AT's ability to deliver on many of its planned projects, particularly public transport. This is discussed in full in the funding section of the draft submission.

Ngā raru tūpono me ngā whakamaurutanga Risks and mitigations

48. There are a number of significant risks associated with the draft GPS 2024 in relation to the Auckland Council Group's ability to deliver on a wide range of transport and land use projects and initiatives. These will need to be worked through as the GPS is finalised and given effect to through various transport planning processes in years to come.
49. The draft submission includes a recommendation to the government that it work closely with Auckland Council to support more integrated, joint decision making. It recommends an ITP to provide an aligned and integrated policy and investment strategy as a means of mitigating the negative impacts of the draft GPS 2024.

Ngā koringa ā-muri Next steps

50. Should the Transport and Infrastructure Committee approve the final submission, the submission will be dispatched to meet the submission period deadline.

Ngā tāpirihanga Attachments

No.	Title	Page
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B	DRAFT Auckland Council Submission on the Draft GPS Land Transport 2024	13

Ngā kaihaina Signatories

Authors	Robert Simpson - Manager Transport Strategy Elise Webster - Principal Transport Advisor
Authorisers	Jacques Victor - General Manager, Auckland Plan Strategy and Research Megan Tyler - Chief of Strategy Barry Potter - Director Infrastructure and Environmental Services

Draft Submission on Draft GPS 2024 - Specific Recommendations

Integrated Transport Plan:

- i) We recommend the inclusion in the GPS of a government commitment to joint transport planning with Auckland Council in the form of an ITP that will determine key investment priorities.
- ii) We recommend that the ITP is the appropriate place to select and prioritise major projects in Auckland rather than the GPS.

Safety:

- iii) We recommend that the GPS continue to focus on the Safe System approach as a critical component of improving safety on the transport network.
- iv) We support the focus on policing and education, although recommend that this be augmented by a focus on other critical aspects of the road safety programme.

Value for Money:

- v) We recommend that requirements to sharply increase farebox recovery within a constrained time period be avoided.
- vi) We recommend that no changes to funding directives be introduced which risk creating significant cost inefficiencies and administrative burden.
- vii) We support the proposals for increasing value for money, including implementing dynamic lanes to get the most out of existing assets, the roll-out of time-of-use charging to manage demand and a focus on reducing the amount spent on temporary traffic management.

Māori Outcomes:

- viii) We recommend that the GPS specifically reference the need for engagement with Māori across the transport sector, in line with legislative obligations to Te Tiriti o Waitangi under the Local Government Act (2002).
- ix) We recommend that the GPS include a focus on enhancing Māori outcomes and improving transport equity.

Climate:

- x) We recommend that the GPS provide the transport sector with a clear approach to reducing its emissions which does not rely primarily on the ETS.
- xi) We recommend that in conjunction with pending changes to the ETS, a focus on mode shift continue to be maintained in order to achieve significant reductions in transport emissions.
- xii) We recommend that the approval process for potential transport investments includes an assessment of their whole of life emissions impacts and their contribution to government's climate goals.

Multi-modal Transport Planning:

- xiii) We recommend that the current system enabling flexibility between activity classes be maintained to ensure the efficient delivery of projects, renewals and maintenance.
- xiv) We recommend that, should a mode specific approach to cost allocation be implemented, changes are made to the guidelines requiring NZTA to minimise the administrative burden created by the change;

and allow NZTA to set a reasonable threshold for requiring the splitting of costs to avoid significant time and effort being expended chasing insignificant cost savings.

Public Transport Services:

- xv) We recommend that sufficient funding be allocated to the activity class to enable AT to maintain existing services and deliver planned improvements, including new services that leverage infrastructure investment.
- xvi) We recommend that any changes to funding should avoid requiring substantial fare increases beyond usual annual adjustments.

Public Transport Infrastructure:

- xvii) We recommend that sufficient funding be allocated to this activity class to enable the delivery of AT's planned public transport improvements and other key public transport throughout New Zealand.
- xviii) We recommend that major rapid transit projects such as Northwest Rapid Transit be funded from outside this activity class, given they have the same level of significance to New Zealand as the RoNS.

Road Maintenance and Improvements:

- xix) We support increased funding for local road and State Highway maintenance.
- xx) We recommend that any proposed changes to how maintenance is funded should avoid the risk of unintended consequences, cost inefficiencies & increased construction disruption.
- xxi) We emphasise that the appropriate place to select and prioritise major projects in Auckland is through the development of a future Auckland Integrated Transport Plan.

Rail Network:

- xxii) We support the statement that completing Auckland's rail network rebuild is a priority for Government.
- xiii) We recommend that sufficient funding be provided to support the operation and maintenance of Auckland's passenger & freight rail networks, and minimise risk of avoidable disruptions in the future.

