

Draft Regional Public Transport Plan 2023-2031

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Government and mana whenua feedback

Auckland Regional Public Health Service

Auckland Regional Public Health Service
Ratonga Hauora-ā-lwi o Tāmaki Makaurau
17 August 2023
Auckland Transport
Submission on the Regional Public Transport Plan 2023-2031 (RPTP)

Thank you for the opportunity for the National Public Health Service, Te Whatu Ora to provide a submission on Auckland Transport's Regional Public Transport Plan 2023-2031 (RPTP). This submission has been written by the Auckland Service (ARPHS). Please refer to Appendix 1 for more information on ARPHS.

We welcome an opportunity to meet with you to discuss our submission.

Thank you for the opportunity to comment on the Regional Public Transport Plan 2023-2031 (RPTP).

ARPHS supports the actions outlined in the RPTP that create a shift towards public and active transport modes. Our support is due to the substantial impact transport has on health and wellbeing. Some of these impacts are well-recognised, such as preventable injuries and deaths from road crashes, air pollution, noise pollution, and access to good quality services. There are also direct and indirect impacts through the way in which transport and urban design influence physical activity levels, greenhouse gas emissions, social cohesion, social and health inequities, and chronic diseases such as obesity, cardiovascular disease, and respiratory diseases. A well-designed public and active transport system can mitigate these adverse impacts of transport and promote health and wellbeing.

ARPHS commend Auckland Transport (AT) for taking steps towards a multi-modal, healthier, more sustainable transport network through plans like the RPTP. To move away from the legacy of car-focussed design and tackle the pressing social, environmental, economic, and health issues facing the region, we require a significant shift in how Aucklanders move around the city. The RPTP lends a pivotal opportunity for AT to be leaders and innovators in shaping an equitable and prosperous Tāmaki Makaurau through transformational change.

Overall, ARPHS supports the policies and actions contained within the RPTP, particularly in relation to equitable access, multi-modal integration that promotes active transport, and prioritising expanding the rapid transit network. To work towards a future in which all Aucklanders thrive, ARPHS outlines our specific priorities in relation to the RPTP in the enclosed consultation response.

Response to Consultation

Equitable Access to Public Transport

1. Decisions around transport can have a disproportionate impact on people who are transport disadvantaged. The cost of transport is a strong determinant of decisions and travel behaviour, and a significant driver of health inequities related to physical activity, access to services, road injuries and deaths, social cohesion, and exposure to environmental harms. ARPHS support the outcome within Goal 3 to ensure that public transport is affordable for everyone, through the provision of targeted initiatives and concessions.

2. Equitable access to public transport is also determined by the ability for all Aucklanders to travel safely and efficiently to, and use, public transport. ARPHS supports the actions outlined under Goal 3 (viii), especially in relation to ongoing funding of the Total Mobility Scheme and the development of programmes under the Accessibility Action Plan.

Te Tiriti o Waitangi Responsiveness

3. Māori would greatly benefit from a transformational shift in Tāmaki Makaurau's transport system away from car dependency and towards better public and active transport options 1. The provision of sustainable, affordable, safe, high-quality, and equitable transport options can improve Māori economic wellbeing, physical health, and cultural and spiritual connectedness, as well as reduce the inequitable burden of serious injuries and deaths on the roads 2. Achieving these goals requires transformational change across the entire transport network, beyond just targeted initiatives within a system that currently undermines Māori wellbeing. ARPHS recognises that this

level of change requires collective action from a breadth of actors but encourage AT to acknowledge this wider context within the RPTP.

4. ARPHS supports the approach of the RPTP to integrate Te Tiriti o Waitangi responsiveness throughout all goals to ensure that Māori are considered and included in all aspects of PT (public transport) planning and provision.

5. ARPHS supports the monitoring of Māori outcomes across all performance measure as part of AT's commitment to achieving equitable outcomes under Article 3 (Ōritetanga) of Te Tiriti o Waitangi. Honouring Te Tiriti means addressing the inequities that exist within our community as a whole and protecting the wairuatanga of all who call Tāmaki Makaurau home. As such, ARPHS encourages AT to extend the monitoring of equitable outcomes to include other transport-disadvantaged groups, such as Pasifika and disabled people.

Transformational Change

6. It is well accepted that transport system transformation is needed to address climate change and promote population health through the provision of equitable, safe, affordable, and resilient mobility 3. The Auckland Transport Emissions Pathway (TERP) is grounded in this purpose, identifying the significance of this moment and the criticality of transformative change to mitigate the human and environmental impacts of climate change 4. Whilst ARPHS acknowledges that the outlay for transport transformation in Tāmaki Makaurau extends beyond AT's sole responsibility, the RPTP provides a pivotal opportunity to be contribute to this change. ARPHS encourages AT to acknowledge this in the stated purpose and role of the RPTP and take the necessary bold actions to achieve this.

7. ARPHS recommends the introduction of targeted KPIs to measure transformation. Specifically, a KPI for mode shift from private vehicles to public and active transport, and a KPI for the reduction in vehicle kilometres travelled.

8. ARPHS supports the prioritisation of investment in the Rapid Transit Network (RTN) within the RPTP (Goal 1, Actions ii), as a key contributing factor to the transformational change that Tāmaki Makaurau needs.

Integrated Active Transport and Public Transport

9. To promote the health and wellbeing of all Aucklanders, and reduce reliance on private vehicles, it is crucial that the public transport network is integrated with safe and accessible active transport infrastructure. Promoting active transport via changes to the built environment can result in significant public health gains through increasing physical activity, improving mental and social wellbeing, and reducing exposure to greenhouse gas emissions.

10. ARPHS supports the actions under Goal 4 to improve multi-modal infrastructure around the RTN, particularly in relation to active mode access and safety. However, ARPHS are concerned by the de-prioritisation of improvements to pedestrian connections adjacent to the RTN network as a long-term goal. A recent report ranked Tāmaki Makaurau in the bottom 10% of all cities globally for how conducive streets are to a walkable lifestyle 5. Addressing significant severance issues in pedestrian connections near RTN stations in the shorter term will increase the safety and attractiveness of walking to public transport, and further encourage mode shift.

11. ARPHS supports improvements between active modes and public transport; including provision of cycle and micro-mobility parking in more locations and the ability for buses to carry mobility devices and bikes.

Transport Emissions

12. Significant and rapid change is needed in the transport system to achieve Tāmaki Makaurau's climate goals 67. The environmental, societal, and human health costs of transport emissions are well-understood. This includes the direct health impacts of climate change, such as heat-sensitive diseases, changes in patterns of spread of vector-borne diseases, mental illness, undernutrition, respiratory and cardiovascular diseases, and the indirect impacts through changes in the social determinants of health 8. In addition, the health impacts of air pollution caused by vehicle emissions are substantial. In 2016, over half of all Aucklanders (59.4%) were exposed to levels of nitrogen dioxide (NO₂) higher than the current World Health Organization's Air Quality Guidelines, with higher rates for Pacific Peoples (74.5%) 9. These exposure levels were overwhelmingly from vehicle emissions. This is estimated to have caused 685 premature deaths and 3,504 respiratory and cardiovascular hospitalisations in Tāmaki Makaurau, alongside 6,144 new cases of asthma among children. The annual social costs are \$3.2 billion from both the direct hospital costs and restricted activity days where people could not work 8.

13. Meeting the targets of the TERP and mitigating the impacts of transport emissions requires both the provision of high-quality, accessible, affordable public transport that encourages mode shift, combined with a rapid move towards a zero-emissions public transport system. ARPHS supports the actions outlined in Goal 2 to lower emissions and ensure the provision of resilient infrastructure. In particular, the rollout of a zero-emissions bus fleet, prioritising high-use routes, will greatly benefit the health of Aucklanders.

Safe System Approach

14. ARPHS supports the recognition in the RPTP of the importance of safety in relation to public transport services and infrastructure in Tāmaki Makaurau. However, the plan is predominantly focussed on interpersonal safety (Goal 3, Action Area: 'Safety'), and does not adequately address the goals of Vision Zero to reduce the burden of road injuries and deaths, and their inequitable impacts on children, Māori, pedestrians, and cyclists. ARPHS recommend that improvements to, and the further development of, the entire transport network is underpinned by the explicit adoption of a Safe System framework to ensure efficiency is not traded off against safety. We encourage the development of a wellbeing-focussed strategy for the transport system. This would build upon the foundation of Vision Zero to prioritise transport as an enabler of human flourishing in Tāmaki Makaurau.

15. Public transport is a safer mode of travel than private cars and creating a shift to greater public transport use could make a significant contribution to AT achieving its Vision Zero goals. In addition, prioritising investment in safe active transport infrastructure is vital for both real and perceived safety, which must be priority to encourage the use of public transport and prevent injuries. The RPTP would benefit from the explicit recognition of these safety considerations.

16. ARPHS recommends the addition of KPIs to measure progress towards safety goals for public transport and active transport to it.

Indoor Air Quality

17. Whilst the RPTP acknowledges the recent decline in PT patronage, and the confounding drivers of this, it does not currently outline how AT will address safety concerns relating to infectious disease transmission risk. With the established risk of transmission of airborne pathogens in public transport, and loss of patronage since the COVID-19 pandemic, it is important that AT take steps to monitor and communicate air quality in PT and ensure sufficient ventilation and filtration to prevent accumulation of microbial pathogens 10 11.

Quality Urban Design

18. Quality urban design is crucial for the benefits of public transport to be realised. A recent report ranked Tāmaki Makaurau last amongst 10 comparable international cities for the share of people living within a walkable catchment of public transport 12. ARPHS are encouraged by the planned outcomes of Goal 4 to support land development within walkable catchments of the RTN, ensure multi-nodal connections to the RTN, and use public transport as an enabler of quality compact growth.

Conclusion

19. Thank you for the opportunity for ARPHS to provide feedback on the Regional Public Transport Plan 2023-2031.

Appendix 1 – Auckland Regional Public Health Service

Auckland Regional Public Health Service is part of the National Public Health Service (NPHS), Northern region. The NPHS began on July 1 2022 when a new national health service Te Whatu Ora was established under the Pae Ora (healthy future) legislation.

Public health services in Auckland work alongside whānau, iwi, communities and organisations to create and support healthier communities and to reduce or eliminate the cause and spread of infectious diseases. This also means collaborating with communities and those in other sectors to improve the wider determinants that affect people's health, like housing or transport.

Our staff includes medical officers of health, senior medical officers, Māori and Pasifika health experts and cultural advisors, health protection officers, public health nurses, health promoters and those in systems, intelligence and planning roles, and management. We fulfil a range of regulatory roles around alcohol licensing, smokefree compliance, infectious disease management and environmental health.

Kāinga Ora

23 August 2023
Attn: Auckland Transport
Re: Draft Regional Public Transport Plan 2023 – 2031 (RPTP)
Private Bag 92250
Auckland 1142
Feedback sent via email: rptp@AT.govt.nz
Cc: Luke.Elliott@at.govt.nz; anna.jennings@at.govt.nz;
FEEDBACK ON DRAFT REGIONAL PUBLIC TRANSPORT PLAN 2023 – 2031
(RPTP)
FROM KĀINGA ORA – HOMES AND COMMUNITIES

Introduction

Kāinga Ora – Homes and Communities (“Kāinga Ora”) at the address for service set out below provides the following feedback on the Auckland Transport’s (AT) draft Regional Public Transport Plan 2023 – 2031 (RPTP) (“the draft Plan”).

1. Kāinga Ora Homes and Communities was established in 2019 as a statutory entity under the Kāinga Ora-Homes and Communities Act 2019 (“KOHC Act”). Kāinga Ora consolidates Housing New Zealand Corporation (“Housing NZ”), HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown entity and is required to give effect to Government policies.
2. In reviewing and providing feedback on policy documents Kāinga Ora has an interest in how local authorities are supporting integrated urban growth. Kāinga Ora is also the Government’s delivery entity for housing and urban development. Its mandate includes developing and renewing urban environments, plus providing leadership or coordination of urban development.
3. Kāinga Ora also has a direct interest in the success of the draft Plan as the owner and developer of multiple large-scale development projects throughout Auckland. We welcome the AT’s proposals to improve public transport to these areas and have, in some cases, highlighted where further investment may be necessary.
4. Kāinga Ora manages approximately 30,000 existing Auckland homes, housing families (including large numbers of children) and individuals across the region, with public housing being located in all Auckland Council Local Board areas (excluding Great Barrier).
5. Kāinga Ora customers rely heavily on, and require access to, a well-functioning public transport network. Our research (Easy Access to Sustainable Transport - EAST 2022) found that many of Kāinga Ora customers face negative impacts from forced car ownership, including road injuries and increasing costs, with approximately 40% unable to access their everyday needs. One third stated that they would like to travel less by car.
6. The Kāinga Ora Environment Strategy contains a set of Sustainable Transport Outcomes. Kāinga Ora supports reducing the current dependency on private vehicle transport in the right locations. For this to succeed, the streets and public transport systems must prioritise walking, cycling and public transport over car travel and support denser developments close to mixed uses and amenity.
7. Kāinga Ora recognises that the RPTP is a response to the 2021 Regional Land Transport Plan (RLTP). While it is strategic plan with a ten-year focus, Kāinga Ora considers it should also set out a longer term vision beyond 2031. We acknowledge that RPTP has a statutory requirement to be fundable, and request that it explains the need for higher levels of funding for public transport in Auckland.
8. Kāinga Ora would like to work with AT to deliver a range of projects or interventions (e.g. new bus lanes) that overcome existing obstacles to public transport provision and funding, including government policy and funding rules. We also look forward to working with AT to shape the threeyear review of the RPTP in 2026.

Feedback

General Position

9. Kāinga Ora would welcome an opportunity to workshop this feedback with Auckland Transport (AT) to ensure that the RPTP is aligned with the investment activity of Kāinga Ora alongside the planned growth of the region. This, coupled with more intensive urban development, safer streets and better pedestrian connectivity, would help increase public transport mode share, actively supporting AT's proposed improved Public Transport (PT) systems and efforts to mitigate climate change. Kāinga Ora considers that the RPTP has not fully considered all options available to achieve this goal.

10. Kāinga Ora is concerned that the draft Plan may not align with existing strategies and plans endorsed by Auckland Council such as the Transport Emissions Reduction Plan (TERP) and the Auckland Plan 2050. Kāinga Ora considers that the transport outcomes identified in the TERP should provide direction for the medium and long-term sections of RPTP, and that the short term funding decisions and interventions should demonstrate how these decisions achieve these outcomes.

11. Kāinga Ora consider a wider range of options should be considered for immediate implementation, including reallocating existing road space for buses and cycle lanes.

12. Kāinga Ora is concerned that the draft RPTP does not provide sufficient mitigation of climate change impacts (which the city is experiencing more and more of) from the transport network by providing the majority of Aucklanders with real options for public transport. Auckland, as New Zealand's largest city, has the opportunity to play a significant leadership role towards emissions reduction. That said, Kāinga Ora has been unable to identify from the draft RPTP how the targets for PT trips as set out in the TERP will be met.

13. The proposed PT Network 2031 does not support the vision of an equitable Auckland where Aucklanders can get to where they need to get to affordably and safely, across the region. This is particularly true for south and west Auckland.

14. Kāinga Ora welcomes the proposed improvements to public transport in the south and west, including:

- a) improvements to existing Frequent routes, 31, 32, 33 and Airport Link
- b) New frequent routes with the 37 and 39
- c) New train service with improved service with City Rail Link (CRL).

15. Despite the proposed improvements, Kāinga Ora is concerned that the proposed transport network in south Auckland does not appear to have equitable service provision, including less frequent services than other parts of the city.

16. Kāinga Ora acknowledges that current funding sources and capital and operational costs are evident constraints facing Auckland Transport in delivering public transport services. Kāinga questions if the RPTP should articulate more clearly the opportunities for lower cost interventions, such as reallocating general traffic lanes to bus lanes and greater use of parking management, both of which have the potential to significantly increase PT service levels at lower cost than current proposals.

Kāinga Ora considers that the proposed 2031 network does not sufficiently advance a vision that supports mode shift and reduced car dependency.

The Auckland Transport Emissions Reduction Pathway (TERP)

17. The RPTP should acknowledge the Auckland Council TERP outcomes. RPTP repeatedly cites limits to funding, but it appears to have used this limit to determine what the public transport targets ought to be rather than respond to the aspirations outlined in the TERP.

18. The RPTP needs to also identify the role that AT plays in delivering and supporting substantial CO₂ emissions reductions via mode shift and opportunities for people to reduce their private vehicle usage, resulting in a reduction in Auckland's vehicle kilometres travelled (VKT).

19. There is a gap between RPTP (150m annual public transport trips by 2030) and TERP (550m annual public transport trips by 2030) which is not explained. The RPTP should be demonstrating how this can be delivered and highlight any constraints to achieving this for decision makers. Kāinga Ora is unclear on why the RPTP has adopted the 150m annual public transport trip target rather than the 550m outlined in the TERP.

National policies, strategies and plans impacting public transport

20. The Aotearoa New Zealand Emissions Reduction Plan (ERP) sets the direction for climate action across a range of sectors over the next 15 years. The RPTP mentions it in Table 1 but the only subsequent reference to the ERP is in relation to current funding gaps. From a review of the

RPTP Kāinga Ora is unable to identify if sufficient public transport investment is being made to achieve the outcomes sought by the ERP.

21. The National Policy Statement on Urban Development clearly emphasises the need for wellfunctioning

urban environments. Kāinga Ora notes that the need for strong alignment on public transport and urban development is cited within the RPTP1. This needs to be reflected more clearly in the RPTP. While we welcome AT's commitment to deliver road layouts that enable PT provision, more commitment is needed on:

- i. Sufficient PT capacity to enable high-density mixed-use developments.
- ii. Improving safe and separated pedestrian and cycle networks, including end trip facilities at stations, to and from rapid transit stations and other public transport stops.

The role of public transport to shape cities, and support mode shift

22. Public transport has the power to shape cities. Kāinga Ora considers that the draft Plan should seek that changes in urban form is supported by better public transport, through working with Auckland Council and other agencies like Kāinga Ora. The RLTP should also identify the public transport that is required to support the type of urban form set out in the Auckland Plan 2050 and the GPS on Land Transport.

23. The RPTP contains no evidence as to how to grow the different types of journeys that people can

take by public transport. Instead, the draft plan fails to take into account such considerations as:

- i. Trip chaining and development of non-radial routes
- ii. Multi-modality (to any significant degree)
- iii. Leisure destinations (e.g. buses to beaches)

(1 RPTP page 50)

iv. Living working and playing in the same neighbourhood

v. The relationship between frequency and connectivity (this is particularly true for rail-bus connectivity).

vi. Land use-transport integration; development at highly-connected public transport nodes.

24. The RPTP does not appear to consider reassigning road space away from general traffic and car

parking to public transport or active modes. This absence is incompatible with the RPTP's aim of ensuring that public transport is competitive with driving. Road space reallocation is a costeffective way to move more people within an existing road corridor and actively reduce single occupancy vehicle travel. Given the funding constraints identified, Kāinga Ora suggests that more investigation into road space reallocation should form part of the RPTP.

25. Kāinga Ora acknowledges that Auckland Transport has advanced work on first-and-final-leg (FFL) transport planning. Walking is the most universal transport mode and a significant component of public transport demand. Despite this, there appears to be limited consideration of the quality of the pedestrian environment within the RPTP. Kāinga Ora suggests that the RPTP addresses the following within the pedestrian environment:

- i. Ease of crossing roads
- ii. Pedestrian level of service (LoS)
- iii. Universal Design
- iv. Pedestrian experience enhancements.

26. The RPTP envisages 30-minute rail frequencies in evenings. This creates inequitable outcomes for those people with shift work and night-time family care responsibilities. Substantial increases in public transport use by 2030 will necessitate equitable frequencies (10 minutes or better) throughout the operation hours.

27. Congestion charging has been identified in the RPTP as being conducive to mode shift. If congestion charging is to be further considered greater clarity on how any funds generated will be utilised and what outcomes will be supported is recommended.

28. Kāinga Ora considers that the timing, sequence and scale of investments needs to be informed by spatial planning and respond to population change and growth. Demographics and population growth forecasts receive no substantive mention in RPTP; this is a potential gap and potentially risks the RPTP not adequately addressing Auckland's existing needs or delivering mode shift to support climate change objectives as the city continues to grow.

Māori Outcomes

29. Kāinga Ora questions if additional work needs to be done to identify outcomes for Māori, and the impact of public transport as a real transport choice. The draft Plan provides only for the monitoring of Māori outcomes although it is unclear what targets will be measured or what evidence base will be used.

Public Transport supporting Kāinga Ora developments and improving equity

30. Kāinga Ora is currently delivering increased residential intensity across Auckland, particularly within its Large-Scale Project (LSP) areas such as Northcote, Oranga, Roskill, Tamaki and Mangere. Kāinga Ora acknowledged that planning for these development areas indicates that some locations will receive Frequent public transport routes, this is not comprehensive.

31. The Proposed 2031 Public Transport Network Plan (shown below) indicates that some Kāinga Ora LSP areas would receive lower levels of service than other more central areas of Auckland. Further, west and south Auckland remain relatively underserved given that these are areas of significant housing growth. Population distribution across the city is changing over time and the RPTP does not fully reflect these changes and how such large-scale growth will be serviced.

(RPTP map attached here)

32. Kāinga Ora notes that there are Spatial Delivery Strategies (SDS) for Mangere and Roskill, which were developed in partnership with AT. These strategies show a network that supports growth in these areas – including frequent services around Roskill and improved frequency in Mangere, supported by improved walking and cycling connections. The RPTP, as is, does not fully reflect the outcomes of the SDS, including Mangere which appears to still be relying largely on connector services.

33. Kāinga Ora has prepared several ITAs for areas where it is undertaking Large Scale development. Kāinga Ora has developed these ITAs alongside Auckland Transport. Many of these ITAs identify public transport needs and service level improvements. Specific feedback on how the recommendations from these assessments compare to the RPTP is provided below:

34. Northcote:

a) The Northcote ITA recommends additional bus services and higher frequencies to support increased public transport use. Kāinga Ora welcomes the improvements to the 923/924, 926, 928 and 942.

35. Oranga:

a) The proposed 2031 network generally aligns with assumptions and recommendations from the Oranga ITA, including better evening frequency on the 66 route. However, the ITA notes that as the population increases it could be beneficial if the frequency of connector routes is increased and the routes reviewed. Kāinga Ora notes that no allowance for the outcomes of any review have been signalled in the RPTP, nor has the recommended additional bus stops in Mt Smart Rd near Felix St been provided for in the RPTP.

36. Tamaki:

a) The Tamaki ITA has a target future mode share of 30% reduction in car travel compared to the 2018 baseline. By prioritising the development of a comprehensive and reliable public transport system, Tamaki can reduce congestion, promote sustainable travel options, and enhance the overall accessibility for their residents.

b) Kāinga Ora supports the new 74 and 76 frequent bus services. The RPTP is generally aligned with the recommendations from the Precinct ITA; however Kāinga Ora notes that there is no mention of a future 65 route. Panmure North is also served by route 744. The current draft ITA indicates that this bus service will need to have increased frequency and this is not currently identified within the RPTP.

37. Mt Roskill:

a) Roskill South

i. The Roskill South ITA indicates that there is a good level of existing bus services to the Roskill South neighbourhood. This is sufficient to support the development.

At the time of the ITA, the following routes serviced Roskill South:

1. Crosstown 68
2. 25B Connector
3. 25L connector

4. Crosstown 670

ii. The RPTP also includes additional peak services (252, 253) and splitting of the 670 into the 67A and 67B (frequent service). Overall the result is additional services during peak. RPTP provision is considered sufficient to support growth in Roskill South.

b) Owairaka

i. The Owairaka ITA recommends more frequent bus services to support the urban development within Owairaka, in particular improved connections to the city centre. The ITA records following routes service Waikowhai Neighbourhood:

1. 22 – RPTP 22N and 22R connector services, frequent route.
2. 209 – RPTP maintains peak service
3. 24R – RPTP maintains connector service to city centre
4. 670 – RPTP upgrades this to the new crosstown 67A and 67B connectors, forming frequent route to Onehunga
5. 66 in Mt Albert Road – this is due to receive evening improvements.

ii. Additional frequency of services above proposed RPTP to the city centre are recommended. Kāinga Ora also seeks that route 24R is upgraded to a 'Frequent route'.

c) Waikowhai

i. The Waikowhai ITA notes that at the time of writing the proposed future services were appropriate. However, the RPTP has proposed to downgrade the 27H and 27W from a proposed frequent route to maintain the current connector route service. Kāinga Ora seeks that these routes are maintained as frequent routes as previously proposed.

ii. At the time of the ITA, a New Lynn to Auckland Airport service was proposed that is not included in RPTP, this is a possible gap in the network. The ITA also recommends improvements to walking and cycling links and bus shelters.

d) Wesley West

i. The Wesley West ITA recommends more frequent bus services on Sandringham Road to a 'Frequent route' standard. The draft RPTP indicates a connector route to be maintained along Sandringham Road in the vicinity of the development. Kāinga Ora seeks that this route is identified as a frequent route.

ii. Wesley West is targeting significant mode shift and will require adequate PT provision to support this outcome. Increased frequency on this route should be a priority. Early stages of Wesley West Development are located to the western edge of the neighbourhood, a greater distance from the bus network on Sandringham Road. Reinstatement of the 24W to service Stoddard Village during the peak is sought to maintain PT connections to the city centre.

38. Mangere

The Mangere neighbourhoods of Buckland & Wickman, Mangere East and Aorere are planning for a considerable increase of housing supply in these neighbourhoods. Beyond Kāinga Ora's own planning additional development by the wider market is also evidence in these communities. Infrequent bus services through these neighbourhoods does not encourage uptake of PT.

a) Mangere East

i. There are FTN bus routes connecting Mangere East to Mangere Town centre, Otara Town centre, Otahuhu rail station, Onehunga Town Centre, Papatoetoe rail station and Manukau. The Mangere East ITA identifies the continuation of these frequent routes.

ii. The RPTP does not propose any further improvement in terms of increase to FTNs in this area despite the growth that is planned in this neighbourhood. It is noted that there is currently no connection to the nearest rail station, Middlemore. Kāinga Ora seek upgrades of routes 309, 313 and 325 to FTNs. This would provide better connection to the city to the north-east and to the south from this neighbourhood and enable mode shift.

b) Buckland and Wickman

i. Supporting mode shift in this location is identified as a desirable outcome however is constrained by current poor-connections.

ii. Potential options that Kāinga Ora seeks are further explored for inclusion within the RPTP include; increasing the 324 service to a FTN route, provision of a potential new bus route that would connect both the Buckland and Wickman

neighbourhood and the Mangere East neighbourhood to the Middlemore rail Station.

Conclusion

39. Kāinga Ora through its housing activity is seeking to contribute to the development of wellfunctioning urban environments which are supported by an equitable, accessible and sustainable transport system.

40. Kāinga Ora remains committed to working with Auckland Council and Auckland Transport, to help move towards a future urban environment with a wide range of affordable and environmentally responsible transport choices. Kāinga Ora welcomes any opportunity to discuss this feedback further with Auckland Transport and seeks to be included in the key interest group workshops planned for September.

Ministry of Education

08 August 2023

Kia ora,

Please accept the following feedback as the Ministry of Education's submission on the draft Auckland Transport Regional Public Transport Plan 2023-2031 (RPTP), as required under Section 125(1)(e) of the Land Transport Management Act 2023. As School Transport assistance is provided by the Te Pou Hanganga, Matihiko group of the Ministry, the Secretary for Education, Iona Holsted, has asked me to provide the following feedback on her behalf.

The Ministry is generally supportive of the information provided in the Plan, which seeks to provide safe and accessible public transport to all (including students).

Background

Ministry-funded school transport assistance is provided through the administration of an appropriation from Vote Education. The purposes for which this appropriation may be used are detailed in section 559 of the Education and Training Act, 2020 which states:

Section 559 School Transport

The Secretary for Education may assist in the provision of school transport by doing any of the following:

- a) paying schools to provide school transport to their students;
- b) arranging transport providers to provide school transport;
- c) contributing to the cost of parents providing school transport.

School Transport policy is designed to ensure the efficient and fair distribution of a limited resource. Under this policy, School Transport assistance is only available to students who meet all three of the following criteria:

1 Land Transport Management Act 2003 No 118 (as at 23 February 2022), Public Act 125

Consultation requirements for regional public transport plans – New Zealand Legislation

2 Education and Training Act 2020 No 38 (as at 01 January 2023), Public Act 559 School transport – New Zealand Legislation

a) They are attending their closest State or State integrated school that they can enrol at

b) They live more than a certain distance from school:

- 3.2km for Years 1 – 8

- 4.2km for Years 9 – 13

c) There is no suitable public transport available. "Suitable" public transport must travel within:

- 2.4km of the roadside gate of the student's home, and

- 2.4km of the closest appropriate school.

In assessing suitable public transport options, the Ministry gives consideration to the following guidelines:

While caregivers are ultimately responsible for getting students to and from school, the Ministry may offer assistance to students in cases where distance, mobility or other issues create barriers to accessing an appropriate learning environment.

Demarcation between Regional Council and Ministry-funded services

The Ministry has a specific focus on reducing barriers to educational access and offers transport assistance as an enabling service in support of this objective. The Ministry's school transport services traverse the whole country but largely consist of low-volume services in rural and peri-urban areas where there are no suitable Public Transport (PT) options. Despite significant differences in their funding models, legislative mandate and geographical distribution, Ministry-funded services can overlap with PT operations delivered by regional councils.

While we engage through formal and informal communication channels to try to avoid duplication or gaps in services in regions, there are no formal, national guidelines governing the demarcation of PT and Ministry-funded School Transport services. Historically, the Ministry has assumed that PT planners will observe Waka Kotahi's 2013 guidelines for Public Transport (PT) planning, which states the Ministry is a "provider of 'last resort'":

The Ministry maintains ongoing dialogue with Waka Kotahi and the Ministry of Transport, and regularly advocates for greater co-operation between regional councils and the Ministry's School Transport group to maximise efficiency of the wider PT network and minimise gaps and disruption

for the network's users. We see this as an area of significant opportunity for meaningful future collaboration between AT and the Ministry.

We believe there may be further opportunities for the Ministry and Auckland Transport to work co-operatively to develop, clarify and refine operational policies governing the provision of services that serve ākonga. A strategic and collaborative approach would allow both agencies to ensure services are aligned for optimal public value and remain responsive to the changing needs of communities and the wider region. A collaborative approach to service planning has the potential to assist AT in meeting their goals of reduced emissions and delivery of integrated services. As the Ministry has a clear mandate on how it allocates its funding for school transport assistance, we are eager to establish and implement terms of engagement between our two organisations to collaborate on school transport planning to support this.

In particular we are eager to explore how the Ministry and AT might collaborate regarding the aim of "increas[ing] the share of trips made by walking, cycling and public transport", especially those trips made by students.

-Ideally, the student:

- won't have to be picked up before 7 am;
- can get to school before it starts;
- can be picked up no later than one hour after school finishes;
- won't have to change buses more than once on a journey.

Section 9.2 Consultation with Key Stakeholders

Ministry of Education: in respect of school transport services, the Ministry of Education is a provider of 'last resort' – where a suitable public transport service exists, the Ministry of Education is legally unable to provide a duplicate service.

Overall, the Ministry requests that AT undertake regular engagement with the Ministry and schools when planning for routes that run near to school sites, including school bus services. This will enable a co-ordinated approach to ensure public transport networks are provided to and around our school communities to support safe and accessible travel to school.

We have provided a table of specific feedback to AT's Draft RPTP below, which we believe will enhance our joint strategic and collaborative approach and allow both agencies to ensure that services remain responsive to the need of the community.

3.2. Goal 1

The Ministry supports this goal and points 6 and 7 of AT plan on how to achieve this by 2031. The Ministry agrees that students waiting for an AT service should be able to make alternative arrangements quickly and easily should there be a delay or cancellation of AT routes.

3.6. Goal 5

The Ministry supports the goal of AT proactively partnering with schools to identify opportunities to enhance the services they receive, but request that the Ministry's School Transport group be included in any such arrangements.

5.2. Goal 1

The Ministry recommends that Policy 1.9. School Services be amended to reflect the sentence that 'AT will engage with schools and the Ministry of Education prior to any removal of service'.

The Ministry also recommends that this policy reflects engagement with schools prior to any service amendments, rather than exclusively service removals.

5.6 Goal 6

The Ministry recommends that the Ministry is considered and listed as a stakeholder under Policy 16.1 'Consultation process' in reference to the consultation of 'Major changes to route network and structure affecting a number of corridors or operating units'.



Ngāti Manuhiri Settlement Trust

Tēnā koe,

As mana whenua and the mandated iwi authority for the Gulf Harbour area we oppose the withdrawal of the Gulf Harbour ferry service as outlined on page 104 of the draft 2023-2031 Regional Public Transport Plan. I support reinstatement of full services, extending to weekend services. This will align with other ferry services and multi-modal transport across the Auckland Region.

Mauri tū, mauri ora

General comments on RPTP

Thank you for providing Waikato District Council (WDC) with the opportunity to make a submission on Auckland Transport's draft Regional Auckland Public Transport Plan.

We acknowledge the effort that has gone into producing the draft Plan in working towards the provision of safe, efficient, and affordable public transport for Auckland.

However, whilst the Plan is pitched as a 'regional' plan it is disappointing that that it is done from a very Auckland-centric perspective (i.e., the Auckland region) as it does not adequately acknowledge public transport from a true regional and cross boundary perspective, especially with regards to the northern Waikato.

We acknowledge that the Waikato region falls within the Waikato Regional Council's (WRC) jurisdiction for the provision of public transport, but if we remove 'political' boundaries, the movement of people, goods and services between the Waikato and Auckland is not determined by the boundary.

It is critical that we plan for the southern Auckland and northern Waikato area in an integrated and cross-boundary manner and in a true 'regional' sense. This is something we want the Plan to acknowledge particularly with regards to the relationship that communities in the northern Waikato (e.g., Port Waikato, Tuakau, Pokeno, Mercer and Te Kauwhata) have with Auckland.

The northern Waikato will be home to an additional 50,000 (and possibly more) people over the next 50 years so not planning for public transport in a cross-boundary matter will lead to undesirable public transport outcomes.

It is commonly understood that the northern Waikato is intrinsically linked to southern Auckland so it is a concern if Auckland Transport's Regional Public Transport Plan does not acknowledge the wider (cross boundary) regional transport context and the joint planning that needs to occur for the provision of public transport which will be to the benefit of both Auckland and the Waikato. Operationally, Auckland Transport does to some extent acknowledge the relationship between some of the towns in the northern Waikato and Auckland through the provision of the route 398 bus service - which runs between Pukekohe and Tuakau - and the route 399 service - which runs between Port Waikato, Tuakau and Pukekohe. The WRC (with funding from WDC) also provides a service (route 44) between Pokeno and Pukekohe service seven days a week. However, strategically we would like Auckland Transport to work with both WDC and WRC to look at ways in which we can better connect our communities across the northern boundary through both bus and rail.

Auckland Transport should also note that the Counties Manukau Health (under Te Whatu Ora) boundaries includes most of Waikato district's northern wards and a large swathe of our western districts ward) <https://www.countiesmanukau.health.nz/about-us/boundary-maps/>. As far as education is concerned the zone for Pukekohe High School extends to the northern edge of Pokeno and encircles Mangatawhiri <https://www.pukekohehigh.school.nz/enrolment-zone/>.

WDC also acknowledges the work being done by Te Tupu Ngātahi Supporting Growth (i.e., the collaboration between Auckland Transport, Waka Kotahi, Auckland Council, KiwiRail and mana whenua in Tāmaki Makaurau) to investigate, identify, and route protect the strategic transport networks required to support Auckland's future urban growth areas in response to the Auckland Council's Auckland Plan 2050 and Unitary Plan. In our submission on this programme earlier this year, we noted that Mill Road (Bombay) is an important strategic connection between southern Auckland and the northern Waikato. This has since been acknowledged by Supporting Growth with a proposal to protect land to enable Mill Road and Pukekohe East Road to be upgraded to strengthen its strategic function. This future upgrading proposes four laning from the SH1 Bombay interchange to Harrisville Road with walking and cycling facilities along the length of the route into Pukekohe. A section of the proposed route sits along the Auckland/Waikato jurisdictional boundary (which is the road centreline for part of the road). The Waka Kotahi Notice of Requirement to route protect this corridor has commenced. We had written to Te Tupu Ngātahi Supporting Growth programme expressing our appreciation for this consideration.

With Pukekohe being a key anchor town along this corridor, its significance as a key transport hub for both bus and rail (the latter when the railway station upgrade and electrification of the railway line from Papakura to Pukekohe is completed) becomes even more important. In this regard, WDC wishes to advise that, together with WRC, we are currently investigating the feasibility of railway stations in the northern Waikato (Tuakau, Pokeno and Te Kauwhata) for Te Huia in the short-term. However, it is important that we continue to advocate for the extension of rail electrification from Pukekohe southwards to Tuakau and Pokeno at the very least as, in the long term, we see these towns being connected into the Auckland rail network. We cannot do this if Auckland Transport does not identify this (Pukekohe-Tuakau-Pokeno) as a strategic rail link in the future. We need to work together (and with central government) to ensure that rail electrification can be extended southwards from Pukekohe. This should be identified as a potential future rapid transit network that extends from Pukekohe to Tuakau and Pokeno (at the very least) in your frequent and rapid transit map in the draft Plan.

WDC and WRC will be doing some investigations over the coming months to look at bus connections between the northern Waikato towns and Pukekohe and potentially between Te Kauwhata, Pokeno and the Papakura Railway Station (or the Drury Railway Station when the latter is opened). Whilst conversations have been held with Auckland Transport regarding the possibility of a bus link from Pokeno to Papakura, we need to ensure that this potential link is also acknowledged in the Auckland Public Transport Plan as something that can materialise within the next three years.

These strategic transport initiatives and the intrinsic relationship between the northern Waikato communities and Auckland should be acknowledged in the Regional Public Transport Plan so that Waikato District Council, Waikato Regional Council, Auckland Council, Auckland Transport, and central government can work together to better connect our communities and improve economic productivity and social wellbeing in a cross-boundary manner.

Waikato Regional Transport Committee

17 August 2023
Auckland Transport
General Private Bag 92250
Auckland 1142
Dear Sir/Madam

Waikato Regional Transport Committee Submission to Auckland Regional Public Transport Plan
Thank you for the opportunity to submit on the proposed Auckland Regional Public Transport Plan.
Please find attached the Waikato Regional Transport Committee's (the RTCs) submission regarding these

documents. The submission was reviewed and endorsed by the Regional Transport Committee before being approved by the Chair of the Regional Transport Committee under delegated authority on 17 August 2023.

Should you have any queries regarding the content of this document please contact Julie Hansen, Senior Policy Advisor Transport and Infrastructure, Transport Policy and Programmes directly on (07) 858 4631 or by email Julie. Hansen@waikatoregion.govt.nz.

Submission from Waikato Regional Transport Committee on the Auckland Regional Public Transport Plan

Introduction

1. This is a submission by the Waikato Regional Transport Committee (RTC). The RTC comprises elected

members from Waikato Regional Council and the region's territorial authorities, and regional representatives from Waka Kotahi NZ Transport Agency, KiwiRail, New Zealand Police and CCS Disability Action (Waikato).

The RTC welcomes the opportunity to make a submission on the Auckland Regional Public Transport Plan (ARPTP).

As a neighbouring region, we have a particular interest in provisions in the ARPTP insofar as they relate to inter-regional services, both by bus and rail. We see opportunity to increase benefits to both

regions through improved inter-regional public transport services and seek support through the ARPTP to achieve this.

The RTC supports the overall ARPTP but considers there are further opportunities to strengthen Support for inter-regional public transport services.

The Waikato region holds a strategic position in the upper North Island and forms part of the "golden triangle" encompassing Auckland, Hamilton and Tauranga. It is vital that cross-boundary issues such

as inter-regional public transport are adequately addressed through policies and actions in the ARPTP.

Growth

6. The Hamilton-Waikato metro-spatial area is a sub-region of Waikato region and extends from Taupiri

in the north to Te Awamutu and Cambridge in the south. Hamilton is the main centre. It is anticipated

the population of the metro-area will double over the next 50-100 years.

The northern part of the region i.e. in Waikato District, is also experiencing strong population increase

due to growth pressure from Auckland as Auckland's southern urban edge expands outward. This increases demand for business and housing in the northern Waikato District urban areas.

Future Proof

8. As a result of the considerable growth in Waikato region described above, a framework has been developed between the relevant authorities and stakeholders to manage this growth.

9. Future Proof is a joint project set up to consider how the sub-region of Hamilton City, and Waikato,

Waipa and Matamata-Piako districts will develop into the future. Within the Future Proof framework are several plans and strategies specific to the sub-region that aim to manage growth in a collaborative and sustainable way.

10. The overarching Future Proof Strategy (FPS) incorporates the Hamilton to Auckland (H2A) Corridor

Plan (H2AP) and the Hamilton-Waikato Metropolitan Spatial Plan (MSP). This sub-regional and corridor approach is needed to manage growth in a staged and coordinated manner and to address complex planning issues, especially cross boundary issues.

11. Auckland Council, among others, is a partner in the H2AP therefore particular regard needs to be

given to the H2AP in the context of the ARPTP.

Inter-regional services

12. There are currently four inter-regional public transport services between Auckland and Waikato regions identified in the Waikato Regional Public Transport Plan:

- Hamilton — Auckland passenger rail (Te Huia — covered later in this submission)
- Pokeno to Pukekohe (bus service)
- Northern Connector (Hamilton to Pukekohe bus service)
- Port Waikato to Pukekohe (bus service)

13. Bus services between Pukekohe in the Auckland region and towns in Waikato region provide a vital

service for residents, enabling access to employment and services.

14. To ensure compliance with the legislation, it is important these cross-boundary services are clearly

identified in both RPTPs and that unit descriptions are aligned, allowing the contracting of these services under the Public Transport Operating Model. Waikato Regional Council, as the operator of public transport services in this region, requests amendments to section 7.5 Services List to incorporate the inter-regional services. A full list of these is attached as Appendix 1.

Te Huia Hamilton to Auckland passenger rail services

15. Te Huia is the inter-regional passenger rail service connecting Waikato and Auckland. Despite Covid-

19 cancellations and the impacts of multiple projects and maintenance works impacting the Auckland

rail network, passenger numbers on this innovative trial continue to grow and Year one and Year two

targets have been achieved.

16. Figures for April 2023 show that Te Huia carries an average of 321 passengers each weekday. This is

the equivalent of about 37,000 kilometres of car travel per day. Around 70% to 80% of Te Huia services reduce emissions in Auckland'. This is a significant number of vehicles not using the Auckland

road network (that might have otherwise), and therefore not adding to the current congestion problem, nor contributing to climate change.

17. Noting that National Land Transport Funding is only confirmed until June 2024, securing a future for

Te Huia is a critical path issue for the Waikato Regional Transport Committee and Waikato Regional

Council. Once this is confirmed, there are many opportunities for the service which we ask are considered within the ARPTP. These include:

a. A funding contribution for the service from Auckland ratepayers, reflective of the increasing number of passengers who choose to use the service in a southbound direction.

b. Consideration of enhancing the operating model (probably after the opening of the City Rail Link) to provide a more balanced timetable and enable an early morning southbound train from Auckland to the Waikato.

c. A commitment to the funding and implementation of stabling and maintenance facilities in

Auckland to support point b above. We note these would also be of immediate benefit to the Northern Explorer service and could enable additional Auckland to Wellington services to operate.

Rail — other matters

18. The Waikato RTC agrees with AT and is also generally supportive of amendments regarding exempt services. We also feel that there is a missed opportunity to better enable inter-regional services to operate with subsidies (by not automatically being classified as exempt).

19. More broadly, the Waikato RTC requests consideration of several other rail matters within the ARPTP:

a. We note that following budget approval, KiwiRail is now developing a Detailed Business Case to consider extension of electrification on the North Island Main Trunk (NIMT) and East Coast Main Trunk (ECMT) lines. This has potentially significant benefits for both passengers and freight (journey time improvements, procurement of standardised equipment etc). In addition, it could remove diesel locomotives from Auckland (emissions reduction, air pollution benefits etc).

b. Further, the Waikato RTC notes the recommendations of the recent Parliamentary Inquiry into Inter-Regional Rail, particularly related to the establishment of passenger rail services between Auckland and Tauranga via Hamilton. The Waikato RTC asks the Auckland RTC to ensure both electrification and new inter-regional services are included within the ARPTP as these are of significant potential benefit to the Auckland region.

c. Following recent completion of an Indicative Business Case investigating options for railway stations in the upper north Waikato area (probably Tuakau and possibly Pokeno), Waikato District Council and Waikato Regional Council will shortly consider whether to allocate funding within Long Term Plans for more detailed planning and potential station construction within the next five years. While these stations would firstly provide a connection to Te Huia (which in itself would assist with reducing Auckland congestion), they would be constructed to Auckland rail standards and could provide for an extension of the Auckland Metro network, particularly after electrification of the NIMT.

Benefits of inter-regional public transport services

20. Public transport provides many benefits both to the communities it serves, and to the wider environment. Public transport enhances access to opportunities and services, contributes to better road safety outcomes, and reduces congestion and carbon emissions.

21. The proposed ARPTP recognises that “more public transport services and greater usage is a core part

of moving to a more sustainable transport system”. Additionally, Auckland’s Transport Emissions Reduction Pathway seeks to “massively increase public transport patronage”. The Waikato RTC contends that inter-regional public transport is already helping Auckland to meet its own targets.

22. The Waikato RTC believes that Auckland should consider inter-regional public transport services (both

bus and rail) as integral to its own network given the value of these services to reducing congestion in Auckland and providing those communities living right on the boundary of Auckland with improved

employment, education, health and social / leisure access. There is also a direct benefit to those residents of Auckland who use the services to access similar facilities in the Waikato region.

23. The ARTPT recognises that park and ride facilities help to intercept private vehicle commuter trips

‘upstream’ of congestion and direct these trips instead onto the public transport system. They are considered to be most effective in areas that are car dependent with minimal alternative to access public transport services and are generally suited to the urban periphery. Again, the small urban areas

in the north of Waikato region are ideally placed to support these types of facilities and can contribute

to the outcomes sought in the ARPTP.

Conclusion and recommendation

24. The Waikato RTC considers the current inter-regional public transport services between Auckland and

25.

Waikato provide significant benefits to residents of both Waikato and Auckland regions. Growth in the north of the region because of population pressures in Auckland could be better supported by enhanced public transport services including increased frequency of Te Huia and retention of existing bus services.

We recommend the ARPTP is amended as follows:

- To provide stronger recognition of, and support for, not only the current inter-regional public transport services, but enhanced services that assist both Auckland and Waikato regions to meet their transport objectives.

- Section 7.5 Services List includes the inter-regional services detailed in Appendix 1 to this submission.

- Include funding to support Te Huia from July 2024, including consideration of enhancing services to encourage more Aucklanders to catch the train southbound, and to identify funding for stabling and maintenance facilities in Auckland for Te Huia and Northern Explorer. More prominently support an extension of electrification between Pukekohe and Hamilton, and the East Coast Main Trunk.

- Support construction of new railway stations to Auckland Metro standards in the north Waikato area.