Walking and Cycling:

- xiv) We recommend that sufficient funding be provided to enable provision for walking and cycling on new roading infrastructure as well as low cost improvements to close gaps in the existing network.
- xv) We recommend maintaining the current approach to funding maintenance of walking and cycling infrastructure.

System Reforms:

- xvi) We support, in principle, the following proposed system reforms, subject to more detail being provided:
 - reducing the complexity of NZTA business case approval processes.
 - tolling for new roads.
 - investigating new forms of funding and financing for large projects.
 - reducing traffic management costs.
 - improving efficiency across the sector.
 - overhauling the transport revenue system including enabling time-of-use charging.
 - longer-term transport planning processes including a national 30-year infrastructure plan.



2 April 2024

Ministry of Transport
3 Queens Wharf
Wellington 6011

Sent via email to gps@transport.govt.nz

Auckland Council's submission on the March 2024 consultation draft of the Government Policy Statement on Land Transport 2024

Thank you for providing Auckland Council with the opportunity to submit on the March 2024 draft of the Government Policy Statement on Land Transport 2024. The Auckland Council Group submission has been approved by Auckland Council's Transport and Infrastructure Committee and incorporates the views of Auckland Council and Auckland Transport.

Local Board submissions on the discussion document are appended to the Council's submission.

Please contact Elise Webster, Principal Transport Advisor (elise.webster@aucklandcouncil.govt.nz), if you have any queries regarding Auckland Council's submission.

Ngā mihi,

Cr John Watson

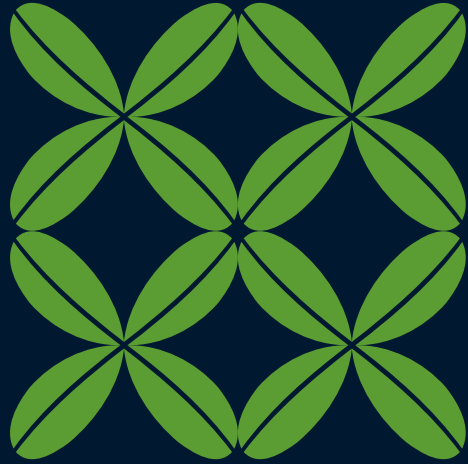
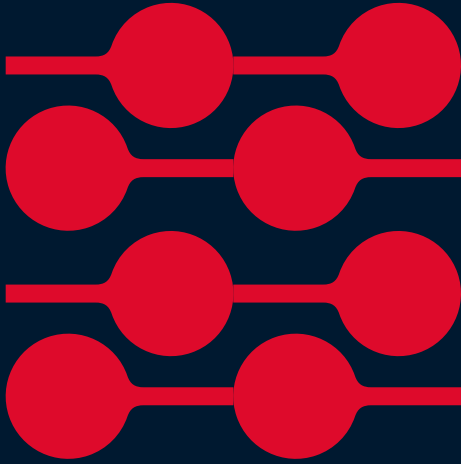
Chair of the Transport and Infrastructure Committee

Cr Christine Fletcher

Deputy Chair of the Transport and Infrastructure Committee

Item 7

Attachment B



**Auckland Council's
Submission on the
Draft Government
Policy Statement on
Land Transport 2024**



2 April 2024

aucklandcouncil.govt.nz



Mihimihi

Ka mihi ake ai ki ngā maunga here kōrero,
ki ngā pari whakarongo tai,
ki ngā awa tuku kiri o ōna manawhenua,
ōna mana ā-iwi taketake mai, tauivi atu.
Tāmaki – makau a te rau, murau a te tini,
wenerau a te mano.
Kāhore tō rite i te ao.

*I greet the mountains, repository of all that
has been said of this place,
there I greet the cliffs that have heard the
ebb and flow of the tides of time,
and the rivers that cleansed the forebears of
all who came those born of this land
and the newcomers among us all.
Auckland – beloved of hundreds, famed
among the multitude, envy of thousands.
You are unique in the world.*

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Executive Summary

Auckland needs an effective transport system to support the success of both the region and New Zealand as a whole. Many things have changed since the previous edition of the Government Policy Statement on Land Transport (GPS) was released, including a new Government, but the fundamental challenges and pressures facing Auckland's transport system have generally remained the same.

Auckland is a unique region with 33% of the country's population, 38% of the country's GDP and a very significant share of the nation's transport challenges. Effective collaboration and joint decision-making involving both Auckland Council and central government will be essential for the city's success and its contribution to New Zealand's economy. We therefore recommend that the Government use GPS 2024 to commit to working with Auckland Council on an Integrated Transport Plan (ITP) for Auckland.