Submitter details

Waikato Regional Transport Committee

c/- Waikato Regional Council

Private Bag 3038

Waikato Mail Centre

Hamilton 3240

Contact person:

Julie Hansen

Senior Policy Advisor Transport and Infrastructure, Transport Policy and Programmes

Email: Julie.Hansen@waikatoregion.govt.nz

Phone: (07) 858 4631

Appendix 1: Inter-regional public transport services

Route

number

Route Name Service area Unit Level of Service

Current Future

(2023) (2031)

Current Future

(2023) (2031)

R1 Te Huia

Passenger Rail

Hamilton, Huntly and

Auckland

Description of changes

As defined in the Waikato

RPTP and contracted by

WRC

As defined in the Waikato

RPTP

44 Pokeno to

Pukekohe

Pokeno, Tuakau and

Pukekohe

As defined in the Waikato

RPTP and contracted by

WRC

As defined in the Waikato

RPTP

21 Northern

Connector

(Hamilton to
Pukekohe)
Hamilton, Huntly, Te
Kauwhata, Pokeno, Tuakau,
As defined in the Waikato
RPTP and contracted by
As defined in the Waikato
RPTP
Pukekohe WRC
399 Port Waikato Port Waikato — Tuakau —
Pukekohe 62 420
Rural
Township
(Thursdays
only)
Rural
Township
(Thursdays
only)
Current contract wil expire in
October 2025, and AT will engage
with Waikato Regionl Council and
WaikatoDistrict Council to determine
the future of this service.
Doc # 26890141

Waka Kotahi NZTA

16th August 2023
Auckland Transport
20 Viaduct Harbour Avenue
Auckland, 1010

Auckland Regional Public Transport Plan – Waka Kotahi Feedback

Thank you for the opportunity to continue to provide feedback on the development of Auckland Transport's Regional Public Transport Plan 2023-2031 (RPTP). Waka Kotahi staff have provided input through earlier stakeholder workshops in December 2022 and April 2023, which has informed the development of the draft RPTP. This letter sets out Waka Kotahi's consolidated submission on the draft RPTP that was released for public consultation in July 2023.

We are broadly supportive of the draft RPTP. In particular, we support how there's good recognition of changing travel patterns in post-lockdown world, which challenges the traditional focus of public transport on peak commuting to Auckland's city centre.

Our main areas of suggested improvement are:

- To ensure the RPTP is able to act as a clear 'overarching' narrative for investment in public transport over the next decade (creating efficiencies for future business case development and assessment), it would be beneficial for the document to more clearly outline the factors driving the need to grow public transport (beyond just emissions reduction) and the benefits expected from doing so. While much of this information already exists (e.g. in the Future Connect Strategic Case), it would be helpful to provide a stronger story about the role public transport will play in addressing critical regional transport issues.
- The RPTP should outline why the proposed programme of service improvements over time is the best way forward. This does not need to be comprehensive, but would again be helpful in providing confidence about why the suggested approach is preferable to some alternatives (e.g. growing the frequent network rather than focusing on coverage or peak time express services). Auckland's success in significantly growing public transport from 2010-2019 through a strategy that is now broadly being continued would be a big part of this story.
- The short-term focus section should be written in a way that remains relevant through to the end of 2024. A greater focus on some of the opportunities to improve public transport performance (e.g. through small-scale infrastructure improvements and service optimisation) could be one way of doing this.
- The long-term focus section should provide more detail about what might be required to meet some of the targets set out in the Government's Emissions Reduction Plan and the Council's Transport Emissions Reduction Pathway documents. This would help the public and funders better understand the funding and delivery needs to achieve these goals. Emerging work on the Auckland VKT Reduction Programme could feed some information into the final RPTP.
- The vision and goals section should have greater consideration of public transport's role in supporting the economic success of Auckland, especially in providing fast, reliable and space-efficient access to employment and education opportunities.
- Various relatively minor changes to the actions and policies sections, especially about the approach to on demand services, park and rides, Community Connect, integration with the City Centre bus plan, and greater recognition of the role Waka Kotahi plays in public transport.

The attached table provides more detailed submission points.

Yours Sincerely,

Randhir Karma
Regional Manager System Design (Tamaki Makaurau & Te Tai Tokerau)

RPTP section
Waka Kotahi detailed feedback
Introduction and Context

- Consistent language should be used when discussing “low emission” vs “decarbonising” and the plan needs to define what these terms mean.
- The role of public transport in helping to address many of Auckland’s critical transport issues, and the benefits of doing so, should be more clearly outlined. This should include consideration of the consequences of not taking steps to continue to improve public transport over time, as well as some of the key benefits of doing so. This can draw from wider transport planning work that already exists.
- More detail on why the preferred approach has been chosen, compared to other potential approaches, would be beneficial in helping to provide confidence that this is the best pathway forward to improving public transport in Auckland. This will help provide funders and the public confidence that we are taking the best possible approach. Although the plan mentions that extensive consultation took place, there is little discussion around what options were explored and why this preferred programme was selected, including responses to anticipated demand.
- Statements about funding public transport should mention that not all government funding is channelled through the National Land Transport Fund.
- The ‘Multi-modal Innovation’ section should comment on Auckland Transport’s position improving access to public transport, including first and final leg journeys

The Plan

Short term focus:

- This section should clarify what is meant by full bus service reinstatements, including consideration of both temporary and permanently suspended trips (including services that were permanently varied out of contracts), and the different funding sources that have enabled this to occur (including support from the Climate Emergency Response Fund (CERF)).
- It is important for this section to remain relevant once the final RPTP is published, rather than telling an ‘early to mid-2023’ story. E.g. bus driver shortage resolved. A greater focus of this section on accelerating low-cost improvements such as bus and transit lanes, to maximise on quick wins and improve service performance, would be a good way of ensuring this section remains relevant through to the end of 2024.

Medium term focus

- The section about rail timetable improvements post CRL implementation should be clear about any key dependencies (such as level crossing removals) so the public fully understands what service improvements will occur and when, and that AT is realistic with what is achievable within these timelines.
- We suggest that the discussion of ‘other service changes’ provide more information about where these improvements are targeted (beyond just serving growth areas), such as expanding the frequent network, enhancing access to and from lower income areas and focusing on post-Covid travel patterns.

Long term focus

- This section could provide more detail (e.g. funding requirements etc.) about what might be required to make progress towards the targets set out in the Government’s Emissions Reduction Plan, as well as the Council’s Transport Emissions Reduction Pathway. The final RPTP could draw on emerging work from the VKT Reduction Programme to help funders and the public better understand what will be needed to achieve these goals. Waka Kotahi is keen to see medium term improvements targeted at expanding frequent network, enhancing access to and from low income areas, but also being mindful about post Covid travel behaviours (e.g. more inter peak and weekend improvements).
- This section could use the addition of a graphic or timeline showing an emissions reduction pathway, and the steps that will need to be taken between now and 2035 to meet these targets.

Vision and Goals

General

- We support the vision statements outlined in this section and believe that these are well framed to provide a positive outcome for public transport users in Auckland. It would be helpful for there to be some recognition of potential trade-offs between the different goals as well as how these trade-offs might be managed. For example, how do the costs of operating the current network stack up to what is needed for future improvement, as well as the impact that fare revenue has on these future goals.
- There does appear to be a missing goal around the important role of public transport in supporting economic success in Auckland. The efficiency of public transport, especially rapid transit, and its

ability to move large numbers of people in a reliable way, plays a critical role in the region's economic success. This is especially true in relation to providing access to employment and education opportunities.

Goal 1: Servicing providing an excellent customer experience

- The National Ticketing Solution will be implemented during this period and will significantly improve the customer experience. It should therefore be mentioned in this section, including some of its key benefits compared to currently ticketing (e.g. easier for irregular or new users to access public transport by using their bank cards).

Goal 2: Enhancing the environment and tackling the climate emergency

- We suggest clarifying the language around zero emissions or low emissions buses. The 2035 emissions target set by the government is for 'zero emission buses' not low emission.
- The 'what we plan to achieve' box is very focused on emissions from the public transport system and embodied emissions. An additional point around the desired scale of growth in public transport use and mode share would help clarify that the most important contribution public transport makes to the climate emergency is through mode shift and helping reduce private vehicle travel.

Goal 3: Safe and accessible public transport for everyone

- This section should also mention recently introduced free travel for children and half-price travel for younger people and those with Community Services cards. These are tangible ways in which public transport is being made more affordable for those who often have lower incomes and where the cost of public transport is more of a barrier.

- Building upon the metric of maintaining 90% of Aucklanders being within 500m of a PT stop, we suggest an additional measure around access to frequent and rapid transport stops. This would highlight the importance of access to high quality public transport (not just any public transport).

Goal 4: Integrating public transport into a growing Auckland

- We recommend more of a focus on the rapid transit network in this section, given the major role its development over the next decade will play in helping to shape urban form and encourage development in areas with good access to opportunities and travel choices.
- We feel that the goals listed for supporting urban developments, such as multi modal connections to rapid transit have an implementation timeframe which is too long. What can AT do in this space to bring forward this work earlier than 2031?

- We would like you to consider all preventive and proactive resilience works needed on your network and to put these forward in this document. These can include small to medium (including LCLR) 'quick wins' that will significantly reduce potential disruption to your community.

Goal 5: Funding and delivering public transport transparently

- The paragraph on working with mana whenua appears like it may be in the wrong section.
- This section should provide some high-level information about what it costs to run public transport in Auckland each year, how much is funded by fares and how much is covered by Auckland Council and the Government. This would help highlight the sheer scale of investment that is made in public transport operations.
- There should also be recognition of the significant increase in costs to run public transport in recent years, and the growing reliance on non-fare revenue – with some discussion about how sustainable this increase is going forward into the future. This would provide useful context to emphasise the importance of transparency and the importance of continuing to optimise the public transport network. The section could also help reinforce one of the key messages that the network needs to evolve in a post-lockdown world where travel patterns have changed.

Actions

General

- We generally support the way goals have been broken down into tangible actions and the way this section of the plan is structured., subject to specific and relatively minor comments below.

4.2 – Goal 1 Actions

- We suggest the plan provide more clarity about how changes in usage of on-demand services will be managed. If there is a significant change and it is no longer cost efficient, how will this issue be addressed? What is the long-term transition plan for on-demand?

- How does the City Centre bus plan relate to the wider rapid transit projects currently underway in Auckland? We feel there needs to be decision making and funding priorities listed here.

4.4 - Goal 3 Actions

- This section should update the Total Mobility wording to reflect new 75% reduction in fares as per Community Connect

4.5 – Goal 4 Actions

- The document recognises that in built up areas, Park and Rides are not as efficient as feeder bus services. Given funding constraints and the need to maximise patronage, it may be helpful for the plan to outline the circumstances and process to divest existing Park & Rides in locations that are inconsistent with the wider strategy.
- We support charging for Park & Ride services, which could provide revenue back into Auckland's PT services.

Policies

- We generally support the policies outlined in the draft RPTP.
- We note that there was no mention in this plan of any emerging procurement related issues or opportunities, besides the brief mention of SPTF in Part 1. There would be benefit in documenting AT's ongoing partnership with Operators and how this is expected to be improved or maintained over the course of this RPTP.

Monitoring, evaluation and review

- Some of the targets could be more ambitious, especially in relation to service punctuality which is a critical driver of ridership and can be improved through low-cost options like bus lanes, better service timetabling and the use of technology to prioritise services at intersections.
- We suggest more clarity about how the 91% customer satisfaction rating is measured, specifically what does this look like within the Customer Satisfaction survey.
- We suggest additional information regarding about how KPI's will be monitored, including what evidence will be available to demonstrate that benefits and measures previously identified have been achieved, at both a Network level as well as a Contract / Unit level.
- We understand the discrepancy between the passenger trip targets listed in this report (150m boardings by 2031), compared to the 550m target which was set as part of the Auckland TERP. However we would like to see more detail around where the 150m figure has been derived from and why this figure was chosen as the goal for AT.

Transport organisations and advocacy group feedback

Auckland Airport

Auckland Transport
20 Viaduct Harbour Avenue, Westhaven
Auckland, 1010
New Zealand
17 August 2023

Auckland's Draft Regional Public Transport Plan 2023-2031: Feedback Submission

Thank you for the opportunity to provide feedback Auckland's Draft Regional Public Transport Plan 2023-2031 (RPTP).

Auckland Airport is supportive of the proposed goals in the RPTP, which are aligned to Auckland Airport's goals as we rebuild our Surface Access Strategy, placing better travel choices at the heart of this strategy. We are also supportive of the short, medium and long-term focus areas specifically:

- Better public transport coverage in South Auckland.
- A new frequent service in Mangere and connector service to the Airport Oaks and Ihumatao area.
- Extension of the Airport Link service to Botany by 2027.
- Advocating for better inter-regional services.

Auckland Airport is a 24-hour operation with almost 50% of the ~15,000 employees on the wider Auckland Airport precinct employed in shift work, and many outside the public transport operating hours. Approximately one-third of the workforce lives in areas south of the Manukau Harbour making the Airport and surrounding industrial areas an attractive proposition for employment opportunities.

In April 2023 Auckland Airport conducted a precinct – wide “Journey to Work” travel survey. A key finding was that ~4% of respondents use public transport to get to work – much lower than the wider region. Participants stated the following attributes would encourage them to consider taking public transport as part of their commute:

- Better public transport connectivity to where they live (less transfers);
- Shorter journey time by public transport;
- Enhanced reliability of public transport services; and,
- More frequent services that align better with employee shift start and end times.

Auckland Airport considers it essential that the RPTP reflects a concerted effort to better meet the need of the workforce on the precinct and in surrounding industrial areas in addition to the passenger focused services that are currently on offer.

Auckland Airport would welcome the opportunity to work with Auckland Transport on:

- Improvements to the Airport Link and Route 38 services by:
 - o Increasing the hours of operation to support shift workers; and,
 - o Accelerating and expanding feeder services to increase the accessibility of public transport to the Airport.
- Providing on-demand public transport options provide more flexibility to support worker needs;
- Providing faster and more direct services to key hubs such as Onehunga and Otahuhu to increase the population within a reasonable travel time of the Airport; and
- Enhancing public transport coverage across the Auckland Airport precinct.

Yours sincerely,

Tim

Automobile Association (AA)

17 August 2023
Auckland Transport
Private Bag 92250
AUCKLAND 1142

Submission on Auckland's Draft Regional Public Transport Plan 2023-2031

1. The NZ Automobile Association (AA) appreciates the opportunity to comment on Auckland's draft Regional Public Transport Plan 2023-2031 (draft RPTP).
2. The AA currently has over 335,000 Auckland Members and throughout our 120-year history has advocated for the transport interests of our Members. Today our work reflects the wide range of interests of our large membership, many of whom are public transport users and cyclists as well as private motorists.
3. Generally, we survey Members to understand their views on policies and proposals and inform the position we take on them. Unfortunately, the one-month timeframe for commenting on the draft RPTP meant this was not possible.
4. This submission therefore has therefore been prepared by the Auckland-based members of our Policy and Advocacy team. It draws on a combination of our knowledge and experience of transport policy and Auckland transport issues and our direct experience as regular users of Auckland's public transport network.

Submission

5. The AA congratulates AT for putting together a draft RPTP that gives the right focus and emphasis to the city's key public transport challenges and opportunities within the very constrained funding environment the organisation is currently operating under.
6. We agree with the proposed vision, goals and most of the actions. In the sections below, we have proposed some changes be made to improve the contribution the final RPTP makes to the congestion, access, economy and environment components of the vision.

Current state of public transport services

7. We are pleased to see the excellent progress AT has made in rapidly recruiting bus drivers to get bus services back to their pre-Covid levels. We also note that while much remains to be done with achieving the same for ferry services and filling the skill gaps is more complex and challenging than it is for buses, good progress has been made with ferries too.
8. Unfortunately, the same cannot be said for train services which is extremely disappointing given the amount of investment in rail by the government and the region in recent years.
9. Like many Aucklanders we remain perplexed and disappointed at the length of time KiwiRail has programmed for the Rail Network Rebuild. Very minimal information has been shared with the public about why the programme needs to take as long as planned and how this compares with equivalent metro rail network programmes in other jurisdictions.
10. We are also frustrated at the seemingly almost daily network issues which are causing significant problems for rail passengers. Our perception is that they are much more frequent than was the case before Covid but as for the Network Rebuild, the limited availability of transparent information means we simply don't know.
11. We are concerned that the combined impact of both the rebuild and the ongoing network problems risks rail passengers giving up on rail for the long term. We assume AT is working hard to address these problems with KiwiRail but would urge AT to make sure it is pulling all its levers in this regard both through its contractual relationship and its relationship with KiwiRail as a key partner. Sharing more open information with customers about both issues and what AT and KiwiRail are doing to improve the reliability of current services would also be really helpful.

Position on key issues – Congestion charging

12. The AA agrees that there is a strong basis in economic theory for charging motorists for congestion costs and other external costs of motor vehicle use. However, we strongly caution AT against viewing congestion charging as a panacea for Auckland's congestion, low public transport and walking and cycling mode shares and emissions problems.
13. Despite its conceptual appeal, and the fact it has been in place in Singapore since the mid-1970s and London since 2003, it is important to note that congestion charging has to date only been introduced in a handful of cities around the world.

14. With the notable exception of Singapore – which has more people than all of NZ and a land area that is less than a fifth the size of Auckland – every other city that has introduced congestion charging has done so in the inner-city area only.

15. More significantly, no city that has developed primarily in the post-war era based on the high levels of access and mobility private motor vehicles provide, has introduced congestion charging – including none in the Southern Hemisphere.

16. In the AA's view, this simply reflects the dominant and essential role private motor vehicles play in providing access in less compact cities with thin public transport networks. In cities which have developed in this way it will take decades of land use change and development of the public transport network before there are realistic alternatives for most private vehicle trips.

17. AT's current RLTP, which presumably assumes more funding than is now available, makes clear this is very much the case for Auckland. The RLTP projects that by 2031 just over seven out of ten trips in Auckland in the morning peak will be made by private motor vehicles. It also forecasts that by 2031 Aucklanders will be able to access 158,000 more job opportunities within 30 minutes by car than they will within 45 minutes by PT. This underlines the absolutely critical role private motor vehicles will continue to play in enabling people to access economic opportunities, as well as for the wider success of the Auckland economy.

18. Given the widely scattered nature of both housing and employment locations across Auckland, we think it is a little naïve to assume that, even if significant additional funding could be made available, the city's public transport system could be scaled up to meet the demand displaced by widespread congestion charging, and to address the very significant inequities it would create.

19. Trips in and out of the inner-city account for nearly two-thirds of public transport use in Auckland. This indicates how thin on the ground public transport is everywhere else. It also suggests that while there may be a case for introducing congestion charging for trips in and out of the inner city, the case for extending it beyond the inner city is weak.

In line with other cities that have introduced congestion charging, Auckland's land use and travel patterns and the limitations of the city's current and planned public transport network, the AA recommends that the final RPTP focus on the potential for congestion charging in the inner city rather than wider Auckland.

Service planning and network design - network optimisation and bus priority

20. The AA agrees with the draft RPTP's statement that a major part of Auckland's growth will need to be accommodated within existing corridors and that this means increasing the number of people using key routes by making more efficient use of our existing roads.

21. We support reallocating road space to transit and bus lanes where there is clear evidence that it will meet this test. We do not support reallocating space based on other objectives such as choice or sustainability, unless this is supported by evidence that it will actually move more people because without this evidence, reallocation may actually increase congestion and emissions.

The AA recommends the final RPTP make clear that decisions to implement and extend transit and bus lanes will be driven by comprehensive evidence on location-specific trip demand (including changes in demand at different times of the day) to ensure that changes made in specific corridors will move the most people where they need and want to go in a timely manner.

Value for money – Proposed Fare Box ratio performance measure

22. The AA questions whether maintaining the fare box ratio performance measure at “at least 35%” between 2025 and 2031 is sufficiently ambitious for the following reasons:

- the pre-Covid fare box ratio was over 40% and the RPTP's fare policy includes balancing financial sustainability against other factors
- the draft RPTP is targeting more than doubling public transport annual boardings between 2023 and 2031 and the resulting increase in fare box revenue should be substantially more than the forecast increase in operating costs
- the draft RPTP places a strong emphasis on the need for significant additional funding to meet more aspirational public transport targets like those in the TERP and fare box revenue potential needs to included in the mix of funding sources to be scrutinised.

The AA recommends the final RPTP include more ambitious fare box ratio targets out to 2031.

Surveys

23. We commend AT for the public surveys it has undertaken to inform the development of the RPTP.

The AA recommends the final RPTP include a section about what AT learnt from the public surveys it commissioned to inform the development of the draft RPTP, as well as the online survey on the draft RPTP, and how what it has learned has been incorporated into the RPTP.

24. We also note that AT also undertakes ongoing customer satisfaction surveys which is used along with other feedback and research to “shape the design, management, and continuous refinement of customer experience and the PT system”.

25. The AA regularly surveys our Members on all aspects of the transport system, including public transport, and would be happy to share insights from the surveys with AT if that would be useful. The AA recommends AT undertake regular wider surveys of Aucklanders, alongside customer satisfaction surveys, to inform what improvements could be made to attract non PT-users to PT.

Closing comment

26. The AA appreciates the opportunity to provide feedback on Auckland’s draft RPTP. We would be very happy to meet the team responsible for finalising the RPTP to discuss our submission if that would be useful.

Big Street Bikers

Feedback on Auckland's Draft Regional Public Transport Plan 2023-2031 (RPTP)

Thank you for the opportunity to give feedback on the draft RPTP.

Introduction

Big Street Bikers (BSB) is a Tāmaki Makaurau-based company with social enterprise accreditation from the Ākina Foundation. BSB is working to increase access to and use of ebikes across Aotearoa. We provide secure parking, digital wayfinding, and charging facilities called Locky Docks that are a free public amenity delivered at no cost to ratepayers.

Across the motu we work in partnership with mana whenua, community groups, businesses, councils, and government agencies to offer people more transport choices and to promote active and public transport modes. The capital expenditure and recurring operational expenditure associated with the delivery and operation of the Locky Dock network is funded by BSB through partnerships with Waka Kotahi, Mercury, and the sale of third-party advertising content. Waka Kotahi's Transport Choices funding is also currently available to Auckland Transport for the installation of Locky Docks without digital screens.

There has been a noticeable increase in bike thefts acting as a deterrent to using a bike for short trips or for connecting with public transport services. Locky Docks promote the uptake of people riding by both removing the security concerns associated with parking bikes and providing bikepath maps to increase awareness of safe cycleways and quiet back streets. Locky Docks form a network at key destinations, including transport hubs, town centres, and community facilities.

BSB would like to work with Auckland Transport and local boards to leverage the funding currently available to roll out a network of Locky Dock stations across Tāmaki Makarau at transport hubs and ferry terminals by the end of 2024. Our feedback highlights how secure bike parking, wayfinding, and charging facilities support the RPTP's vision and goals.

Feedback on the RPTP

Big Street Bikers supports the vision and goals of the RPTP to increase public transport use to reduce congestion, improve access for Aucklanders, support the economy, and enhance the environment.

Our feedback is focused on Part 4 Actions (integrating PT into a growing Auckland) and in particular goals associated with supporting infrastructure to make it easier to get to and from PT. Big Street Bikers supports the need to improve the public transport network with supporting infrastructure including bike parking.

As AT has identified in the RPTP, getting to and from destinations while using PT is likely to take more than one mode of transport — multimodal integration is necessary, including the provision of secure bike parking. Secure bike parking will make access to PT safe, convenient, and pleasant, improving customers' experience of PT.

Big Street Bikers would like to suggest that Auckland Transport include in the final RPTP the action to install "secure bike parking, wayfinding, and charging stations at transport hubs and ferry terminals" as a short-term deliverable and focus (rather than waiting for further investigation). With the funding currently available, AT could deliver on this action by the end of 2024. Transport Choices funding gives AT the option to take an innovative approach to installing stations without digital screens at sites agreed with Waka Kotahi. In order to secure Transport Choices funding, installation needs to occur before June 2024. The proposal to install supporting infrastructure with the funding currently available by the end of 2024 supports the overall vision of the RPTP and contributes to other goals including:

- A safe and accessible transport network for everyone, by making it possible for a greater range of the community to access AT Metro services. Locky Docks increase safety of the transport network and encourage those who are transport disadvantaged to access services. Locky Dock stations are designed to meet CPTED principles for safe infrastructure and each station is equipped with additional features such as CCTV to respond to safety concerns of customers.

- Enhancing the environment and tackling the climate emergency. By delivering secure bike parking, AT will be working towards the goals set by Auckland Council in the Transport Emissions Reduction Pathway (TERP) without the need for any additional investment.

- Funding and delivering public transport transparently. We recommend that Goal 5 includes the action to leverage the funding available to provide for secure bike parking (page 52).

Additionally, Locky Dock stations support AT's Wayfinding policy (Goal 1) by supporting customers to confidently move around the city. Waka Kotahi currently has Transport Choices funding available to assist AT with the design and display of accurate wayfinding maps on Locky Dock station screens.

Finally, we ask that completion of the Cycle & Micromobility Strategic Network adjacent to the rapid transit stations is moved from "aspirational" to an immediate timetable in order to meet Tāmaki Makaurau's climate goals. Safe, inviting, convenient, all-ages, all-abilities access to and from public transport is essential to the operation of the overall transport network. AT will only meet the TERP goals if Aucklanders are provided with safe and attractive travel choices which support a shift away from car travel and reduce emissions. BSB supports AT using the tools available (such as reallocating road space and the installation of tactical materials to create bike lanes) to quickly and cost-effectively deliver the network within existing budgets. This should be reflected in the plan to support the vision of the RPTP.

Bike Auckland

Regional Public Transport Plan 2023 – 2031

This feedback is on behalf of an organisation: Bike Auckland

Summary

Overall this is a good plan. Bike Auckland supports almost all of it. The RPTP focuses mainly on public transport; this is not ideal, as Auckland needs to plan for a fully interconnected active and public transport network. Auckland Public Transport does not have the funding to deliver the public and active transport infrastructure Auckland needs. Without adequate funding for this network and supplementary infrastructure, the network will be massively less effective, and will not achieve its Transport Emissions Reduction goals.

Main Points

The five main goals outlined in the RPTP are:

1. Improved service (frequency, reliability, convenience of public transport)
2. Reduced carbon emissions
3. Safety and accessibility
4. Integration with cycling/walking and with more houses/businesses near public transport
5. Funding and transparency, including advocating for more funding

These are all splendid goals that Bike Auckland can get behind!

Where it relates to cycling:

The RPTP touches on integration with cycling networks in multiple places:

- "If integrated properly with other modes, including walking and cycling, PT has strong potential to become the preferred travel choice for many more Aucklanders, for a wider range of trips" – page 8 – Agreed!
- "When planning PT, we must therefore ensure it is easy to get to and from PT stops and stations by other modes of transport. This can include improving footpaths near bus stops, increasing the number of secure bike parks at a transport hub, and better managing park and ride facilities." – page 10 – Nice!
- "... smaller scale changes to infrastructure that helps people get to PT, like improved footpaths or bicycle parking at stations" – page 16 – Effective!
- "We also need to provide better and safer connections to and from PT stops, stations, and ferry terminals. This includes upgrades to the walking and cycling networks" – page 28 – For sure!
- "Ensuring that all new ferries used on contracted services comply with the Ferry Standard for New Ferries used in Urban Passenger Service and any approved additional requirements or approved exemptions for the Ferry Standard that AT has put in place. This will also improve the ability of ferries to carry bicycles" – page 41 – Terrific!
- "An important focus for AT will be working towards the goals set by Auckland Council in the Transport Emissions Reduction Pathway (TERP) within our available funding. We will invest in PT projects and services, walking and cycling projects, and other initiatives to provide Aucklanders with attractive travel choices, supporting a shift away from car travel and reducing emissions" – page 43 – "within our available funding" is an easy excuse to not take action. Please do not lean on that caveat. Otherwise, great stuff!
- "Increasing safety on all parts of the network, including following CPTED principles when designing infrastructure, enabling safe pedestrian and cycling facilities around PT stations" – page 45 – Excellent!
- "To improve customers' experience of PT, we therefore need to improve their experience of accessing PT. This access should be safe, convenient, pleasant, and fully accessible regardless of whether it is made on foot, on a bike or scooter, or in a car" – page 48 – Agreed!
- "Completion of the Cycle & Micromobility Strategic Network adjacent to the rapid transit stations" – page 48 – Outstanding!
- "AT is investigating improvements to rapid transit stations and ferry wharves, that will look to align with wider improvements to the transport network (such as connecting to new footpaths and cycleways)" – page 49 – Great!

Key Problems:

While the RPTP is overall good it has two significant limitations.

1. Firstly, the funding available is horrendously inadequate in achieving the Auckland Transport Emissions Reduction Pathway (TERP) climate target for 2030, which requires 550 million public transport trips per year. The RPTP only aims for 150 million per year (just over a quarter of that needed to meet the climate target). This is acknowledged in the document: “AT will continue to advocate for changes to these elements from Government so that the true potential of the PT system can be realised” (page 13).

This lack of funding seems unfair when one considers that subsidies for fossil fuels amount to \$1 Trillion worldwide, of which New Zealand’s share amounts to several billion dollars per year, given our country’s contribution to the world’s total GDP (see IEA, 2023) subsidy reform.

2. Secondly, the report focuses primarily on public transport, which makes sense, but it is imperative that we simultaneously interconnect the active modes network with the public transport network. If we plan for one without considering the other, our overall transport network will suffer. Auckland must develop a comprehensive plan for cycling/shared paths and public transport across the city. No aspect of transportation planning exists in a solitary bubble.

Recommendations

Bike Auckland also recommends:

- Separated cycle paths to all public transport hubs
- Wide, well-protected separated cycle paths to schools (optimising for child-friendly riding styles)
- Provision for bikes on buses, especially on rail replacement buses
- Better accessibility and greater capacity on ferries

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Brake, the road safety charity

Regional Public Transport Plan 2023 Submission from Brake, the road safety charity
All queries: Caroline Perry, NZ director, cperry@brake.org.nz 021 407 953 Brake, PO Box 133026, Auckland, 1146

About Brake

Brake is a road safety charity with global interests, and branches in the UK and New Zealand. It approaches road safety and sustainable travel using the Vision Zero method. That is to say, the charity considers that all deaths and injuries on roads are unacceptable, and eliminating carbon emissions from transport, which is the largest contributing carbon sector, should be approached with equal zeal. Brake's vision is a world with zero road deaths and serious injuries, where everyone can move around in safe and healthy ways, every day.

Brake promotes road safety awareness, safe and sustainable road use, and effective road safety policies. It does this through community activities, services for employers and fleet professionals, national campaigns, and coordination of national Road Safety Week.

Brake also cares for families bereaved and injured in road crashes. It does this by providing specialist support resources to families following a crash.

General comments on the RPTP

Overall Brake supports the actions of the draft plan. To meet environmental and safety goals, and cater to a growing city, Auckland needs to significantly improve its public transport system.

In addition to the actions set out in the plan, Brake would also like to see more actions to improve links between planned development such as new residential areas, and public transport links.

Several areas that have been developed in recent years have had to wait for a significant time to have public transport links, meaning families moving to those areas have had to be reliant on private vehicles, adding to congestion and emissions.

Providing more frequent and connected services

Brake supports these actions, however is concerned that some parts of Auckland, including some that are reasonably central, will still only receive local services such as one bus every 60 minutes post-2031.

To encourage people to swap their private vehicle for public transport or other modes of sustainable transport, those alternatives need to be nearby, easy to access, cheap and frequent. If we still have suburbs that require multiple connections to get to places, and have infrequent service, people are less likely to use these services and travel by public transport.

Making public transport even safer

Brake supports these actions but notes they mainly relate to the personal safety of passengers and riders.

Whilst travelling by bus and train are some of the safest ways to travel, in terms of road safety, the safety of the vehicles and drivers are also important. Brake appreciates this comes down to individual bus

companies, however we would like to see more work between Auckland Transport and the contracted bus companies to help make public transport even safer. For example, work around minimum safety standards for buses, including further protections for vulnerable road users like pedestrians and cyclists e.g. blind spot sensors and mirrors. To help keep drivers, passengers and other road users safe, further focus on driver safety such as fatigue and distractions, through driver training, technology, and journey scheduling, should be looked at.

Creating a low-carbon public transport system

Brake supports these actions, however, would like to see the uptake of lower/zero emission vehicles happen faster. If we are to meet goals to reduce carbon emissions, many actions need to happen more quickly.

Brake would also recommend including further actions to make those vehicles that still have tail-pipe emissions post-2031 more fuel-efficient. For example, through journey scheduling and fuel-efficient driver training.

Bus and Coach Association of New Zealand

Bus and Coach Association of New Zealand Submission on Auckland's Draft Regional Public Transport Plan 2023-2031

About the Bus and Coach Association of New Zealand

1. The Bus and Coach Association (BCA) has just celebrated its 92nd year as the voice of the road passenger transport industry, and currently consists of around 160 full members providing road transport services and around 75 associate members that are generally industry related suppliers.
2. BCA members deliver all Public Transport bus services in Aotearoa, 98% of the Ministry of Education school bus services and the vast majority of tour coach services. Our members employ over 13,000 people and provide critical road transport connections for New Zealanders to access employment, education and social opportunities; as well as providing tourists a safe, efficient and enjoyable way to move around New Zealand.

Our Submission

3. Thank you for the opportunity to provide a submission on Auckland Transport's (AT) draft Regional Public Transport Plan (RPTP). We have deliberately constrained our submission to the key strategic points we would like you to consider in finalising this draft.
4. We have taken this approach in part because this is a public consultation exercise whereas we see an important and ongoing relationship between AT and the BCA where we will be looking for ongoing opportunities to work with you on behalf of our members and in pursuit of our mission which is to foster efficient, sustainable and profitable growth of road passenger transport for the mutual benefit of Association members and all New Zealanders.

Feedback: Developing the Plan

5. We consider AT has done a great job of presenting this draft RPTP for public feedback. The material is well presented for multiple audiences, the timeline is clear and there are multiple ways of providing feedback.
6. We are happy to arrange a time to provide you a greater level of detail on feedback from our members or on the points we make in this submission should that be of value to you.
7. We have one concern we want to highlight regarding the timeline that sees the RPTP finalised in November 2023. We have concerns that the linkage the RPTP has to the RTLP and the Government Policy Statement on Land Transport could mean aspects of the RPTP may be out of date shortly after it is finalised.
8. While this is often the nature of these sort of plans, we encourage you to consider whether there is time to pause the finalisation of the RPTP to incorporate any impact that may result from the October election. This applies to the parts of the draft RPTP 2023-2031 that references current

Government policy. It would be unfortunate if these aspects remained in the final RPTP if they were no longer valid.

Vision and goals

9. The BCA strongly support the vision and goals of the draft RPTP 2023-2031. One of our key positions is that mode shift to greater use of public transport, walking and cycling will have greater social, environmental and economic benefits to all New Zealanders.
10. Where we are likely to have differing views is in some of the actions/change initiatives required to deliver on the five goals.

AT Position on key issues

11. The BCA recognises the constraints AT faces and the aspects of Auckland's transport system that AT doesn't control. The BCA broadly agrees with the positions set out within section 1.3, in particular the sustainability of the current funding model. While we won't always agree on the specific details, because we support the vision and goals in the draft RPTP 2023-2031, there will be many occasions where what we are advocating for will be aligned.
12. In these cases, we would like to work together. The draft RPTP 2023-2031 touches on some of these points such as the importance of driving being seen as an attractive career. The funding model is such that this is not possible to achieve this without the cooperation of all parties involved.

Actions associated with Goal 1: Services providing an excellent customer experience

13. Driver shortages. The BCA acknowledges the detrimental impact of recent driver shortages on Auckland. We also want to recognise the role of AT in sharing the increased costs required to lift wages to a more sustainable level. In conjunction with changes to immigration settings, this has enabled our members to largely address the immediate issue.

14. However, for Auckland to have the public transport network that it aspires to, more work will need to be done to support a sustainable workforce that can expand to meet the increased task. This will require further investment and collaboration between the various parties to improve working conditions, specifically through timetabling improvements to minimise split shifts and enable access to suitable rest facilities for breaks; and improved health and health and safety measures to protect drivers from anti-social behaviour.

15. The BCA considers the RPTP should include a strategic initiative/action focused on how drivers are valued, kept safe, appropriately remunerated, recruited and retained to match forecast demand. Should you agree, this is a piece of work we would like to work with you on further in 2024 and we think reflecting it as one of the actions under the final RPTP is appropriate.

16. This could be a medium-term focus and could easily sit under Goal 1. We think that without focusing on this, there is a risk of that customer experience could suffer again from supply-side shortages.

17. Increasing services including night services. We support making public transport available to more people for more of their journeys, but it will be important to work through technical impacts of increased hours of service provision, as well as staffing. An example might be the need to consider the impact on current overnight vehicle battery charging patterns and or the infrastructure/asset mix needed to support extended services. Another is the difficulty in staffing night shifts due to antisocial hours and the increased personal safety risk. We would like to work with you on scoping these impacts early, so our members are well positioned to respond.

18. Infrastructure improvements. We support infrastructure improvements to enhance bus journey times and improve comfort for passengers.

Actions associated with Goal 2: Enhancing the environment and tackling the climate emergency

19. The BCA strongly supports this goal but want to ensure an evidence-based approach is taken. To

best minimise the impacts of transport on the environment, the primary focus should be on encouraging modeshift to active and shared modes.

20. Reducing emissions and embodied carbon. The BCA supports AT's desire to decarbonise the public transport fleet. Decarbonising the public transport fleet must consider not just tail pipe emissions, but also the whole of life environmental cost associated with the manufacture and disposal of vehicles and batteries. We note that the plan includes that embodied emissions are reduced by 50% by 2031, however it only seems to refer to infrastructure and doesn't seem to be factored into any proposed actions relating to the bus fleet.

21. The BCA is concerned that the desire for a swift move to zero emission vehicles, combined with the short contract cycles and heavy procurement weighting to cost, will see modern high-quality, low-emission vehicles made obsolete too soon. They risk being replaced by low-cost, shorter lifespan buses that are fully depreciated over the 9-year contract period, due to uncertainty about vehicle usage post contract. Climate change is a global problem and ignoring emissions generated offshore in the manufacturing of vehicles or the cost of disposal is not an appropriate way to tackle the climate emergency.

22. We would like to work with AT to develop procurement processes that support the deployment of responsibly manufactured high-quality zero emissions vehicles with a 20-year life in the New Zealand fleet, thus reducing embodied carbon.

23. We recommend that to give the final version of the RPTP longevity, you amend some of the actions that support the goal. An example is this, "All buses to be low-emission by 2035 – to align with Government's mandate" which sits under the title of, "What we plan to achieve by 2031", even though the target date stated is 2035. This could have the same intent but be more enduring if it was presented as, "Continued transition of public transport buses to a low emissions fleet in line with Government policy."

Actions associated with Goal 3: Safe and accessible transport for everyone

24. The BCA strongly supports this goal and by everyone, we take that to include our members' staff.

25. The surge in incidents of antisocial behaviour targeting drivers and passengers has and will continue to impact both driver retention and patronage levels if not addressed. We support the on-going safety actions outlined in the draft RPTP 2023-2031 and think there is further work we can do together regarding safety on-board buses for the benefits of our drivers and passengers. You may wish to consider including a specific action in the final RPTP that aims to address this.

26. We acknowledge that AT alone is unlikely to be able to resolve this issue, but you can play a leadership role in uniting stakeholders to devise effective solutions. We would offer you our full support at both a national and regional level on this matter.

Actions associated with Goal 4: Integrating public transport into a growing Auckland

27. We suggest correction of the typo on page 28 by dropping the word, "Transport" in the heading. This created us some initial confusion on why you sought to integrate public transport into a growing AT.

28. We support improved integration between modes, and urban form that supports shared and active modes. We encourage early consultation with bus operators on planned service changes and infrastructure changes to ensure continued efficient services.

29. We suggest AT consider developing strategically located rest and charging facilities. Operators should continue to provide facilities for management, bus stabling and maintenance, at locations that best suit them. This approach would enable more efficient service delivery with the planned increased hours of operation and improved driver conditions, while the more agile private sector manages property as it sees fit, recognising that operators use depots to provide other services, i.e. servicing Ministry of Education routes and charter services which benefits AT by splitting infrastructure overheads.

Actions associated with Goal 5: Funding and delivering public transport transparently

30. The BCA strongly supports your plan to, "enhance and compliment the services we provide through greater collaboration with operators and private providers". We are available to help you in achieving this, and strongly believe that the expertise held within our sector can benefit Auckland Transport in delivering improved and more efficient services.

31. The best way to improve farebox recovery is to increase patronage and make service design improvements to better match passenger demand, however, there are also efficiency opportunities within how contracts with transport providers are structured. We would welcome a discussion on improved partnering, (including greater transparency), and the types of contractual arrangements that could better deliver against AT's objectives.

Summary

32. In summary, the BCA:

- a. Appreciates the work AT has done to date that has resulted in the draft RPTP 2023-2031,
 - b. Strongly supports the vision and goals included in the draft RPTP 2023-2031,
 - c. Urges AT, if at all possible, to delay finalising the RPTP so that it is consistent with any incoming government's Land Transport policies,
 - d. Recommends AT continues working with the BCA and our members to better understand the challenges and opportunities that service delivery changes bring, to ensure choices are workable and represent good value for money to the rate payer, and
 - e. Recommends the following changes to the draft RPTP 2023-2031:
 - i. Including a Driver workforce initiative under one of the RPTP's goals with a medium-term focus to signal commitment in this area,
 - ii. Reducing the focus on tailpipe emissions and signal you are thinking about emissions on a whole of assets lifecycle basis, and
 - iii. Amending actions like "All buses to be low-emission by 2035 – to align with Government's mandate" such that the final RPTP is more enduring.
33. We are happy to arrange a time to provide you a greater level of detail on feedback from our members or on the points we make in this submission should that be of value to you.

Campaign for Better Transport

Auckland Transport
AUCKLAND
Sent via e-mail
Dear Sir/Madam

REGIONAL PASSENGER TRANSPORT PLAN

The Campaign for Better Transport Incorporated (CBT) wish to put forward our submission in relation to the Regional Passenger Transport Plan. We are broadly in favour of the aims of the Plan but wish to make specific comments below.

24/7 Bus Services

In addition to the aims listed in section 2.4, the CBT would like to see Auckland Transport aim to introduce 24/7 service on key corridors. Our initial thoughts are that five routes, being routes NX1, WX, 25L, 70 and the Inner Link would be prime candidates for 24/7 services, with eventual expansion to cover other higher demand routes. The CBT envisages that such services might run to hourly frequencies between the hours of midnight and 6am and would primarily ensure that shift workers in places such as Auckland Hospital and the Auckland Central Business District would have a way of getting to and from work that would not require them owning a car. We note measures planned for implementation by Auckland Transport would ensure the safety of bus drivers, and we acknowledge there would be some additional cost to provide suitable security aboard the buses for passenger safety and comfort.

If 24/7 service is not considered, the CBT is concerned that people would still want to own a car to cover those trips that are outside the service window for public transport – which then creates its own set of cascading issues. Examples of locations with 24/7 public transport service include Sydney with an extensive network of night services running seven days a week.

The CBT also considers that the aims listed in section 2.4 should be implemented in the following order:

1. Increase the base frequency on connector routes from 30 minutes to 20 minutes.
2. Expand the hours of frequent network operation from 7am – 7pm to 6am – 11pm.
3. Add more routes to the frequent network.
4. Improve the all-day frequency on frequent routes from every 15 minutes to every 10.
5. Significantly expand the rapid transit network.

Train Trip Times

When electrification was first mooted for Auckland nearly twenty years ago, one of the comments often made was that trip times would be faster with electric trains. Yet nearly ten years on since the introduction of electric trains in Auckland, it is disappointing that trip times on the electric trains are slower than the diesel trains they replace – for instance, a Southern Line journey from Papakura through to the City takes 50 minutes now compared with 47 minutes in 2005. While Auckland Transport proposes the introduction of an Express service post City Rail Link for the Southern Line, we expect this will be peak only and would not provide a rail service that is time competitive with driving all day, every day. Work is needed to ensure all stops journey times are reduced, noting that this was achieved with the former diesel fleet.

Attitudes to Public Transport

One of the often-cited advantages of car ownership is the freedom that it offers. When Auckland Transport uses language such as “plan your journey”, it implies that public transport does not offer the same freedom that car ownership offers and that therefore it is an inferior mode of transport. We would like to see Auckland Transport change its language to make public transport appear to offer an equal level of freedom to car ownership and this can start by dropping language such as “plan your journey”.

Fare System

The CBT is somewhat concerned about the present design of the fare system. The zonal system was well designed for the era in which it was originally designed (the mid to late 2000s, even though implementation did not take place until some years afterward), but with cash fares having been scrapped since 2020, the need for a zonal system has diminished and there is a case to be made for a distance-based fare system.

Lengthy trips within a single zone are cheaper than shorter trips that cross a zone boundary. By way of example, someone living in a suburb such as Otara and working retail at say Sylvia Park ends up paying more for public transport than someone living in a suburb such as New Lynn and working a white-collar job in say Newmarket, even though the latter is travelling a longer distance than the former.

In addition, such two zone fares are often not price competitive with driving. Inland Revenue estimates the marginal cost of using a petrol car is 34 cents a kilometre¹. As such, a two-zone fare is only cheaper for driving where the distance travelled is 12.35 kilometres or more². The retail worker living in Otara and working in Sylvia Park ends up paying more for public transport than the marginal cost of driving.

We are also concerned that the off-peak discount offered is a miserly 10%.

The CBT would like to see consideration made to replacing the zonal system with a distance-based fare system and for more dynamic off-peak discounting to encourage uptake of public transport. Done well, this could achieve the triple aims of increasing public transport patronage, decreasing public transport costs to users, and increasing farebox revenue.

Friday Services

The CBT would like to see Auckland Transport monitor the level of peak public transport usage on Fridays. With some degree of working from home having become embedded in the professions, our observations are that peak public transport usage on Friday is noticeably lower than on other weekdays and a case could be made for not having as many additional peak services on a Friday compared with other weekdays. We emphasise that there should not be a reduction below baseline service levels but instead the extra services during peak.

Connectivity

One of Auckland Transport's aims is to have a connected network. The CBT is concerned that in many key places, there are not good connections between services.

For instance, Downtown bus stops are spread over several streets making connections between services difficult, especially in inclement weather. As an example, someone transferring from a Botany bus to a Northern Express bus has a nearly half a kilometre trek, including crossing three roads. Ten years ago, that same passenger could make the same transfer travelling only a third the distance (140 metres) and was theoretically possible without crossing a road, but at worst only needed the crossing of one road.

Likewise in the suburbs, there are considerable gaps at logical transfer points. For example, someone wanting to transfer from the Balmoral Road crosstown (the 650) to a Mount Eden service (the 27) must walk half a kilometre to make their transfer.

The CBT would like to see more work done to provide better transfer points that do not require such lengthy treks and consider Auckland's inclement weather.

Onehunga Line

The CBT is firmly opposed to any plans to permanently remove Onehunga Line from the Auckland CBD. Contrary to what Auckland Transport stated publicly, we understand that a majority of Onehunga Line passengers were travelling through to the Auckland CBD and not to Newmarket or the other stations in between. We predict that any removal of the Onehunga Line from the Auckland CBD will be the death of rail service for the residents of Onehunga and Te Papapa.

Southern Line

The CBT is somewhat concerned about the proposed routing of the Southern Line post the City Rail Link. We consider that Southern Line services from Pukekohe and Papakura should run into the City Rail Link in a counterclockwise direction and that Southern Line services from Otahuhu (and in our view, Onehunga) should run into the City Rail Link in a clockwise direction.

Ferries

The CBT would like to see ferries treated in like manner to buses and trains when it comes to funding and fares. We appreciate this requires legislative change and we trust that Auckland Transport will advocate for such change with central government.

Transport Emissions Reduction Pathway

We note the Regional Passenger Transport Plan acknowledges the Transport Emissions Reduction Pathway's ambitious patronage target and that under current settings it would not be possible.



Nevertheless, we would like to see what Auckland Transport considers would be necessary to achieve the target and the cost base so that Auckland residents could lobby Auckland politicians to advance the steps necessary to achieve the ambitious patronage target that has been set forth by Auckland Council.

If Auckland Transport have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully

The Campaign for Better Transport Incorporated

EV Maritime Ltd

Vision

The vision is on the right track but needs some minor changes

We would add to this vision a recognition of AT's leadership role, especially in modelling positive climate action (which we think AT generally does well).