Transport represents one of the biggest challenges facing Auckland. Addressing this will require different approaches to the past; there is a need for significant change in how both transport and land use are planned. The pathway to successful transport outcomes is integrated multi-modal planning and it is essential that the GPS facilitates this. It is abundantly clear that the funding and governance systems for transport are broken and need to be fixed at a national level. Auckland Council is not currently empowered with the necessary tools to address these issues ourselves.

Through this submission, Auckland Council seeks to advocate for what's best for Auckland, but we recognise that some aspects of the draft GPS that we have concerns with may nonetheless represent the best approach for other parts of the country. We don't expect the entire GPS to be framed around Auckland's needs, but nor is it acceptable that the needs of Auckland are overlooked. This is why we strongly emphasise the need for the ITP, to recognise and respond to the unique transport needs of New Zealand's largest city. We do not seek to litigate matters that are best decided through the ITP in this submission, but it is important that the GPS appropriately facilitates the development of this plan.

Auckland Council broadly supports many of the strategic priorities highlighted in the draft GPS, including a strong focus on economic growth, more emphasis on maintenance and recognition of the need for a pivot towards long-term proactive transport planning and decision-making. We emphasise the need for pragmatic, evidence-based approaches to delivering on these strategic priorities.

We are, however, concerned about overall funding levels proposed in the activity classes. We recognise that funding was constrained before this GPS, but note that some activity class decisions appear likely to exacerbate issues. In particular, we are concerned about the proposed reduction in funding for the Public Transport Services activity class. If this is funded at the lower end of the band, AT may need to significantly increase fare costs and/or reduce services, by up to 30 percent. This would likely lead to increased peak period congestion and may leave entire suburbs without public transport services.

In terms of capital investment, we are concerned that the Public Transport Infrastructure, Local Road Improvements and Walking & Cycling activity classes will only be able to provide around half of the funding AT's programme requires, outside of road surface renewals, over the next three years. This is likely to see major reductions in the scale of AT's programme and a delay in providing the key public transport, walking and cycling infrastructure that Auckland needs. It may also mean that Auckland Council's transport funding is not able to be fully used, missing an opportunity to maximise combined transport investment.

We are also concerned that the draft GPS's approaches to reducing emissions, improving transport safety and facilitating multi-modal transport planning do not align with Auckland Council's established

approaches to these issues. The GPS is a national document, so it is important that it avoids being so prescriptive that effective local solutions to the challenges facing each unique region are precluded or inhibited. Auckland Council also emphasises the need to fulfil Te Tiriti o Waitangi obligations through meaningful engagement with Māori and a commitment to improving Māori outcomes.

Auckland Council looks forward to working closely with the Government to address Auckland's transport challenges and advance our joint transport priorities, particularly through the development of the ITP.

Introduction

1. Auckland Council would like to thank the Ministry of Transport for the opportunity to submit on the draft Government Policy Statement on Land Transport 2024 (draft GPS 2024).
2. This submission has been approved by Auckland Council's Transport and Infrastructure Committee at their meeting on 27 March 2024, and was prepared with input from Elected Members, Houkura, Auckland Council staff, Auckland Transport staff and Auckland Transport's Board of Directors.
3. Throughout this submission, 'Auckland Council' refers to the entire Auckland Council group, including Auckland Council and Auckland Transport (AT).
4. Auckland Council has 21 Local Boards, representing Auckland's diverse urban and rural communities and providing a conduit for local knowledge. Input from a number of Local Boards is included in Appendix Two.

Process

5. Auckland Council is disappointed with the short timeframe provided for consultation on the draft GPS 2024. The GPS is an important strategic document, and the draft GPS 2024 includes proposals which represent substantial changes to how transport is planned, funded and delivered in New Zealand. It is important that feedback from local authorities is given adequate consideration.
6. We are also concerned by the lack of proactive engagement with Auckland Council on several of the major changes proposed in the draft GPS and the lack of recognition of the need for the Integrated Transport Plan (ITP). Combined with the short submission timeframe, this does not reflect the special and important relationship between the government and New Zealand's largest city.
7. Effective collaboration on funding, planning and delivering the proposals in the draft GPS, supported by joint and integrated decision-making between Auckland Council and central government will be essential for making progress of addressing Auckland's transport challenges. A commitment for the Government and Auckland Council to jointly develop an ITP for Auckland is central to this approach.
8. Auckland Council looks forward to working closely with the Government going forward to address Auckland's transport challenges and advance our joint transport priorities.

Structure of the Submission

9. This submission addresses the most significant elements of the draft GPS released on March 4, noting areas where Auckland Council supports, opposes or raises questions with specific proposals. The key recommendations are included in Appendix One.
10. Our submission highlights the need for the ITP, to address many of the concerns Auckland Council has with the draft GPS and to provide a framework for adequately addressing the critical transport

challenges facing Auckland. We do not seek to litigate matters that are best decided through the ITP in this submission, but it is vital that the GPS appropriately facilitates the development of this plan.