Goal 1: Customer experience

The goal is great as it is

We concur that this is a good description of excellence in customer service in PT

Goal 2: Environment

The goal is on the right track but needs some minor changes

Public transport should also model positive climate action

Goal 3: Accessibility

The goal is great as it is

Goal 4: Growing Auckland

The goal is on the right track but needs some minor changes

Where possible, it should be recognised that there is value in providing a choice of PT options

Goal 5: Funding

The goal is on the right track but needs some minor changes

We support all these goals, although the support of Māori identity and outcomes seems to fit more naturally in other areas

Policies

1.1 Service Planning Principles: should include Sustainable

1.3 Service Optimisation: it is not clear whether this scale (very low through very high) applies equally to buses, trains and ferries. Given the end-to-end nature of ferries (in contrast to the multi-stop nature of buses and trains) would justify a different approach.

1.7 Service monitoring: public access to this level of information is very valuable.

3.3 Service Performance Standards: punctuality incentives need to allow flexibility to prevent perverse outcomes, such as a bus/ferry connection being missed due to late arrival of one service and on-time departure of another.

4.6 Audio on PT: service announcements should be kept brief to minimise intrusion and noise pollution to passengers.

5. "Low" emission needs to be better defined. AT is at risk of being accused of greenwashing by what appears to be deliberate avoidance of emissions targets for ferries. Note that hybrid (even plug-in hybrid) is not necessarily low emission, in and of itself. This is because a hybrid

vessel is heavier and therefore more energy intensive than the equivalent modern diesel ICE vessel. So, although a plugin hybrid will derive only a portion of its total energy demand from diesel, the total energy demand is higher, undermining the emissions reduction in real terms. Determination of the real reduction is more complex than simply considering the proportion of clean energy.

9.1 Fare Principles: weekly fare caps are a good initiative, not only to incentivise regular use of PT but also to drive social equity (given poorer residents often have to travel further).

11. Multi-modal access: focus needs to be brought to improving and securing the gains made in integration of PT modes to make multi-mode PT journey connections more reliable. Bikes and scooters should be allowed aboard PT wherever possible, including ebikes.

13.7 Funding mechanisms: AT should enable and encourage the deployment of private capital, especially where AT's own access to capital is constrained. In particular AT should prioritise quality, sustainability and total cost of ownership of its PT assets ahead of initial capital cost.

Current problems

The initiatives need significant changes

Not all cancellations are caused by driver shortages, especially on the ferries.

There are two other key problems with ferries. One is reliability, the other is weather sensitivity.

Replacement of old assets, and transition from diesel to electric, will improve reliability, however more could and should be done to enhance vessel reliability through systems redundancy, data-led maintenance and design-led reductions in accidental damage. These improvements cost money initially, but they underpin the reliability which will drive the mode shift which AT is seeking.

Weather is also often blamed for ferry service cancellations. Some believe that this is sometimes an excuse to mask crew shortages or breakdowns: if this is true then this needs to be addressed and transparency restored.

Suitability of ferries for their routes is also an issue and EV Maritime's position is that better boats could operate in a wider weather window, significantly reducing the necessity for weather-related cancellations.

Frequent services

The proposed actions need significant changes

GULF HARBOUR

EV Maritime does not support the discontinuation of the Gulf Harbour ferry service, for the reasons outlined below.

FERRIES OFFER MORE ATTRACTIVE COMMUTING OPTIONS

Firstly, a ferry is not just a floating bus. Passengers who currently take the ferry will not necessarily choose to take the bus, simply because the ferry is discontinued. When

operated reliably, ferries offer an attractive transport mode for commuters, especially on longer routes such as Gulf Harbour. In many respects, they make it viable for people to live in more distant places while working in the city. In contrast to private cars, buses and trains, in which opportunities to use commuting time productively are minimal, ferry commuters often work while aboard. Taking a laptop on a twice-daily 50-60 minute ferry trip gives commuters up to two hours of quality working time which is invaluable to their daily productivity and means those passengers no longer fret about the length of their commute, because it is part of their working day. Other passengers choose to enjoy the view, and occasionally the fresh air, enjoying their commute for the mental health benefits of taking a break in a natural environment. Ferries are also gathering places for communities, in which friends are made through the shared commuting experience. It is common to see people meet up with mates on the ferry and share a coffee or an after-work drink.

There are also strong synergies between ferries and active transport modes. Whereas buses and peak-hour trains are unable to carry bikes, ferries have always carried them and priority for cycle racks is ever growing in ferry service strategies. We see this strengthening with the growing uptake of electric bikes and scooters which make it practical to ride further from home to the ferry, or further from the ferry to work.

Furthermore, we have observed that the Gulf Harbour ferry appears to be the most cancelled of all services, often not for weather reasons. The systemic unreliability of this service from a passenger perspective undoubtedly casts a negative influence on passenger demand. While some weather related cancellations may be inevitable, selection of more suitable vessels could widen the viable weather window for Gulf Harbour ferry services, slashing the number of necessary weather related cancellations, thereby improving service reliability and further increasing uptake.

GULF HARBOUR IS A HIGHLY UTILISED FERRY SERVICE

According to AT's own data (2019, which excluded Devonport and Waiheke), the Gulf Harbour ferry service had the second highest number of boardings per sailing after Half Moon Bay, slightly ahead of Hobsonville (Gulf Harbour recorded 182,204 boardings on 5,000 annual sailings for 36 pax average per sailing. Half Moon Bay recorded 341,153 boardings on 7,910 sailings for 43 pax average per sailing. The total for the fleet was 1,513,153

boardings on 64,422 trips for 23 pax average per sailing (AT, 2019)).

Of all AT ferry services in that year, Gulf Harbour delivered the greatest number of passenger kilometers travelled at 5.237M pkm (slightly beating Half Moon Bay at 5.223M pkm).

Although Gulf Harbour is the second highest emitting of the AT services (after Pine Harbour, both in total and per passenger), this is because it is much longer than the other trips and delivered at a high average speed. When compared with the emissions of equivalent private vehicle trips between the same end points, Gulf Harbour performs similarly to Hobsonville (Hobsonville ferry service represents 9.5 kgCO₂e/pax per one-way trip, which is 50% higher than equivalent single occupancy car journeys which would represent 6.4 kg. Gulf Harbour ferry service is 18 kgCO₂e/pax per one way trip, which is 46% higher than equivalent single occupancy car journeys which would represent 12.3 kg).

In EV Maritime's opinion, these are not reasons to discontinue the Gulf Harbour ferry: they are reasons to decarbonise it. Electrification may appear expensive on this route because it requires a relatively large number of vessels and significant charging infrastructure, but its annual emissions are an order of magnitude higher than those of Bayswater, and five times greater than Birkenhead – both of which are slated for electrification. Based on the work we have done, our expectation is that the emissions abatement per dollar of investment may look strongest on the mid-harbour routes (Half Moon Bay, Hobsonville, maybe West Harbour), but this would be followed next by outer harbour (Pine Harbour, Gulf Harbour), with inner harbour last.

Electric ferries can deliver all these journeys, given adequate recharging facilities and schedule. EV Maritime has developed ferry service options which would enable the delivery of all AT ferry services, including Gulf Harbour, to AT's schedule objectives, on a full electric basis.

We also suspect that a change to the way the Gulf Harbour service is run, back to having vessels overnight at Gulf Harbour (as they do at Pine Harbour) would be a significant contributor to the viability of electrification for this service.

TE ONEWA NORTHCOTE POINT

EV Maritime is feels that insufficient evidence has been provided in support of the proposal to discontinue of the Te Onewa Northcote Point Ferry service and, as such, the proposal may be premature. We understand that passenger

	<p>number on this route may be small but we expect that this is likely related to the unreliability of this service. We feel that this unreliability could be a direct result of the unsuitability of the wharf infrastructure for the weather conditions. It may be worth exploring options to improve the reliability of this service before cancelling."</p>
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Travel times

<p><i>The proposed actions are on the right track but need some minor changes or additions</i></p>	<p>We support making PT trips quicker, although we believe that, in most cases, increasing frequency is of greater value than increased speed (if one had to choose between the two). On ferries, we support moves to separate "side trips" from core routes. For example, we support Birkenhead being a direct service to Downtown (removal of Northcote Point from this route) and propose that Hobsonville Point should also be a direct service to Downtown (without Beach Haven). We would then propose that Northcote Point be a stand-alone service to Downtown (if it can be justified) and that Beachhaven have a shuttle service to Hobsonville (again, if it can be justified).</p>
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Cheaper fares

<p><i>The proposed actions are great as they are</i></p>	<p>Fare price does matter. EV Maritime's entire staff use either active or public transport modes in our commute and we certainly noticed the removal of the half price fares. Nevertheless, we would support increased frequency over reduced ticket price, if we had to choose between the two.</p>
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Communications and technology

<p><i>The proposed actions are great as they are</i></p>	<p>This is great, if we can afford it. But it doesn't seem like the highest priority for spend.</p>
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Accessibility needs

<p><i>The proposed actions are great as they are</i></p>	<p>NB: No further comments</p>
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Weather resilience

<p><i>The proposed actions are on the right track but need some minor changes or additions</i></p>	<p>The actions are good, but more could and should be done to improve the suitability of ferries for poor weather. Not all weather conditions can be met, but a small change in the weather window would make a large change to the number of services cancelled. This should be a higher priority, in support of improved service reliability.</p> <p>Maintaining a range of PT options is another important element to overall network resilience. When ferry and</p>
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connector bus cancellations were a problem in late 2022, a lot of load transferred to the trains. Now that the trains are impacted by Kiwirail repairs, ferry demand seems to have increased (on Half Moon Bay at least). Providing a variety of mode options provides a level of resilience which helps commuters reduce the number of cars per household because commuters have more confidence that there will be a PT option which will work for them, even when things go wrong occasionally."

Low carbon

The proposed actions are on the right track but need some minor changes or additions

"The trajectory is good, but the specifics are unnecessarily and unhelpfully vague. Targets for ferry emissions should be more specific. Setting a target for number of "low emission" ferries does not provide sufficient guidance to AT staff or industry around AT's ambition or expectations for ferry emission levels.

With reference to 3.3 goal 2, RPTP states: "AT's PT services (buses, on-demand services, ferries and trains) emissions are reduced by 47% by 2031 (compared to a 2021 baseline), with bus emissions reduced by 64%".

Reducing emissions by 47% while simultaneously increasing PT services will require greater than 47% reduction in the per km emissions of the fleet. Given the planned growth in PT services by 2031, what do these absolute emissions reductions represent relative to status quo fleet composition?

47% and 64% are quite precise numbers, inferring that some analysis has been done to determine the pathway to achieve this. It would be helpful to share this analysis, in particular the roll out of hybrid and zero emission buses and ferries and assumptions about the emissions.

With reference to 3.3 goal 2, RPTP states, "All buses to be low-emission by 2035 - to align with Government's mandate"; "Transition to a low-emission ferry fleet with 50% of the fleet to be low emission by 2031."

Define "low emission". Note that hybrid (even plug-in hybrid) is not necessarily low emission, in and of itself. A hybrid vessel is heavier and therefore more energy intensive than the equivalent modern diesel ICE vessel. Although a plugin hybrid will derive only a portion of its total energy demand from diesel, the total energy demand is higher. Determination of the real reduction is more complex than simply considering the proportion of clean energy.

AT is at risk of being accused of greenwashing by deliberate avoidance of emissions targets for ferries. This

risk is unnecessary and could be resolved by providing more clarity and transparency.

RPTP states, "Embodied emissions are reduced by 50% by 2031 (2021 RLTP capital & renewals programme baseline)"; "Ensure all PT capital investment projects consider embodied emissions and aim to minimise these as much as practicable."

More clarity here would be helpful. Minimisation of embodied emissions is laudable, but needs to be taken in context of the whole of life emissions. It will often be more sustainable to accept higher embodied (production phase) emissions in exchange for lower operating (use phase) emissions. By way of example, electric vehicles will have higher production phase emissions than diesel vehicles, but clearly have lower emissions on a whole of life basis. Considering and prioritising embedded production emissions out of context is the emissions equivalent to considering only the capital cost of an asset without considering its whole of life cost. Accountants use Net Present Value and similar measures to consider the value of future costs and savings relative to initial capex differences. A similar approach would be valuable when considering initial vs through-life emissions.

It is also desirable to select for longevity. A policy of procuring longer lasting assets will result in lower embodied emissions over time. For example, choosing 33 year assets over 25 years assets requires 2 rather than 3 replacements over a 100-year view.

With reference to 4.2 Goal 2 Actions, RPTP states: "Ferry - AT will continue and expand its ongoing efforts to decarbonise the ferries. AT has recently confirmed crown funding for two fully electric ferries, which will be operational by 2024, beginning the journey of decarbonising the ferry fleet. A further four new low emission vessel builds are underway with further procurements planned for 2023/2024. AT has been working with operators to ensure that their ferry fleet also transition towards low emissions technology options like electric, plug-in hybrid and hydrogen."

We don't believe this is accurate. There are four in build in total: the two crown-funded (EV Maritime) electric vessels and two diesel hybrids.

RPTP states: "Embodied carbon and climate mitigation - AT has target of reducing 50% of embodied emissions by 2031 associated with physical infrastructure and maintenance work. All projects will assess material use efficiency and design innovation in order to minimise the impact on the environment."

Previous RPTP provided specific information about service frequency intentions. This enabled businesses like EV Maritime to develop the fleet-system analysis which has played a major role in underpinning AT's electric ferry rollout. Hiding this data from the public not only reduces transparency but also curtails industry's ability to contribute to AT's strategic process outside of a formal (usually paid) consultancy project context.

We further note that AT's ambition for zero emission bus fleet by 2035 is not matched by ambition in ferries. These could and should also be zero (not just low) emission by 2035."

Specific routes: Gulf Harbour

We oppose the removal of this route for the reasons explained in detail earlier in this submission.

Specific routes: Other routes

We do not have sufficient information to support the removal of the Northcote ferry service (although we support its separation from the Birkenhead line).

General comments on RPTP: Multimodal integration

Better integration between PT modes is very important. For example, the 735 and 734 bus services which connect with the Half Moon Bay ferry are excellent. However when one or other service is running a few minutes behind, a lack of coordination between GoBus and Fullers sometimes sees the ferry depart before the bus arrives, or vice versa. The risk of this occurring severely undermines the viability and attractiveness of choosing a joined-up PT journey, particularly given the infrequency of both services. If AT can get this right reliably, it opens the door to families owning fewer cars, further cementing the role of PT as their core transport mode.

Fullers360

Auckland Transport
Regional Public Transport Plan Team
By email: rptp@AT.govt.nz

Tēnā koe

RESPONSE FROM FULLERS GROUP LIMITED (FULLERS360) ON AUCKLAND'S DRAFT REGIONAL PUBLIC TRANSPORT PLAN 2023-2031

We refer to Auckland's Draft Regional Public Transport Plan 2023-2031 (RPTP) which details Auckland Transport's (AT) plan for the public transport network, Auckland region. This letter is Fullers360's response to AT's invitation to provide feedback on the RPTP as part of AT's public consultation process.

Our feedback primarily addresses AT's stated intention to take over the Waiheke Ferry service MTIA route comprising the Ferry Terminal Downtown, Auckland to Matiatia, Waiheke Island ("Waiheke Ferry service") and also Part 7 – Service Plan of the RPTP, including other aspects of the RPTP that impact ferry services. We want to be clear at the outset that we are not in negotiations with AT for the Waiheke Ferry service – Fullers360 remains the operator of this service.

Summary of key points

The current RPTP developed by AT promises to have listened to the concerns of Aucklanders and in an attempt to solve public transport issues, purports to have formulated a plan to improve public transport by growing an integrated, high performing, and accessible public transport network that is safe.

For reasons explained below, Fullers360's view is that the RPTP while ambitious, represents (in some respects) an over-committed, over-extended AT that risks fundamental under-delivery (based on previous performance). In the case of the long standing commercially operated Waiheke Ferry Service, AT appears motivated by commercial outcomes by proposing to take over an exempt ferry service from a private business, rather than considering what "good" should look like for Aucklanders:

(a) Core infrastructure required to support Auckland's integrated public transport network is decades of development behind where it should be, yet AT is promising to resolve perceived historic and current issues for Waiheke Island, the majority of which stem from AT's underinvestment and maintenance in core infrastructure.

Instead, AT proposes taking over Fullers360's commercial Waiheke Ferry service without providing meaningful, strategic, sustainable, and appropriate infrastructure investment, which appears entirely driven by short-term commercial drivers, rather than delivering improved, transparent, public transport outcomes for Aucklanders in the medium and long-term. (b) Auckland Transport's Matiatia wharf and ferry terminal at Waiheke Island has not been a fit for purpose facility for many years due to a marked lack of investment in the asset. Additionally, the wharf and landside infrastructure at the Downtown Ferry terminal for operation of the Waiheke Ferry Service is fundamentally inadequate to support the demand across the summer seasonal peak. By way of example, the eyesore "circus tent" like structure, that fails to provide customer protection from the elements across all seasons is not an appropriate solution for millions of unique customers per year. Investment ought to be fit for purpose given Waiheke visitation is the prime economic enabler for Auckland tourism and in our view, the heartbeat of the Hauraki Gulf.

(c) There does not appear to be any identified budget in AT's RPTP to deliver on any change to the Waiheke Ferry service.

(d) It is imperative that ferry operators are future focussed in respect of ferry and related technology, and more importantly, vessel safety. AT's proposal to introduce new standards for new-build ferries is completely inaccurate. The 2011 out of date vessel standards continue to apply. To be clear, new standards are not an AT innovation and rely on Fullers360 experience and knowledge in this area. Fullers360 operates in a regulatory environment that requires consistent innovation and dedication to safety by operators. We question whether AT appreciates the unintended consequences of the SPTF on ferry operations which AT intends to implement for public transport services.

Context: Fullers360 as operator of the Waiheke Ferry service MTIA Route

Before discussing each point above, it is helpful in the context of AT's apparent proposal to take over MTIA to detail Fullers360's longstanding history with the Waiheke Ferry service.

Fullers360 is a leading passenger ferry service operator in New Zealand. We launched the Waiheke Island ferry service in 1987 and have continued to invest in and evolve the Waiheke ferry service for almost 40 years without any funding from central or local government. We are immensely proud to have connected millions of visitors to Waiheke Island each year over several decades.

As part of our commitment to the service and our wider investment in our New Zealand operations, we also support local Waiheke businesses, are an active and dedicated promoter of Waiheke tourism, and a daily lifeline for residents and commuters to essential services and work in Tāmaki Makaurau Auckland.

To submit feedback to AT on the RPTP Proposals for specific public transport services/routes in the interactive online portal, specifically, a field seeks comments on:

Proposal for AT to take over the Waiheke ferry service (MTIA) route

In Fullers360's view, the Waiheke Ferry service appears to be unattainable for AT for reasons discussed throughout this letter. It is our position that AT's focus should be on good public transport outcomes (now and in the future) for Aucklanders as opposed to funding constraints.

Failure to act in good faith

At no point in time have Fullers360 directly been informed by AT of their proposal to take over the Waiheke Ferry service – a service that we operate and have heavily invested in for over 40 years. We were blindsided by this statement. It is disappointing that AT appear to have acted contrary to good faith and government procurement principles.

There appears to be a real lack of transparency and good faith on AT's behalf as to its future plans with the Waiheke Ferry service in its previous dealings with Fullers360. For example, in July 2022, Fullers360 and AT entered into a Public Transport Agreement for Auckland Ferry Services whereby Fullers360 would operate various ferry service routes to be contracted by AT. This agreement specifically excluded the Waiheke Ferry service as an exempt route under the Public Transport Operating Model (PTOM).

Concurrently to entering into the ferry services agreement, Fullers360 and AT also entered into a Quality Partnership Agreement detailing some arrangements to further support access to public transport and essential services in Auckland by Waiheke Island residents. It was expressly acknowledged and agreed to by AT that:

- (a) Fullers360 (and would be) the operator of the Waiheke Ferry service (i.e. the MTIA route);
- (b) this service is an exempt route and resultantly, not captured by RPTP processes, policies or controls, regardless of being defined as integral alongside other exempt services; and
- (c) the fully executed Quality Partnership Agreement would be in place for a term of 12 years.

The Waiheke Ferry service is an exempt service under PTOM and is currently subject to a review by Waka Kotahi, NZTA. It is understood that AT have not provided a viable solution to address concerns raised by some Waiheke Island residents (ie: ferry fares, congestion and reliability) should the exemption ultimately be removed. The exemption review has not yet been completed by Waka Kotahi, NZTA.

In addition to the failure to act in good faith, we believe that it is misleading to Aucklanders for AT to consult on a proposal to take over the MTIA route when the service is exempt and not under AT's control or operation. Furthermore, AT have contractually committed to a 12-year term with Fullers360 under the Quality Partnership Agreement - an agreement initiated by AT. As an existing commercial partner of AT, we are disappointed by AT's positioning and quite frankly, it is damaging to our brand, potential investors and business operations to publish an RPTP that includes a proposal to take over the Waiheke Ferry service.

Discussion of Key Points in response to AT's proposal to take over the Waiheke Ferry service

We discuss each key point introduced at the beginning of this letter below.

A. Motivation for economic gain versus good public transport outcomes.

It is apparent that AT's motivation for financial gain as opposed to clearly and strategically working towards good public transport outcomes appears to have resulted in a poor utilisation of resources and insufficiently used infrastructure which is disappointing.

We have real concerns about AT's plan to deliver the ferry services comprising two units identified at page 75 of the RPTP:

... This consolidation process is being undertaken as some contracts expire, but also requires adjustments to the expiry dates of others to line them up with the contracts they will be combined with. The exact dates of the commencement of new units are therefore subject to negotiations with existing and future operators, as contracts are tendered and renegotiated. The dates of commencement of new units are therefore provided as a likely range in the table below.

802 Ferry Services Unit 1 Current

803 Ferry Services Unit 2 Commencing 2025-2028

Ferry Unit 1 (802) includes:

- (a) Devonport – Downtown.
- (b) Beach Haven – Hobsonville Point – Downtown.
- (c) Gulf Harbour – Downtown.

Ferry Unit 2 (803) includes:

- (a) Bayswater - Northcote Point - Downtown.
- (b) Bayswater – Downtown.
- (c) Pine Harbour – Downtown.
- (d) Rakino Island – Downtown.

We recently gave notice to AT to withdraw our services for Bayswater, Birkenhead, Northcote Point, Stanley Bay and the Inner Harbour Loop. This is on the account of insufficient crew to service those routes, noting that the industry continues to face crew shortages following the Covid-19 pandemic. While we were disappointed not to continue servicing those communities in partnership with AT, unfortunately, these particular services were no longer sustainable from a business operations perspective. It is important to note that there was no intention for Fullers360 to operate these services under a long-term agreement given they sit within Package B (Ferry Unit 2) and our long-term partnership with AT is only for Package A (Ferry Unit 1) services as it relates to existing ferry routes.

AT had advanced notice of this matter and the possibility that services may be terminated well before the notice was issued by Fullers360. The last date due to operate these routes for Fullers360 is 30 September 2023. We are unaware of AT's contingency plan regarding these services but in our view, there is a real possibility that these routes will ultimately be discontinued in the near future. We hope that this is not the case and can imagine the devastating impact to Aucklanders without having these services available or an alternative (reliable) public transport mode which AT are responsible for.

Furthermore, there is no demonstrable investment by AT in the existing network due to misguided strategy (ie: financial gain as opposed to what will benefit Aucklanders) and poor investment decision-making. We can point to the miscalculated investment at Te Onewa Northcote Point, where a \$3.3 million dollar upgrade of wharf infrastructure, instead of a redesign, was prioritised. Following this investment there has been no material uptick in passenger volumes as the service runs on-demand and attached to the Birkenhead ferry timetable.

The investment in infrastructure at the time was not matched with an investment in the ferry service. Following the shortsighted investment and, with the Te Onewa Northcote Point service now in line to be terminated, it clearly points to a lack of long-term planning as it relates to inner harbour ferry services. Our view is a major asset replacement is required if this service ultimately is to be continued.

Furthermore, the cessation of the Stanley Bay ferry service also points to misjudged planning from a transport system perspective. Whilst the ferry service is bolstered by the significantly more frequent Devonport ferry service, the two services sit neatly together to unlock the Devonport peninsula. A lack of investment in the infrastructure and the need for future proofed planning of the Stanley Bay ferry service has left the Stanley Bay ferry wharf underutilised, and consequently the longevity of this service discontinued. Notwithstanding the impacts of Covid-19 across public transport, outside of these impacts, a clear plan to get this service back on track has not been articulated within this plan and is disappointing given the Devonport peninsula has severe congestion issues.

Additionally, with consultation underway to discontinue the Gulf Harbour ferry service by 2028, we again point to the lack of investment into ferry services. Gulf Harbour is a coastal suburb of Auckland and ferry services provide a critical accessway to the Auckland CBD and contribute to critical roading decongestion and emissions reduction. There is a large Auckland population living in the Whangaparaoa peninsula - and where further investment into ferry services for the Whangaparaoa peninsula including the use of Gulf Harbour Marina are considered, AT can unlock this whole peninsula, progress on decongestion, decrease emissions for Auckland and ultimately help with economic productivity improvements. Merely focusing on the roading infrastructure and bus networks to these coastal communities discounts the most direct access this suburb has to the Auckland CBD – by water.

It is therefore concerning that AT propose to increase additional services on almost all of the above routes in 802 and 803 during peak periods without the necessary investment into infrastructure or appropriate future-focused contracts in place.

As AT is aware, Fullers360 has expressed strong expectations of what a modern fast ferry and an improved integrated ferry network looks like on the Hauraki Gulf within the next ten years. The RPTP should take an ambitious position on what good looks like as opposed to a budget constrained outlook.

B. Substantial Investment to upgrade access to Waiheke Island required.

Ferry services operate as part of a complex, integrated network, relying on both private and public infrastructure. The current wharf infrastructure for the MTIA route end-to-end requires substantial investment to upgrade it to the necessary level to support the intended high-performance public transport network that AT envisage in the RPTP.

Our peak visitor period to Waiheke Island is, of course, summer. The Matiatia wharf is an historical issue with high traffic, congestion, and access issues. These issues surface every summer which impacts our business operations end-to-end. As this has not been resolved by AT, we expect these issues to reoccur this upcoming summer which will undoubtedly worsen as visitor demand continues to grow.

AT are already accountable for Waiheke Island public transport infrastructure assets that support Waiheke Island Ferry services. The assets at the Matiatia wharf, terminal and keyhole, Kennedy Point and Orapiu, and Piers 11 and 12 at the Ferry Terminal Downtown, Auckland require substantial upgrades to improve ferry transport outcomes and enable competition on those four sites. The current infrastructure is an established barrier for competition and investment in the ferry industry and potential new ferry operator market entrants.

At page 48 of the RPTP it is recorded that AT intend to:

...

Maintain, upgrade and improve wayfinding around rapid transit stations, major interchanges, and ferry wharves

Additionally, page 49 further details AT's intended plans for upgrading wharf infrastructure to support the public transport network:

"AT is investigating improvements to rapid transit stations and ferry wharves, that will look to align with wider improvements to the transport network (such as connecting to new footpaths and cycleways). In making these improvements, AT will aim to:

1. Make station access more equitable and embed universal design
2. Make stations, and the routes to and from them, safer and more secure
3. Improve customer experience at and satisfaction with the station.
4. Increase the share of trips made by walking, cycling and public transport.
5. Increase patronage on the rapid transit network".

While we commend AT on its good intentions to investigate ways to improve infrastructure on ferry wharves in the RPTP as reproduced above, we observe this is heavily train mode focused rather than ferries. In fact, there is no wharf infrastructure upgrade or maintenance plan created by AT that is evident in the RPTP at all, save for the promise to upgrade ferry terminals (refer, page 40 of the RPTP).

If, for example, AT took over the MTIA route as owner/operator (which for the record, Fullers360 does not propose or consent to), and actioned their proposal in the RPTP to increase the capacity on passenger ferries, there would be an influx of people to Waiheke Island (and also other ferry-mode destinations), which results in increased congestion at each wharf and on-board vessels, and likely affect timetable reliability due to increased embarking and disembarking procedures. The infrastructure would simply not sustain this now, or in the future. The RPTP does not address this critical issue and its absence is misleading.

While Fullers360 wholly supports a necessary upgrade to landside/wharf infrastructure for the Waiheke Ferry service, as we understand it, there is a real possibility that such intentions may not be deliverable due to AT's clear budgetary and funding constraints. Insufficient investment into wharf infrastructure by local government is not a novel issue. By way of background, in an attempt to resolve congestion on the wharf and other issues, Fullers360 has sought improvements to AT assets to improve customer outcomes at Matiatia, Waiheke Island and Downtown Auckland given the assets are AT owned. No substantial improvements to the Waiheke infrastructure have been made in years.

Another relevant matter that has not been considered by AT in the RPTP is the alternatives to public transport to and from Waiheke Island to relieve congestion on current ferry transportation. We believe that this stems from a consequence of a lack of infrastructure, investment and long-term public transport network planning in Auckland to support a larger volume of public transportation that is on par with major cosmopolitan cities around the world.

While the RPTP provides that improved access and upgrades to ferry terminals and wharves will be investigated by AT, there does not appear to be an investment strategy into upgrading and maintaining ferry infrastructure or a plan that we can point to.

If we indulge AT for a brief moment and consider what Auckland could look like if AT were able to secure funding and extensive resources to operate the service in-house or contract the route to a third-party operator, AT would unnecessarily burden Aucklanders and place our government into further debt. This is not what 'good' would look like for our city.

In addition, this situation is also difficult to imagine because unfortunately for AT, it is not that simple. Fullers360 is privately funded whereas AT would need to rely on funding from government and Aucklanders. Unlike Fullers360, AT do not possess the ~40 years of institutional knowledge acquired in operating the Waiheke Ferry service, not to mention the requisite marine expertise in waterborne transportation and the strict regulatory environment that we operate under.

This is not an aspect of our business that can simply be handed over to AT (or a third-party operator) overnight or acquired. It requires years of careful planning, strategic leadership, innovation, dedication to the service and a comprehensive understanding of maritime law. Further, it also requires continued investment into the service which is not purely limited to financial investment.

C. No provision in AT's budget.

Considering known budgetary restraints in the context of the Waiheke Ferry service, we would firmly caution Aucklanders not to indulge AT's proposal to take over the MTIA route because while at face value AT appear to market this as improved access, a greater network and a reliable one - in reality, AT is looking to Aucklanders, Auckland City and the New Zealand Government to fully fund this unattainable and burdensome proposal. Put another way, we consider that the funding necessary to upgrade existing infrastructure end to end, maintain this infrastructure appropriately, upgrade and standardise ferry fleets, recruit and train crew and operate services would be in the region of more than \$1,000,000,000 across ten years.

D. Passenger Safety - the Amendment Bill and Sustainable Public Transport Framework.

AT's intention to implement the Sustainable Public Transport Framework (SPTF) framework if the Land Transport Management (Regulation of Public Transport) Amendment Bill (Amendment Bill) is passed, will be problematic in some respects for ferry operators. The Amendment Bill stems from a lack of consultation, analysis and assessment of the impact of the proposed changes on the provision of ferry services, given the fundamentally different business, environmental, regulatory and maritime safety context in which ferry services businesses operate. Safety is, and always has been our paramount concern. However, the RPTP markets increased capacities, larger volumes and a higher frequency of ferry services without proper regard for maritime safety regulations.

There are some aspects of the SPTF which may be implemented through amendments to the Amendment Bill (discussed below) - and through the development of operational policy, could have serious unintended consequences for ferry operators if the current Amendment Bill is passed and if AT resultantly implements the SPTF. We take this opportunity to forewarn AT in this regard of the impacts that the SPTF and Amendment Bill (in its current form) may have for the ferry operators and procuring regional transport authorities.

We put health and safety at the heart of everything we do and take a lead role in ensuring maritime safety on the Hauraki Gulf. We question the capability for a procuring regional transport authority to grasp the full extent of the dedication and diligence required in maritime safety versus meeting timetable - whereas passenger safety must always be the paramount consideration. Notably, the words "larger capacity", "more capacity", "extra-capacity", and "high capacity" are mentioned in the RPTP on several occasions with respect to buses and ferries. We recently voiced this concern in the context of presenting submissions to the Transport and Infrastructure Select Committee on the Amendment Bill.

The Amendment Bill and the analysis sitting behind it fail to properly recognise and reflect the simple but crucial point that ferry and bus passenger transport operations are not the same. We are concerned about the unintended consequences of proposed amendments that simply have not been designed and evaluated with marine ferry operations in mind. This is a clear and obvious health and safety issue.

Resultantly, AT's intention to transition to the SPTF from PTOM is concerning for ferry operators and ferry services. Page 63 of the RPTP provides:

AT will ensure that all PT services integral to the regional PT network described in this Plan (other than exempt services) will operate under a Public Transport Operating Model (PTOM) contract with

AT, to enforce the policies and actions in this Plan. AT will appropriately transition PTOM to the Sustainable Public Transport Framework (SPTF) as this replaces PTOM. AT will also consider investment and ownership options for PT fleet and infrastructure assets via modal procurement strategies.

AT will procure and monitor PT services in a manner that supports efficiency, cost-effectiveness, and provides value for money. AT will look to align its approach with the principles of the proposed Sustainable Public Transport Framework, if introduced.

AT will award a contract for each service unit, following either a competitive tender or direct negotiation depending on the process outlined in the region's modal procurement strategy. In this process, AT will ensure that ferry, bus and train contracts contain consistent principles, policies and relevant performance measures.

Fullers360 understands the need for changes to be made to PTOM in order for New Zealand to achieve its objectives for mode-shift, fair and equitable treatment of employees, and improved environmental and health outcomes from the provision of public transport. We are generally supportive of the changes being made in the planning, procurement, and delivery of public transport services, which addresses systemic issues affecting the bus sector (noting that Fullers360 operates a PTOM bus service). However, the PTOM bus service model is wholly unworkable for ferry (and is likely to be a major maritime safety issue) in relation to the provision of ferry services, particularly (but not only) where those services are currently exempt but may at some point have that exempt status removed. Fullers360 is uniquely capable of understanding the significant difference in bus and ferry modes in this context.

Without delving into the complex amendments and legalities of the Bill, in summary, the Amendment Bill and SPTF do not reflect the realities of the ferry service operating environment. As such, it creates the potential for a significant safety hazard, particularly where a regional council may seek to operate that service in-house (refer clause 116A of the Amendment Bill). In other words, this would enable regional councils and territorial authorities (including Auckland Council through AT) to deliver public transport services ('units') through in-house service delivery rather than requiring that the services be provided under contract to a third-party operator on an exclusive basis.

At a practical level this means that under the Amendment Bill, the worst-case scenario for Fullers360 now is that if the exempt service status were to be removed, having invested in the Waiheke Ferry service and in New Zealand for several decades, Fullers360 may simply be cut off; its longstanding Waiheke ferry service appropriated overnight. It will have no choice in whether that occurs in the event that Auckland Council (through AT) chooses to provide the service in-house. However, it would be a miscalculation for Auckland City Council to carry forward a plan to nationalise the Waiheke Ferry service, without compensation and its unintended consequences. That is an impossible basis on which to make even short-term investment decisions, let alone the kind of long-term investment and planning required for the provision of ferry services (which, as noted above, are by nature completely different from land based public transport services).

It is therefore untimely for AT to envisage transitioning to the SPTF without the unintended consequences for ferry operators and operations being completely resolved. In any event, we cannot see how the SPTF policy can be developed (or implemented by AT), when no meaningful consultation has taken place with industry operators at the outset.

Incorrect vessel standard for ferries application

It is positive that AT wish to achieve standardisation in respect of new ferry builds. However, we note at page 41 of the RPTP that an incorrect ferry standard for new ferries (which is unapplicable to operators) is intended to be implemented by AT:

Ensuring that all new ferries used on contracted services comply with the Ferry Standard for New Ferries used in Urban Passenger Service and any approved additional requirements or approved exemptions for the Ferry Standard that AT has put in place. This will also improve the ability of ferries to carry bicycles.

The existing 2011 vessel standards for ferries currently apply and as we understand it, AT have been unable to update this standard to align with the new electric vessel standards. Furthermore, it is inaccurate for AT to claim to have put these new vessel standards in place when this contains Fullers360's intellectual property - and also for electric vessels both Fullers360's and EV Maritime's intellectual property, to which AT currently have no license rights. We invite AT to directly engage with Fullers360 to explore this further.

What does good look like for Aucklanders?

Prior to entering into the Agreement for Auckland public transport ferry services with AT, Fullers360 were involved in extensive negotiations for over two and a half years before a commercially sound, value for money-based agreement was reached over a 12-year term. In our view, this Agreement is an example of what good could look like within the integrated public transport network that AT envisage in the RPTP.

Fullers360 have put together a map of our vision for the city over the next ten years (Appendix 1) with an end-to-end high performing, integrated public transport network. Please note that this map is the property of Fullers360 and cannot be distributed or published without Fullers360's prior written consent.

It would be helpful for us and Aucklanders if AT could clearly provide in the RPTP their vision and plan for ferry services and the supporting infrastructure development and investment for the next ten years.

Conclusion

AT's proposal to take over the Waiheke Ferry service is premature and misguided. For AT to provide the Waiheke Ferry Service under contract with a provider, it will need to cover a significant cost base for the service, subsidise fares, and find the funding to invest heavily in infrastructure and skilled marine staff to then meet the customer growth that follows. Unfortunately, none of these issues appear to have been adequately addressed in the RPTP.

The higher frequency of ferry services and increased passenger volumes/capacities that AT envisage attracts great cost. Substantial investment into landside and wharf infrastructure is required which not only burdens taxpayers and government to fund entirely, but indirectly shifts responsibility onto taxpayers to resolve a historical local government failure to strategically plan and invest in infrastructure to support a high performing public transport network on par with large cosmopolitan cities.

We are proud of our work as industry leaders, as safe and sustainable innovators, and in the level of service we provide. We do not take our position for granted and work hard to meet customer needs. We hope to remain the provider of the Waiheke Ferry service MTIA route - and continue to be a lifeline for Waiheke residents to mainland Auckland, connect visitors to Waiheke Island to experience Waiheke Island hospitality that we are proud to continue promoting, and also connect people to their essential services day to day.

As an aside, we are aware that the Waiheke Local Board (Board) is consulting with residents on AT's proposal to take over the Waiheke Ferry service and also the RPTP. Please note that the Board have been copied to this letter.

Should AT wish to discuss Fullers360's feedback, please contact me.

Kinetic - Moving People

Date 17/8/2023
The Chief Executive
Auckland Transport
Private Bag 92250
AUCKLAND 1142
rptp@AT.govt.nz

Dear Dean

Kinetic Feedback to Draft Regional Public Transport Plan 2023-2031

Below please find Kinetic's feedback to Auckland Transport's Draft Regional Public Transport Plan 2023-2031.

Executive Summary

Kinetic supports the broad goals of the plan to improve services, continuing with the development of major infrastructure projects, investment in supporting infrastructure and improving the customer experience. We have made comments on specific parts of the plan where we see omissions, need more detail and a few questions we think need clarification.

We note with most concern however the proposed shift by AT towards more control of bus company owned assets and the risk this poses to the efficiencies currently enjoyed by the region's transport system.

AT benefits significantly through the local, national and international experience and expertise that its contracted bus companies bring to the city. A bus depot does not live in a vacuum independent of the operations around it. Nor are they permanently in the best position as the city grows and transport networks evolve. Through commercial eyes, bus operators are continuously evaluating where the best bus depot locations are, how they should be utilised and how they interact with the company's other depots. Decisions are based on commercial outcomes, through which the competitive tendering system ultimately benefits.

If encouraging a competitive bus contracting market is a priority (and we think it should be), we can evidence there are few barriers to entry in Auckland with the Go Bus contract wins in South, East and North Auckland between 2016 and 2018. To stymie the market by taking away one of a bus company's tools for competitive advantage, the siting and design of their depots, will have negative long term consequential outcomes for the overall cost efficiency of bus services in the region.

Part 1

Section 1.1.3 Since the last RPTP

Safety

There is a statement that AT is keenly aware of safety concerns raised by drivers and public transport users. To make PT attractive to drivers and customers, AT states they need to plan and design stops, stations and services to deter anti-social behaviour including improving frequencies to reduce the time people need to wait at night when it may be dark.

Increasing the frequency of evening services will not make PT attractive for drivers however. It will create more duties that require drivers to work late into the evening or the early morning of the following day. These are duties that Operators struggle to recruit drivers for due to the unsociable hours and the potential increased risk of driving alone at night. We would recommend that AT considers the working conditions it is creating for drivers by way of its timetable design and hours of operation.

Bullet point three on Asset Ownership.

AT states that amendments to asset ownership will provide more options and additional flexibility and could be of particular importance to ensure that things like availability of land for facilities, like bus depots.

We believe that taking away control of depot locations from bus operators poses the risk of flow-on effects including inefficient network operations. Public Authority chosen depot sites will unlikely provide any consideration of integration with other bus company operations and the benefits this brings, and the expertise and experience of bus operators in depot layout and facilities will be lost. Further, it is implied in the document that bus company purchase of vehicles could also create cost benefits for authorities. The purchasing power of a single authority will not be as great as the strength of a larger national or international bus contractor providing services to the city. For example, Kinetic's NZ businesses travel significantly more kilometers and own and operate more

buses than the entire AT Metro network. Further, in overseas jurisdictions where operators are expected to operate vehicles that are owned and/or selected by Transit Authorities, there is evidence of higher tender prices, poorer fleet quality and a reduction in innovation, with higher margins for vehicle suppliers.

We believe that the risks associated with the selection, management and maintenance of vehicles and depots best sits with the bus operators who have significant expertise and experience in this aspect of service delivery and can bring that experience and scale advantage to the table.

Part 2

2.1 Improvements

We observe that road surfaces play a huge part in making the bus journey comfortable (or not) and damaged bus lanes are often very uncomfortable to travel in (Symonds Street for example). The plan should pay particular attention to the provision of quality road surfaces for quality bus operations.

The Customer experience improvements notes improvements to the AT Journey Planner App. Provision of quality information available for other journey planner apps such as Google and Apple Maps should also be provided for, to capture all digital journey planning channels. Of note is the inter modal travel provided for though these apps.

2.2 Short-term focus

Working with our bus operators to fix the driver shortages:

We note that although the driver recruitment issue experienced over 2022-23 has been solved, it is from a purely numbers point of view. The fact that there are requirements for drivers to hold a class 4 licence to operate certain larger vehicle types, which takes longer to attain, will mean a lag on correct vehicle type usage on some routes.

We see in the plan that improving driver facilities and the number of layover spaces for buses is not a short-term focus but a medium - long term one. We disagree and believe this should be an immediate focus if we are to improve driver conditions. By way of example, many rest breaks are having to be taken in "live" bus stops due to the lack of suitable facilities.

Getting through the rail network rebuild

Mention is made that the frequency of existing bus routes is being improved so customers can still move around the city whilst the rail network is rebuilt. There is however no mention as to whether these frequency improvements will be permanent. It would be good to see further commentary included outlining what will happen to the frequency of the bus routes.

2.3 Medium Term Focus

AirportLink Extension

The Airport Link Extension to Botany will require bus priority infrastructure between Manukau Bus station and Te Irirangi Drive. In addition, further bus priority infrastructure will be required at Auckland Airport to safeguard bus punctuality and reliability. This will be increasingly important as the route lengthens, and the airport becomes busier.

Part 3

3.3 Goal 2

Enhancing the environment and tackling the climate emergency

It is good to see that AT's goal that all buses will be low emission by 2035 aligns with the Government's mandate. However, this goal is in the statement "What we plan to achieve by 2031". For clarity this should be removed?

It is important to note that there will still be a large number of diesel vehicles that still have life left in them in 2035, not to mention 2031. It would be good to have a commentary included on how this issue will be addressed.

3.4 Goal 3

Safe and accessible transport for everyone

If AT is planning to add services and increase patronage, we are not sure that there will be a reduced number of reported safety incidents (cases). A better goal will be to aim for a reduced number of safety incidents per 100,000 boardings.

3.6 Goal 5

Bullet point 2.

What are the patronage targets that routes must meet and what efficiencies? Can the plan be more specific? For example the school route plan is quite specific about patronage minimums.

PART 4 ACTIONS

Network design principles

We suggest adjusting the 2nd bullet point on page 34 to include the need for high quality infrastructure to support connectivity and transfers. .

4.3 Goal 2

Actions

What about the existing fleet that is not end of life? No mention is made of what will happen with these vehicles. See previous comment on including additional commentary on the matter.

Part 5

5.2 Goal 1

16.1

It would be good to include further information on what constitutes a significant proportion of customers under 16.1.

Part 7

7.5 Services List

Bus Services

Note Routes 781, 782 and 783 are missing off the table.

The plan notes Route 775 is to be deleted, but this will leave only an infrequent connector route through the Glendowie loop, and less capacity along Tamaki Drive, which is often oversubscribed by passenger demand.

Other comments

Safety/fatigue

Where do the driver fatigue and driver screens specified in AT's recent Northwest bus tender come into the RPTP? If these are priority safety issues, then you would expect them to be signaled in the RPTP.

Recharging window

AT needs to consider the impact of increasing service levels in the evening on the availability and length of the overnight recharging window for battery electric buses.

Summary

Kinetic is a proud supplier of bus services to Auckland Transport. We fully support Auckland Transport's growth ambitions, and we know the important part we will play in achieving these goals. To do this efficiently and effectively however, we need to be able to apply all our local, national and international experience and expertise with full access to all the tools we currently have at our disposal.

Any restrictions on our ability to move with the market and be flexible and adept, by tying us to publicly procured depots or vehicles, will ultimately reduce the financial and operating benefits the region currently enjoys - from the competitively priced bus operator procurement and operating model it has today.

We do not propose that we need to speak to this submission at the open hearings.

Sealink Travel Group Ltd

Specific routes

Sealink Ltd operates the Kennedy Point to Half Moon Bay vehicle ferry which is an integrated service and also the Kennedy Point to Wynyard Quarter vehicle ferry service which is non integrated. Sealink have operated services to Waiheke for some 60 years and both of the services are fully commercial and carry a mix of freight vehicles, cars, special service vehicles as well as walk on passengers. We provide a competitive option to the Fullers Matiatia to Downtown ferry service and if this Fullers service was to become part of the public transport service under the PTOM model and therefore subsidised Sealink would be severely compromised with the resultant unfair competition that would arise. We believe the PTOM model should not be able to be used to create unfair competition and we therefore ask that Auckland Transport think seriously about the probable unintended consequences of bringing the Matiatia service under the PTOM model.

Via Transportation

17 August 2023

Auckland Transportation

Auckland, New Zealand

We are pleased to present Via Transportation's (Via) comments and recommendations regarding the Auckland's Draft Regional Public Transport Plan 2023-2031

Background

Via is the world's leading provider of transit technology for public transport systems. Via partners with more than 600 of cities and transit agencies in 40 countries to assess, plan, and deliver transport services that expand mobility access in a flexible and adaptive manner. Our transit technology is used in a variety of ways: from providing transit planning through our Remix software to deploying on-demand public transport, and improving Total Mobility and non-emergency medical transport. Using Via's technology, public agencies and cities are expanding access to employment, education, and healthcare facilities, while also improving the efficiency of public transport.

Via has held a long and valued partnership with Auckland Transport (AT). AT has been using Remix as a key transport planning tool since 2016, and used Via technology to launch Auckland's first On Demand service in Devonport in 2018, pioneering the way On Demand could be used to improve public transport and generate mode shift. AT engaged Via to design the Papakura On Demand service and consider other additional locations for On Demand services.

As a global leader in providing technology powered public mobility services, Via believes that on-demand services can play a vital role in building equitable, accessible, and sustainable public transport for the future. In New Zealand, Via operates services in partnership with regional councils in Hastings, Timaru, Hamilton, and Tawa. In addition, our Remix planning software is used by AT, Bay of Plenty Regional Council, Environment Canterbury, Northland Regional Council, Wellington Regional Council and Otago Regional Council.