11. The submission starts by addressing the strategic elements of the draft GPS, including the four strategic priorities identified by the Government, which we broadly support. It also highlights several important strategic considerations which we believe have been overlooked in the draft GPS, including Māori outcomes, climate considerations and multi-modal transport planning.
12. This is followed by feedback on the proposed changes to funding, encompassing both the funding allocations to the various activity classes, along with proposed directives on how money from certain activity classes can be used. This section includes some of Auckland Council's most acute concerns about the impact of the draft GPS, particular in terms of the need to cut existing public transport services.
13. The submission concludes by providing brief comments on the Government's proposed reforms to the transport planning and funding systems. While more detail is needed to enable a full assessment, Auckland Council welcomes many of these proposed reforms.
14. As noted above, Appendix One includes a list of key recommendations. Appendix Two includes input from Auckland Council's Local Boards.

Auckland's Unique Context

15. Auckland is a unique region with 33% of the country's population, 38% of the country's GDP and a very significant share of the nation's transport challenges. Auckland needs an effective transport system to support the ongoing success of both the region and New Zealand as a whole.
16. Rapid and continuous growth over recent decades has generated significant economic benefits for the entire country and provided a strong stream of tax revenue for central government. However, a failure to support this growth with commensurate levels of investment in the transport system has led to a significant infrastructure deficit, which risks constraining future growth and productivity in the region.
17. Auckland Council is not currently equipped with the tools and powers to address these issues ourselves, but we are often left to deal with the adverse consequences of these prior decisions.
18. Effective collaboration between Auckland Council and central government and joint planning which spans beyond New Zealand's three-year election cycles will be essential for the city's success and its continued contribution to New Zealand's economy.
19. The GPS is a national document that needs to reconcile the needs of the entire country, so it is important that it avoids being so prescriptive that potential solutions to the unique challenges facing Auckland are precluded or inhibited. Instead, we encourage the adoption of a more enabling approach, allowing local authorities to pursue effective and evidence-based approaches to the key challenges facing each region.
20. Through this submission, Auckland Council seeks to advocate for what's best for Auckland, but we are cognisant that different approaches to certain challenges may be needed in Auckland compared to other parts of the country. We don't expect the entire GPS to be framed around Auckland's needs, but nor is it acceptable that the needs of Auckland are overlooked.
21. We therefore recommend that the Government use GPS 2024 to commit to working with Auckland Council on an Integrated Transport Plan (ITP) for Auckland, to demonstrate a commitment to collaboration and to adequately address many of the transport issues facing Auckland that may be too specific to discuss in detail in a national document such as the GPS.

Integrated Transport Plan

22. Auckland's single biggest challenge right now is fixing our transport system to allow people and goods to get around easier. We are planning to spend billions on transport over the next decade, but it won't be enough if we don't make serious, and urgent change to transport planning and governance in Auckland.
23. There is no doubt we need some significant investment. But it needs to be sensible, affordable, and developed in collaboration with Auckland. The Council and the Government must work together to support more integrated, joint decision making for the transport system without changing direction every three years.
24. The draft GPS 2024 makes no mention of a potential Integrated Transport Plan (ITP) or any kind of partnership with Auckland. Every GPS since 2015 has included some kind of recognition of Auckland's unique role in New Zealand and a commitment to a partnership between government and Auckland Council.
25. The absence of this in GPS 2024 partly reflects the fact that the government and council have yet to agree a transport investment programme which has provided a degree of assurance for Auckland funding levels in the past. Nevertheless, Auckland Council recommends the inclusion in the GPS of a commitment to joint transport planning with Auckland Council in the form of an ITP that will determine key investment priorities.
26. The Auckland Integrated Transport Plan needs to provide an aligned and integrated policy and investment strategy. A strategy committed to by all parties that is appropriately funded, and which will include:
 - agreement on priorities for investment.
 - providing for joint decision-making on transport, enabling Auckland Council to exercise greater democratic authority and strategic oversight of transport planning functions.
 - empowering Auckland Council to make decisions about how to charge for transport use in our city.
 - transformation of the fragmented nature of transport governance.
 - a fit for purpose funding model that provides greater flexibility and enables Auckland to fund local projects with its share of the National Land Transport Fund (NLTF), without excessive re-litigation and red tape imposed by the business case process.
27. Our view is that the ITP will enable a holistic view of Auckland's transport needs. Selecting and prioritising major projects is integral to this and is therefore a task we think is best left to the ITP rather than the GPS with its nationwide focus. This process will also be the first essential step towards establishing a future City Deal that can underpin Auckland's future success and that both Auckland Council and Government can support.

Government's Strategic Priorities

Economic Growth and Productivity

28. Auckland Council agrees that supporting economic growth and productivity is an important priority for transport investment and supports its inclusion as a key focus of the GPS.