On Demand in the Context of Auckland's Transport Goals

To anchor our feedback regarding the incorporation of on-demand public transport (ODPT) services in the Plan, we begin by offering the following overview of how well-deployed ODPT services can further the goals enumerated within the Plan.

- **Goal 1: Services providing an excellent customer experience**

Software-enabled ODPT services provide superior customer experience to many fixed route and Total Mobility services. Although ODPT cannot replace dense, high-capacity fixed route services, in medium to lower-demand situations ODPT services provide the convenience of on-demand ride requests, enhanced flexibility, reduced walking times, real-time ride tracking, and mobile ticketing, with comparable or improved wait times compared to fixed routes. In Timaru, the Via-operated MyWay service replaced previously underutilised fixed routes, increasing customer satisfaction and demand while improving service.

Similarly, ODPT services offer greatly improved experience for many Total Mobility customers. Existing Total Mobility services are often provided by phone dispatch taxi services disconnected from the wider public transport network.

Software-enabled ODPT offers a variety of customer experience improvements (enumerated above) over phone dispatch taxis, at a lower cost for both PTAs and customers.

In summary, the deployment of well designed ODPT services in appropriate use cases greatly improves customer outcomes for a variety of users including Total Mobility customers.

- **Goal 2: Enhancing the environment and tackling the climate emergency**

Improvements in the environmental sustainability of PT services themselves, while essential, are only one part of the broader role of public transport in solving the climate emergency. To reach climate goals, policymakers must shift as many customers as possible from resource-intensive private vehicles to shared modes.

As the Plan states, this will require a “high-quality PT system that is competitive with, or more attractive than, using the car”.

To encourage customers to fully transition away from private vehicles to shared modes, public transport services must provide high quality service across the entire service region, at all times of day. ODPT services are necessary to achieve this goal as they can cost-effectively serve areas and times where fixed routes are not viable or deliver poor customer experience as well as provide first and last mile connections to feed fixed route services. There is compelling evidence that On Demand service generates mode-shift that is not achieved through solely route based adjustments.

- Goal 3: Safe and accessible transport for everyone

On Demand services are key to provide affordable, high-quality mobility across Auckland in three ways: providing service in areas where fixed routes have poor quality of service (particularly in deprived areas), improving customer experience and cost for Total Mobility customers, and improving safety outcomes for customers.

First, On Demand services can operate in areas where fixed routes are unsustainable, including rural and remote areas, suburbs, and lower-density urban neighbourhoods. Many of these areas are disproportionately likely to be socio-economically deprived. The introduction of On Demand service in these areas can provide affordable, reliable mobility to residents at a cost far lower than owning a car, with a superior customer experience to fixed routes in many instances.

Second, On Demand can serve trips for many Total Mobility customers at a low cost while providing superior customer experience, as discussed above. The following diagram illustrates this relationship between Total Mobility and On Demand services:

The provision of well-designed on-demand services, where appropriate, will help improve the accessibility of Auckland’s overall transit network.

Finally, On Demand services can help improve safety, particularly in first and last mile use cases. The United States Federal Transit Administration (FTA), in a 2022 evaluation of on-demand services operated by Via in Los Angeles and Seattle, found that customers reported increased perceptions of safety: 63% of respondents using the Los Angeles service and 67% of customers using the Seattle service reported feeling safer than when using available alternatives.¹ In general, the fact that on-demand rides are booked using a personally identifiable rider app creates a strong disincentive for anti-social behaviour and promotes safety in such services. Waikato Regional Council uses On Demand to support night time public transport services from 6pm - 4am on Friday and Saturdays which has proved extremely popular due to its dependability and safety for passengers.

1 Available online at

<https://www.transit.dot.gov/research-innovation/mobility-demand-sandbox-demonstration-los-angeles-county-and-puget-sound-first>

- Goal 4: Integrating public transport into a growing Auckland Transport

On Demand can assist in growing public transport by providing first and last mile connecting services in new and developing areas. Increased density around public transport stations and other land-use changes will also require more robust first last mile connections and connectivity to suburban areas at the edge of cities, as acknowledged by Auckland Transport. As discussed above, On Demand services are particularly suited to this use case. Moreover, the relatively low startup time and capital cost involved launching an On Demand service (an On Demand service can be launched in a matter of months) means that such services can be rapidly deployed to support new developments or changes in the urban environment. On Demand service parameters can also be adjusted easily to respond to construction-related changes in traffic conditions or travel demand, making these services ideal for growing urban environments.

On Demand in the Plan

Given that ODPT services play a vital role in achieving the goals of the Plan, we offer the following comments on the drawing on Via's significant experience across New Zealand:

- On Demand use cases are misidentified as "very low" patronage as compared to other service layers

On Page 74, Auckland Transport compares various "service layers" in its system. On Demand is identified as a "very low" patronage, compared to Local and Rural services which are identified as "low" patronage.

Although legacy On Demand services relying on manual or phone dispatch systems are often unable to manage higher demand, this is not true of contemporary, technology-powered systems. In The Ponds, New South Wales, Via technology powers an On Demand service which achieves an average utilisation rate of 10 passengers per hour. Similarly, the MyWay by Metro On Demand service in Timaru has an average utilisation of 7 but during AM and PM peaks often achieves utilisation between 10-14. The Via powered Moree service in regional NSW has average utilisation over 7.

Furthermore, Auckland Transport has specified minimum frequencies for Local services as 60 minutes overall and for Rural as 60 minutes at peak and 120 minutes otherwise. These frequencies are quite low compared to On Demand services (specified as roughly 15 minutes in the Plan), and it is not reasonable to suggest that such services would experience patronage levels higher than more frequent On Demand services.

- Selection of potential On Demand service areas is vague and overly narrow

On page 35, Auckland Transport has identified a set of possible On Demand service zones without providing a rationale for this selection. In addition, the selection of On Demand transport services seems to restrict future On Demand deployments to supplementary services in areas where fixed routes do not provide coverage, aside from the Pukekohe On-Demand service.

As the Plan itself states, On Demand can also replace low-performing fixed routes at the same or lower cost, while providing superior customer experience. In particular, services classified as Local, Rural, or Connector have low minimum frequencies and serve use cases which may be better served by On Demand. AT should more fully investigate which fixed routes can be replaced by On Demand services.

- Auckland Transport should more thoroughly explore On Demand services for Total Mobility customers

As explained above, ODPT services can improve customer experience for Total Mobility customers while reducing cost compared to traditional taxi subsidies. However, On Demand is only briefly mentioned under actions for Goal 3 relating to Total Mobility customers. Auckland Transport should more seriously consider how expansion of On Demand services and integration of On Demand into Total Mobility can improve customer experience and lower costs.

- Auckland Transport should explore technology improvements as part of its On Demand strategy, especially as relates to electric vehicles

Contemporary On Demand services are reliant on technology to provide a quality customer experience and efficient operations, and technology providers can vary widely in the quality of service they are able to provide. As Auckland Transport looks to increase use of On Demand and additionally electrify On Demand services (which poses operational challenges analogous to but distinct from use of electric vehicles in fixed route service), Auckland Transport should explore more fully the importance of technology providers and standards in On-Demand services. For example, Auckland Transport should consider updating its technology strategy, as ODPT service technology has advanced significantly in the three years since the last panel, with gaps between technology providers widening as industry leaders continue to innovate.

Thank you for the opportunity to comment on the Draft Regional Public Transport Plan.

Sincerely,

Benjamin Hague, Regional Manager APAC

Arjun Janakiram, Associate Principal, Public Policy

Yachting New Zealand

Specific routes: Gulf Harbour

Yachting New Zealand oppose the proposal to terminate the Gulf Harbour Ferry service.

(a) Yachting New Zealand oppose the proposal to terminate the Gulf Harbour ferry service in 2028.

It would reduce public transport options in this network, increases congestion on the eastern half of the peninsula and will result in greater private vehicle use and carbon emissions. It fails to recognise the specific needs of this community and the constraints of this section of the Whangaparaoa Peninsula. The service has played an important role in providing the fastest and most convenient public transport option to commuters travelling south to the city. As such it runs entirely contrary to the notion of an integrated public transport network on the Whangaparaoa Peninsula and has the potential to produce severe adverse effects on that network as a whole.

(b) This proposal will negatively impact people's travel choices and their lives. Many have invested in the area as a result of a guaranteed ferry service.

(c) The potential to grow events, develop commercial marine infrastructure and education on the peninsula will be severely impacted without a regular and reliable ferry service.

The ferry service has been marketed by developers for the last 20 years as a strategic selling point.

(d) Many transport services, in fact most in the greater Auckland area are subsidised by rate payers and gulf Harbour should not be excluded from a subsidy. Whangaparaoa rate payers should not be expected to subsidise services they won't necessarily have access to.

(e) The GH ferry service is a distinct travel option that has successfully served this part of the Whangaparaoa Peninsula for the last 25 years. Suggested improvements to the local bus service in 2028 will not compensate for an efficient ferry service.

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The ferry service is the fastest, most convenient and comfortable public transport option for commuters travelling to the city. This applies to anyone living east of Little Manly travelling to the city. As such it is extremely unlikely ferry commuters will simply transfer to buses, indeed it is far more likely former ferry commuters will in fact return to their cars thereby exacerbating the already constrained roading network.

The journey times and choice of sample journey advanced by AT are misleading.

By AT's own Hop data, the majority of ferry patrons come from the general Gulf Harbour catchment, not Manly shops (as used in the sample representative journey put up by AT - the average travel time attributed to the ferry is exaggerated as a result).

The rationale of 'duplication' advanced for terminating the Gulf Harbour ferry runs entirely contrary to what is being proposed for nearly all other ferry services in the RPTP where they are being extended despite the simultaneous investment of major new bus infrastructure in the same location. (e.g. at West Harbour and Hobsonville the proposal is for additional peak, mid-day and evening ferry trips despite the fact an improved busway and express service from Westgate along the Northwestern Motorway is currently being constructed.

Similarly at Half Moon Bay the proposal is to add additional peak and weekend trips despite the massive investment in the nearby Eastern Busway).

Right up until this RPTP proposal went out, Auckland Transport had previously consistently signaled to the community that the Gulf Harbour ferry service would also receive a similar extension in services over time. As such this proposal represents a breach of faith with the community.

(f) This proposal will add to the already constrained 10 kilometers of roading network from Gulf Harbour/Army Bay through to the Penlink intersection affecting both private vehicles and buses.

There is approximately 10 kilometers of roading east of the Penlink connection which remains entirely unaffected by the Penlink project. It is also the part of the peninsula served by the Gulf Harbour ferry service and will become increasingly congested by private vehicles and buses alike as further development on the peninsula continues.

We understand there are no plans to widen or add lanes and previous studies through the legacy council have shown this to be prohibitively expensive. Removal of the ferry service will inevitably put more private vehicles back on the road for this 10-kilometer section exacerbating the congestion that already exists for both buses and cars.

If the ferry service is removed \$835 million will be required to improve roading and reduce travel times getting off the peninsula once at Stanmore Bay, but simultaneously increasing the travel time and congestion actually getting to that turn-off.

There is clearly a lack of understanding of the dynamics affecting the 15 kilometer long Whangaparaoa Peninsula.

The assumption that Penlink will improve travel times along the peninsula is incorrect.

Whangaparaoa will always require a delicate balancing act in terms of traffic flows given its inherent geographic constraints and the ferry service will remain the best travel option for travel to and from the city for the eastern half of the peninsula community.

(g) The proposal runs contrary to repeated assurances given by Auckland Transport that the ferry service would be increased and improved in the future. It also runs contrary to the emerging integrated transport network on the HBC.

This proposal runs entirely contrary to the repeated assurances given by AT over the last 6 years that the GH ferry service will be incrementally improved with additional sailings and improved vessels 'assurances that have been backed up with continued investment in the GH ferry service' namely, implementation of additional sailings, the multi-million dollar purchase of the leasehold interest in the Hammerhead for the ferry terminal and associated parking (at the behest of AT) and the multi-million dollar payment for long term leases on the 3 ferry berths at the marina along with additional investment in ferry infrastructure at both Gulf Harbour and in the city.

A lack of prior consultation with regards to this decision has created considerable angst and had a serious effect on the health and wellbeing of this affected community especially when prior correspondence acknowledged the 'Gulf Harbour ferry service as being a valuable and important part of Auckland's wider ferry network'

(h) Auckland Transport's assertion, as part of their rationale for eliminating the service, that ferry unreliability is mainly attributable to unfavorable weather conditions is incorrect.

Ferry cancellations were simply not a significant issue when the previous operator 360 Discovery ran the Gulf Harbour ferry service up to 2019. Cancellations in the period referred to in this proposal (41.3% figure quoted) were largely the result of well-publicised region wide crew shortages, vessel breakdowns and other operator-related issues such as getting enough qualified engineers into New Zealand.

To suggest otherwise is misleading. A meeting earlier this year at the Gulf Harbour Yacht Club with the CEO of Fullers and councilors Walker and Watson, acknowledged and took responsibility for these issues.

Auckland Transport's own travel data below, shows average annual cancellation rates averaged only 6.8% in the four years 2018-2021 yet a phenomenal 43.13% in the last 18 months.

Average cancellation rates 2018 - 5.25%, 2019 - 5.79%, 2020 -7.42%, 2021 - 8.91%, 2022 - 38.35%, 2023 - 47.91%

As far as cancellations go, the main issue lies with the operator's performance not the weather (and indeed AT's ongoing failure to ensure that a satisfactory standard of service is consistently being provided as was the case pre-2021).

Many of the excuses being used are the result of inadequate investment in people, equipment and boats.

(i) The Gulf Harbour ferry service contributes significantly to the reduction in carbon emissions on the Whangaparaoa Peninsula.

Prior to recent reliability issues the ferry service averaged 16,000 to 18,000 boardings a month pre-covid with the previous operator (and that was for a 5 day a week timetable). With a 37.1% cancellation rate in March 2023, it still had over 10,000 boardings.

(j) There is an opportunity to create a unique world class marine hub and event space at Gulf Harbour on and around the Hammerhead and Gulf Harbour Marina creating significant economic benefit to the area and contributing financially to the region whilst enhancing a long term vision of Gulf Harbour being recognised as a world class marine precinct. A fast, regular and efficient ferry service will be critical to achieving this goal. Please do not let this legacy opportunity go.

Locals have lost faith in the reliability of the service and are using alternative transport but will return once the service improves.

The proposal to terminate the Gulf Harbour ferry service should be rejected and instead the focus in this RPTP should be on increasing the weekly services at Gulf Harbour (including trialing a weekend service). This would be consistent with other ferry service across the region and with what has previously been planned for the Gulf Harbour service.

Schools, community groups, and businesses

Beachlands South Limited Partnership

17 August 2023
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Submission on Draft Regional Public Transport Plan 2023-2031 (RPTP) on behalf of Beachlands South Limited Partnership

1. Introduction

(a) This submission is on behalf of Beachlands South Limited Partnership (BSLP), a limited partnership between MIB Limited Partnership (a Russell Property Group Entity), NZSF Beachlands Ltd (a New Zealand Superannuation Fund entity) and Ngai Tai Hapai Development Limited Partnership.

(b) BSLP is the requestor of proposed Private Plan Change 88: Beachlands South to the Auckland Unitary Plan (PC88). PC88 proposes to rezone approximately 307 hectares of Rural – Countryside Living zoned land adjoining the existing coastal town of Beachlands to a variety of urban zones. Approximately 159ha is proposed to be live zoned a mixture of residential, business and open space zones; and approximately 148ha is proposed to be zoned Future Urban. The potential residential yield in the lived zoned area is up to 2,900 dwellings, with an anticipated occupation of up to 10,000 people by 2038.

(c) Environmental sustainability is a cornerstone of PC88 and the transition from private vehicles to public transport, and fossil fuel to electric powered vehicles is a major part of this. PC88 has been planned around the existing Pine Harbour marina and the public ferry service between Pine Harbour and Downtown Auckland. The development has been designed with more intensive housing within walking distance to the ferry. Walking and cycling paths throughout the development will enable residents to access the ferry and other public transport services easily.

(d) In addition, PC88 anticipates an increase in bus service frequency and the potential provision of new routes between Beachlands and Botany due to the enhanced economic viability of this route resulting from effectively doubling the population of the community. From Botany, further high-quality connections to wider Auckland destinations are likely to be accessible via the proposed Eastern Busway (Botany to Panmure) and Botany to Airport rapid transit routes, which will further support the future Beachlands population.

(e) BSLP is delighted that AT's vision expressed in the RPTP is aligned with PC88. PC88 has been designed to integrate into and improve the existing ferry service. Through intensified housing around the wharf and significant improvements to active mode accessibility of the existing Beachlands town to the wharf, PC88 will assist AT to reach its goal of "massively increasing the uptake of public transport." BSLP looks forward to continuing to work with AT to deliver a reliable public transport solution for the current and future Beachlands population.

2. Submissions

(a) BSLP supports the draft RPTP's "long term aspiration" for public transport use to "increase significantly".¹ This aspiration is entirely aligned with PC88. BSLP agrees with the RPTP that greater public transport uptake will be achieved by improving the reliability, speed and frequency of services, improving the transparency and consistency in pricing, and progressing non-cash payment technology.² BSLP supports AT's plan to deliver these improvements in partnership with developers.

(b) BSLP makes the following submissions on the RPTP:

Ferry and Bus Services

(i) BSLP supports AT's goal to increase the number of people living within close proximity to public transport services³, but seeks that this goal be extended to include public ferry services where they are demonstrated to be frequent (at least half hourly at peak commuting times). There is no reason

why land around a ferry service should not be intensified, when doing so would contribute to the goal of increasing public transport uptake;

(ii) BSLP supports AT's plan to address the ferry crew shortage by the end of 2024;⁴ demand for ferry crew is likely to continue to grow as ferry services play a greater role in the Auckland transport network;

(iii) BSLP supports the plan to increase ferry trips for the Pine Harbour Ferry service, including additional peak (from 2024), midday (from 2026) and weekend trips (from 2026);⁵

(iv) BSLP supports AT's intent to move towards electric ferries,⁶ so long as vehicle standards for new ferries do not prevent the delivery of improved ferry services in the short or medium terms. For example, BSLP understands that technology is not yet available for electric ferries to complete the Pine Harbour to Downtown Auckland trip. This trip needs to continue in the period until this technology is available and affordable, and vehicle standards should not result in this service being removed (which would have a negative rebound effect and result in more residents using private vehicles);

(v) BSLP supports AT's priority to address the bus driver shortage to improve the reliability of bus services across Auckland;⁷

(vi) BSLP supports the provision of new Connector route 738 (from 2025) linking Maraetai to Pine Harbour as this will address the significant barrier to using the ferry service that existing Maraetai and Beachlands residents currently face. BSLP also supports the changes to route 739 to divert via Ninth View Avenue (adjacent to the ferry wharf), along with making the Beachlands loop two-way.⁸ These will both address the significant barrier to using the ferry service that existing Maraetai and Beachlands residents currently experience. It will also create a solid basis for eventually extending route 739 through the PC88-enabled development once population increases make that viable;

(vii) BSLP supports the move towards electric buses, including the goal to reduce emissions from buses by 64% by 2031, compared to a 2021 baseline;⁹

(viii) BSLP supports on-demand transport trials.¹⁰ A variety of public transport options will improve the accessibility and ease of using the public transport network. On-demand services could be particularly useful in rural areas and trials should continue to be expanded;

(ix) BSLP supports AT's goal to improve walking and cycling links to public transport services.¹¹ This has been integrated into the planning of PC88, which provides for separated active mode facilities along the length of Jack Lachlan Drive to enable all existing Beachlands residents to access the wharf in a safe manner, thus removing a significant barrier to ferry use;

Supporting new Residential Developments

(x) BSLP supports the statement in the RPTP that AT will support greater density and diversity of land use around rapid transit stations and "advocate for development that increases density and diversity of land use that is highly accessible to public transport".¹² BSLP requests that this goal be extended to also include frequent public ferry services. There is no reason that some public transport services should be favoured over others: where intensification around a frequent ferry service will contribute to an increase in public transport uptake then AT should support this;

(xi) BSLP supports the move to increase public transport services in developing areas and rural towns with at least 2,000 residents.¹³ BSLP was concerned to read, however, that AT intends to deliver a public transport service to the rural community "every two hours"¹⁴. This is far too infrequent to classify as a reliable and functional service during peak periods (but may be appropriate at other times of the day). The growth and patterns of demand for rural areas should be monitored, and more frequent services offered when required. BSLP seeks that AT work alongside rural communities to determine and continually monitor the requirements of individual communities and consider how a more frequent service that meets demand could be delivered;

(xii) BSLP supports the statement in the RPTP that AT intends to work with developers for the provision of new public transport services in areas with new housing developments, "when they qualify."¹⁵ While it is unclear from the RPTP what developments may "qualify" to work with AT, BSLP supports the intent that AT will work alongside the development community to deliver public transport routes alongside housing developments;

(xiii) BSLP supports the intent to develop and make publicly available thresholds for when public transport services will be provided to rural towns and new greenfield developments.¹⁶ This transparency will be hugely beneficial to developers and the Council when determining the potential impacts of a new development and forecasting traffic;

Funding



(xiv) BSLP supports the investigation of new and alternative sources of funding, including the indication that private partnerships will form part of the solution to delivering service improvements. 17 BSLP is open to discussing all funding options with AT and welcomes its willingness to work with developers.

Business North Harbour Incorporated

Submission: Auckland's Regional Public Transport Plan 2023 - 2031

15th August 2023

Business North Harbour Incorporated

Kevin O'Leary – General Manager PO Box 303 126 North Harbour 0751 Phone 09 968 2222 or 0274 799 563

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Local Board Representation: Upper Harbour Local Board

Introduction

Business North Harbour (BNH) representing the North Harbour Business Improvement District welcomes the opportunity to make this submission on Auckland Transport's (AT) Regional Public Transport Plan (RPTP) 2023 - 2031.

BNH is a significant commercial and industrial Business Improvement District (BID), representing over 4,500 commercial property owners and businesses within the North Harbour area. Collectively they employ over 37,000 Auckland residents and ratepayers. The organisation is located within the Upper Harbour Local Board area, which remains one of the fastest growing areas in the country, in both absolute and percentage population terms, which brings both challenges and opportunities to the North Harbour business district.

BNH represents and works with a wide range of businesses comprising of a mix of sole traders, Small Medium Enterprises (SME), through to multi-national organisations, representing sectors such as ICT, business services, specialist manufacturing, light – medium warehousing, logistics, retail and hospitality. In addition, we have key educational institutions within or on our boundary, including Massey University Albany and AUT Millennium, along with a variety of primary and secondary schools including Rangitoto College, the largest secondary school in New Zealand.

Background

The Auckland Regional Public Transport Plan (RPTP) is the key document that sets out the future of public transport planning and investment in the Auckland region. It guides the design and delivery of public transport services, information, and infrastructure in Tāmaki Makaurau over the next eight years, split into short-, medium-, and long-term timeframes. The plan describes the public transport network that AT proposes for the region, identifies the services that are integral to the network, outlines the contractual units these services will sit in, and sets out the objectives and policies that apply to those services. AT is seeking feedback on its Regional Public Transport Plan 2023 – 2031, stating: The draft RPTP outlines AT's proposals for Auckland's public transport system over the next 8-years. We want to hear your thoughts on the plan.

Our response, which is delivered from a business community perspective, is provided in summary and then answers AT's specific feedback questions which is: 1. What are your general comments on the RPTP?

BNH Feedback Summary:

One of BNH's objectives is to provide the most efficient, effective and amenable locations for business and investment within Auckland, making it the location of choice for business and property owners. If this is to be achieved, ease of movement and access to, in, around and out of the area is critical.

Based on the latest research from infometrics.com, it is evident that the productivity (GDP) of the North Harbour BID is already compromised, with congestion impacting on business functionality. The Upper Harbour Local Board area productivity (GDP) has under-performed the rest of Auckland in three of the last four years (2019 – 2022), despite the number of business units in the region increasing considerably more than the rest of Auckland in percentage terms over the same period. All of this equates to a significant economic cost, not only for our area, but on a regional and national level.

Additionally, the North Shore's population is projected to increase by 221,000 (2018-2043, according to Statistics NZ), or around 40 percent of the 520,800 more people the recent draft Auckland's Future Development Strategy claims are expected to live in Auckland over the next 30 years. Based upon the above information, the transport and infrastructure priorities for BNH members are those contained in the RPTP which will enable:

- o Easy access into and around the North Harbour Business Improvement District (BID) for business staff, customers and other visitors, thus minimising the cost to business of lost production

if staff are delayed and reduced income if potential customers are unable to easily visit a business in a timely manner.

- o Easy access into, around and out of the BID for trades people and business representatives again minimising the cost to business of lost production and enabling businesses in the area to access work projects and other opportunities in other parts of the region in a cost-effective manner.
- o Efficient local transportation of goods and materials in, around and out of the BID, minimising the cost to business of congestion delays.
- o Efficient transportation of goods and materials across and out of the region again minimising the cost to business of congestion delays.
- o The provision of local connections to alternate modes of transport for goods and materials into and out of the BID other than just transportation by road.
- o The transport and infrastructure systems to cope with the predicted population growth and housing intensification avoiding any increase in congestion and travel times for both people and goods.

What are your general comments on the RPTP?

BNH agrees that a well-planned public transport network supported by high quality information and quality infrastructure gives public transport (PT) the potential to become the preferred travel choice for more Aucklanders, hopefully initiating the behavioural change required to reduce vehicle kilometres travelled, particularly in cars. This would hopefully reduce congestion on our roads enabling far more efficient movement of people, goods and materials for businesses, reducing the cost of lost production and transport delays that many businesses are currently incurring.

BNH acknowledges that AT is endeavouring to support Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan by reducing emissions through introducing low emission or no emission buses, trains and ferries to the fleet. We would however note that AT needs to ensure that the necessary charging infrastructure needs to be available within identified timeframes to enable all of these new travel modes to be fully operational at the earliest opportunity.

BNH would question AT's ability to reach the Climate Plan target of 550 million passenger journeys per year by 2030 outlined in the Transport Emissions Reduction Pathway (TERP) given that the mid-2023 figure sits at only 80 million.

BNH requests that the management of on and off-street parking under the Room To Move – Tāmaki Makaurau Auckland's Parking Strategy 2023, is undertaken in a transparent way, with genuine local consultation before any decisions are made, always taking into account the effects of any proposed changes on local businesses.

BNH agrees that to avoid adverse equity impacts, the implementation of congestion charging must be supported by significant improvements to PT, walking and cycling/micro-mobility modalities. Additionally, AT must ensure that adequate measures to protect those who can't use other modes are in place, particularly for businesses moving goods, materials or employees to other sites who must not be penalised with excessive charges for simply going about their normal business supporting the local, regional and national economies.

We agree that service improvements to add frequency to existing services and introduce new services is critical if people are to view PT journeys as an effective alternative to car journeys. Additionally, AT must ensure that the necessary major and smaller scale infrastructure projects required to facilitate an effective PT network and access to it, are completed to scale and on time. Infrastructure improvements can't solely focus on the direct needs of the transport network but must also include improving the infrastructure that gives patrons the ability to access PT services, thus making access to PT easier and more attractive to potential patrons.

BNH also agrees with the introduction of competition to keep PT pricing down as long as the service provider, if it isn't AT, doesn't compromise the level and reliability of the service.

Additionally, BNH supports the feasibility of introducing local on-demand services provided that they are affordable and can effectively replace existing poor performing services, whilst giving customers a better experience.

The timeframes for the delivery of the plan take a logical approach, particularly the short-term focus which aims to address recent feedback to AT regarding the reliability or rather the lack thereof, of services and the recovery of patronage levels which remain well below pre-COVID levels. These are both inextricably linked as people who previously used PT will only return if the current levels and reliability of service improve. AT needs to get both reliability and patronage levels back to where they used to be as soon as is practicable, as improvements can only be viewed as credible once the previous levels have been exceeded.

BNH believes it is crucial that AT achieves these short-term goals as without them the ability of AT to deliver the remainder of this plan would be questionable at best. AT has stated on a number of occasions in the supporting documentation that the necessary funding to achieve many of the outcomes cannot be guaranteed, so it is imperative in the short-term that AT's income from patronage meets the levels required to guarantee their own funding commitments. Should this not be the case, trying to convince other funders to commit their financial support will prove extremely difficult, thus jeopardising many of the planned outcomes of the RPTP.

The range of service changes and improvements listed under the medium-term focus will doubtless all improve the PT network however, BNH has some concerns that the key infrastructure projects required to enable these changes to services may not be completed due to the financial constraints noted above.

BNH supports the improvement initiatives identified in the plan, particularly those on the North Shore which will hopefully enable more effective movement of goods and people in, around and out of the BID, thus improving business productivity and reducing the cost of transport delays to business.

BNH notes AT's concerns in the long-term focus, which echo our own concerns regarding Council's TERP targets, that 'the funding we currently have will not enable us to meet these targets – significantly more operational funding would be required to run the number of services needed to carry the TERP's target of 550 million boardings per year by 2030. Achieving a network that would attract the full target would also need significant investment in infrastructure, to further improve journey times, enable more services, and improve the efficiency of supporting facilities'.

Regarding the plan's Vision to:

Massively increase public transport use to reduce congestion, improve access for Aucklanders, support the economy and enhance the environment
and

Goals:

1. Services Providing an excellent customer experience
2. Enhancing the environment and tackling the climate emergency
3. Safe and accessible transport for everyone
4. Integrating public transport into a growing Auckland
5. Funding and delivering public transport transparently

BNH would make the following observations:

- We admire the ambition of both the vision and goals but are somewhat concerned as to how AT is going to be able to achieve them all, particularly given the funding uncertainty noted in the supporting document and this submission.
- BNH fails to see how AT can achieve the TERP target of 550 million annual boardings by 2030 noted in Goal 2, when in Goal 1 reaching 150 million annual transport trips by 2031 is the target.
- BNH is concerned that AT's PT improvements and integration under Goal 4 will not be able to keep pace with the planned housing intensification and population growth.
- We believe that under Goal 5, in addition to the Local Boards as stated, AT must include the BIDs in collaborations and in meaningful and transparent engagement on plans and projects involving a BID area.

BNH acknowledges and supports AT's commitment to include Māori outcome initiatives throughout the RPTP.

Following the recent announcement regarding the Second Harbour Crossing, BNH acknowledges the inclusion of the project in the RPTP and asks that AT works collaboratively and quickly with the other agencies involved to bring the project to fruition in a far more timely manner than outlined, with work currently only scheduled to start 'by the end of the decade'. Whilst we appreciate the enormity of the project, we believe that the preparation schedule of another 6.5 years before work begins has to be reduced.

BNH trusts that all the policies required and affected by the implementation of the RPTP will be developed or amended within any required timeframes to enable the smooth and complete delivery of the outcomes noted in the RPTP.

Conclusion:

Overall BNH supports the Vision, Goals and Actions outlined in Auckland Transport's Regional Public Transport Plan 2023 – 2031. However, we would respectfully point to the various caveats to that support and requests contained in this submission which we would ask AT to take note of and



give due consideration to as future development decisions are made and parts of the RPTP are implemented.
Should there be any questions or other matters arising from this submission, we would be pleased to respond to these.

Clevedon Community and Business Association

This feedback is provided by the Clevedon Community and Business Association (CCBA).

The draft Auckland Regional Public Transport Plan 2023-2031 (RPTP) states under the Goal 1 and 3 Policies and Actions that AT will identify appropriate public transport services and facilities for rural townships with at least 2,000 residents (and others that can logically be served by routes travelling to such townships). The CCBA support servicing rural townships with a population of at least 2000.

Clevedon is growing into a rural township with a resident population that will exceed 2000. It is our submission that the population will reach 2000 within the life of the Regional Public Transport Plan 2023-2031, that planning should be commenced for a 'Rural Township Service' and that the service should be specified in section 7.5 of the RPTP. We provide the following resident population information (existing and proposed) in support of this.

This information in the table below is based on our knowledge of the resource consents that have been submitted to Council and are either being processed, or have been approved and development is underway, and those that have been implemented with dwellings now occupied. We have used an average occupancy of 3 person per new dwelling, and one per minor dwelling. As set out below, in the next few years, the resident population of urban Clevedon will reach 1951 and this excludes rural communities that would be served by a public transport route through Clevedon such as Ardmore and Kawakawa Bay. It also excludes recent countryside living subdivisions close to Clevedon Village (e.g. Riverside Way & Rossbern Lane). We submit that a public transport route from Papakura train station, through Ardmore to Clevedon and on to the Pine Harbour ferry and back again would provide good access for residents to nearby communities, services and other public transport (train, ferry). The bus service to Pine Harbour ferry could also provide public transport to the proposed High School at Beachlands. The connection to Papakura Train Station would mean residents could access the Auckland Airport without requiring expensive shuttles or taxis. A bus service, combined with the cycle trail network that is being implemented around Clevedon Village will enable and support modal shift.

Clevedon Population	# Persons
Clevedon Village 2018 Census (Meshblocks 762900, 763000, 763100, 763400, 763500, 4002595, 4002594)	624
Resource consent granted, sections sold and dwellings built since 2018	
Clevedon North (62 sites, 3 people per dwelling)	186
Benjamin Place (22 sites, 3 per dwelling, 1 per minor dwelling)	77
Munro Oak and Tuawa Lanes (24 sites, 3 person per dwelling)	72
Resource consent granted and construction underway	
Metlifecare (Population expected by Metlifecare in villas. Excludes care home.)	170
Clevedon Meadows (200 sites, 3 people per dwelling)	600
Renee Wyn Place (9 sites, titles issued, many sold, 3 people per dwelling)	27
Resource consent granted and sections for sale	
35 Monument Road (9 sites, 3 people per dwelling)	27
Conmara South (56 sites, 3 people per dwelling)	168
Total (excluding rural hinterland and countryside living subdivisions (e.g. Riverside Way and Rossbern Lane), Ardmore, Kawakawa Bay)	1951
Resource consent lodged Approx Hectares Single House Zone	
Conmara North (bulk earthworks consent)	18ha
Resource consent not lodged	
62 Monument Road	15ha
Total	32ha

The CCBA accept that the population requirements may not be met at present, but we submit that will be met well within the life of this RPTP and that a future Rural Township Service should be specified in section 7.5 so that they can be planned for and appropriately funded. The CCBA regularly work with the Local Board, Ngāi Tai ki Tāmaki, local developers/landowners and other Council agencies and would be happy to engage with AT in relation to route planning and discussing appropriate locations for bus stops in Clevedon Village.

Community Waitākere

General comments to improve PT

From a climate change and community perspective we know that we need a better, more reliable, connected public transport system to encourage people to switch from cars.

Speaking from a West-Auckland perspective, the focus needs to be on getting:

Kids to bus/ cycle / train to school -particularly around the Rathgar Road area where a number of high schools converge and there is bad traffic and the opportunity to increase public and active transport

families using train/ bus in the weekends (promotion of public transport being tied into events, greater focus on public and active transport to Local Board events (e.g. Waitangi at Waititi), creation of resources/ stories e.g. in Our Auckland about day trips families can take on the bus).

Giving residents in isolated areas such as Piha and Karekare and Laingholm better access to public transport (supporting local, community-led public transport initiatives that allow for remote areas to be serviced) and

INFRASTRUCTURE

Cycle paths to all schools

Low-carbon buses (electric)

“Fun” paths to train stations - artistic paths or yellow footprints connecting a train station with one key venue e.g. Corbans Art Estate connected to Henderson Train Station or Hoani Waititi marae connected to Parr’s Park.

Put more charger inputs on every bus - allows people to work on buses

Need to plant more trees around bus interchanges and train stations to allow for more shade when walking in summer (connects in with Urban Ngāhere strategy)

More facilities at train stations - toilets, bike parking

Education/ information: More information at key bus stations/ community info points e.g. libraries - where can you top up your hop cards, what are some places you can get to by bus etc. Better guidance on what buses to take when the trains are not working. Staff at the train station offer no help

Education/ information: More information at train stations - map of where you are the what’s around you (like in London at the metro stations), information about where to top up locally

Topping up Hop cards - let libraries top up Hop Cards. This makes it easier and less confusing for public transport users.

Public transport hubs - need to consider access by foot or bike to hubs e.g. Henderson and new interchanges at Lincoln Rd and Te Atatu. Also need to consider buses that link to these particular locations. Bike storage options etc.

On bike paths have e-bike and scooter check in and out systems, you would check the bike out and return it at the end of the track, with an alarm so it will stop if it's put back into the check in and out area.

Would be great to be able to buy Hop Cards at the train station or pay cash.

Cash fares on buses should be an option.

Transfer services: If you get a bus from town to Lincoln Road and change to Rangiwhai and have no money on your card you would potentially be stuck

MORE SERVICES, AND MORE REGULAR

Being able to depend on it to actually run regularly

Employ ambassadors and have a huge focus on public transport e.g. change February from Bike to Work month to public transport to work month and do a mass give away of hop cards and events at train stations etc. And maybe free public transport for a week to encourage people to try taking public transport. Get AT transport planners involved with different organisations (there's a size limit at the moment for access to transport planning, plus the groups are really busy and don't promote their services).

Bus services for people working shift work e.g. to hospital or factories.

Make it easy for schools to get Hop cards to kids. - AT should be working with schools to have a week or two at the beginning of the year where they are in the school and providing hop cards and signing people up to top up especially in larger high schools and kura kaupapa.

AT should be encouraging schools to set up walking/ biking groups even in high schools.

Connection between Glendene and Glen Eden.

Better train frequencies in weekend and off peak.

Free travel for pensioners are not in the right hours that are needed if still working.

Sunnyvale resident working full time in Silverdale only uses public transport doesn't drive. 6 buses a day or 1 train and 2 buses

Monthly pass is expensive, buses are unreliable since covid

Out of the blue cancellations means sometimes hours waiting to get home

Taxi/ communal bus service for people with disabilities e.g. <https://tfl.gov.uk/transport-accessibility/community-transport> Community Transport systems in UK

MISSING CONNECTIONS BETWEEN AREAS:

Why is there no bus that goes from Glen Eden to Rangiwhai along the main road?

Any available public transport in Henderson Valley/ Scenic Drive (currently there is nothing)

Have a more reliable service for Helensville

Promote and support 'on-demand' services for West e.g. communal bus service for people that is developed with local communities

Consider a Western line that connects people with our Western beaches e.g. running on the weekend 5 times a day going to Piha and Karekare, one that goes to Huia/ Whatipu etc.

MARKETING FOR EVENTS

Tie events with free transport (e.g. free train to rugby games) and PROMOTE THIS!

PRICING STRUCTURE

No charge for just going 1 - 3 train stations

Free hopcards

Free weekends

Use a capping system

The Waiheke ferry is too expensive! 59\$ return is too much.

End Urban SUVs

Vision	
<i>The vision needs major changes</i>	We need to have congestion charges for cars and also toll roads. Also compulsory vehicle compliance standards so the most polluting cars are off the road or cleaned up. Funnel massive investment into public transport.
Goal 1: Customer experience	
<i>The goal is great as it is</i>	On time and frequent and cheap.
Goal 2: Environment	
<i>The goal is on the right track but needs some minor changes</i>	Make cars off the road this is more impactful
Goal 3: Accessibility	
<i>The goal is great as it is</i>	NB: No further comments
Goal 4: Growing Auckland	
<i>The goal is great as it is</i>	NB: No further comments
Goal 5: Funding	
<i>The goal is great as it is</i>	NB: No further comments
Policies	
We need more investment.	
Current problems	
<i>The initiatives need significant changes</i>	Need these changes faster. Finish the cpl
Frequent services	
<i>The proposed actions are great as they are</i>	NB: No further comments
Travel times	
<i>The proposed actions are great as they are</i>	NB: No further comments

Cheaper fares

The proposed actions are great as they are

NB: No further comments

Communications and technology

The proposed actions need significant changes

Make phone payments allowed. Drivers able take cash for tourists

Safer public transport

The proposed actions need significant changes

More security needed.

Weather resilience

The proposed actions are great as they are

NB: No further comments

General comments on RPTP

This is generally great but needs more resources to improve the network faster than it is being improved

General comments on improving PT

First you need to make driving more expensive slow and inefficient. Add toll roads into the CBD and peak hour congestion charges. Make vehicle wofs every 6 months with tougher standards and take highly polluting cars off the road.

Fletcher Residential Limited / Fletcher Living

18 August 2023
Auckland Transport
Via email: rptp@at.govt.nz
Submission on Auckland Transport's draft Regional Public Transport Plan (RPTP)

Introduction

(1) Fletcher Residential Limited (trading as Fletcher Living) (FRL), is a wholly owned subsidiary of Fletcher Building Limited. FRL is one of the largest developers of new residential communities in New Zealand, having built and sold thousands of homes in the last 5 years. We are experienced developers, master planners, designers and builders of quality homes that are developed to meet the community needs, whether that be social, affordable or open market product. We deliver a full mix of typologies, including apartments, townhouses, and houses. Currently, we have over 20 developments underway in Auckland, located across the full spectrum of urban and suburban, brownfield and greenfield locations and our pipeline is in excess of 5,000 dwellings.

(2) Our primary focus is the creation of sustainable and well-functioning communities that are serviced appropriately by active and public transport routes. The draft Regional Public Transport Plan (RPTP) will have impacts on our existing and planned communities and as such, is of interest to FRL.

Summary of Submission

(3) Overall, FRL is supportive of the intention and goals of the draft RPTP. As one of the largest developers of new residential communities in Auckland, the increase in the frequency of public transport, the accessibility to all users and a resilient transport network aligns with our desired outcomes for our communities. In addition, the focus on reducing carbon emissions and adopting the objectives of Auckland Council's Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan and Transport Emissions Reduction Pathway (TERP) is highly supported.

(4) However, there are a number of opportunities that are missed within the Draft RPTP that should be considered to positively address the goal and policies outlined in the document. These are addressed within this submission below.

Opportunities for improvement – bus routes

(5) The Draft RPTP sets out the proposed changes to bus routes and frequencies across the Auckland network. In many locations, FRL are expanding existing communities or creating new ones that could benefit from minor changes to these routes and in turn, increase potential patronage on the public transport network. Each of these locations are discussed further below.

Park Green

(6) The draft RPTP suggests an extension of the route of Bus 377 through to Park Green from late 2025 "as the area develops"

(7) FRL proposes that the timing of this route is brought forward given:

a. The infrastructure (bus stops) are already in place within Park Green
b. FRL currently have over 60 homes sold and occupied, and by the end of 2024, FRL expect to have close to 200 homes sold and occupied. In addition, Hugh Green Group have also sold a number of homes within the development.

c. Mangapikopiko Primary School is already operational (as of July 2023) with a roll of over 100 students. This will continue to grow over the coming years as more development in the area is completed.

(8) FRL also propose that Auckland Transport consider an alternative bus route through the Ngakoro Road extension to service Park Green and the Ngakoro Road:

a. An approved resource consent (Auckland Council reference BUN60411308) will enable the extension of Ngakoro Road through to Park Estate Road. This will be completed and vested with Council by 30 June 2024.
b. Future bus routes were discussed as part of the consenting process for Ngakoro Road, and there is existing infrastructure in place on both Ngakoro Road and Park Estate Road.
c. The extension of a bus route through Karaka Lakes would also service the existing community off Ngakoro Road.

(9) Therefore, FRL submits that AT revisit the proposed bus routes servicing the Park Green area and acknowledges the existing development that has been completed and the committed infrastructure upgrade that will continue to grow the Park Green area.

Waiata Shores

(10) The draft RPTP does not include any changes to the existing route 33 on Great South Road, nor propose any new routes to service the new Waiata Shores or existing Conifer Grove communities.

(11) While the RFTP makes mention of an on-demand service for Conifer Grove and Waiata Shores, as well as School route S057 between Rosehill College and Waiata Shores (afternoons only), there is no indication of a fixed route before 2031.

(12) The Waiata Shores development infrastructure is complete, with 70% of the 700+ homes completed and occupied, with the remaining homes to be finished and sold within the next 24 months.

(13) Through the design and consenting of the Waiata Shores community, Auckland Transport has consistently pushed for a bus route through the development, and FRL has constructed all necessary infrastructure to allow for this (including bus stops).

(14) Auckland Transport has also noted that a new road connection at Keywella Drive (linking Conifer Grove and Waiata Shores), to be funded and constructed by FRL, is necessary for a permanent bus route. (15) Therefore, FRL proposes that a permanent bus route is considered to service both Waiata Shores and Conifer Grove, as has been requested by Auckland Transport, and that utilises the assets constructed and funded by FRL.

Flat Bush

(16) The draft RPTP notes a new bus route 358 (Ormiston Town Centre to Manukau, via Ormiston Rise) to commence in late 2025.

(17) FRL is supportive of a bus route that services this area of Flat Bush, but is disappointed that the new development between Flat Bush School Road and Murphys Park Drive is not serviced by the route, for the following reasons:

a. Through the design and consenting process for the development at 231 Flat Bush School Road (identified in Figure 1 below), Auckland Transport has pushed FRL hard for the inclusion of bus infrastructure, including Swedish speed tables and kassel kerbs at new bus stops (the inclusion of which required a masterplan redesign), as well as a new roundabout on Murphys Park Drive to allow for buses to safely turn into the development.

b. The development consists of 168 homes, of which 31% are affordable homes aimed at first home buyers, which are generally single car households. These occupants would likely rely on public transport alternatives and would have anticipated a public transport service given the presence of new bus stops (requested by AT).

c. The development is adjacent to the future Auckland Council public sports fields (due for completion in the next 5 years), which will be used extensively by the south-east Auckland community.

(18) FRL submits that consideration should be given to a variation to route 358 that includes the north-south road which links Murphys Park Drive and Flat Bush School Road (refer Figure 1 below).

(map attached: Figure 1: FRL's development in Flat Bush, where bus stops have been provided but where no bus route is proposed.)

Red Beach

(19) The draft RPTP proposes a change to route 983, with its service limited to between the Hibiscus Coast Station and Manly, with a new route 99 servicing Gulf Harbour east of Manly. Included in this change to route 983 is a change to the route to include Taikura Avenue, Tyler Davis Drive and Kukuwai Avenue.

(20) The timing for these changes is noted as from 2027, following the completion of Ō Mahurangi (PenLink).

(21) FRL is supportive of the changes to route 983 but proposes that the timing of the change to the route noted in (16) above should be brought forward, given:

a. The area that will be serviced has been fully developed (as part of FRL's Peninsula Golf Course redevelopment), with all infrastructure (including bus stops/shelters) having been completed more than two years ago;

b. 80-90% of the 450+ homes in the development are completed and occupied;

c. Both MetlifeCare and Vivid Living retirement Villages will be fully occupied within the next 12 months.

(22) Therefore, FRL submits that AT review the timing for the proposed change to bus route 983 as this should reasonably be brought forward to the end of 2024, rather than 2027.

Riverhead

(23) Currently, bus route 126 services the Riverhead area, with a connection provided to both Westgate and the Albany Bus Station. It is the only service that supports Riverhead and classifies the level of service as 'rural township'. This is not proposed to change within the timing of the RPTP.

(24) There is approximately 80ha of land in Riverhead zoned Future Urban under the Auckland Unitary Plan (AUP) that, under the Future Urban Land Supply Strategy (FULSS) is scheduled for release in 2028-2032.

However, FRL has lodged a private plan change application with Auckland Council to have this land rezoned sooner. When approved, the private plan change will enable a growth in the population of Riverhead by up to 3500 people, and this will occur within the next 8-year period that the RPTP will apply to.

(25) This anticipated growth will provide a notable increase in the possible patronage on this service and if no increase is proposed, could place unnecessary pressure on the rural township service.

(26) Therefore, FRL submits that an increase in the 126 bus service to Riverhead should be proposed under the RPTP subject to funding and an approval of the private plan change.

Opportunities for improvement – Heavy Rail

(27) New Zealand's Government and several territorial authorities have declared a climate emergency and have made a commitment to reduce carbon emissions in New Zealand. One of the largest contributors of emissions is the transport sector and, in our view, the draft RPTP ignores an opportunity to contribute to the reduction in carbon emissions by taking advantage of the existing North Auckland Rail Line (NAL) and extending the passenger rail service.

(28) The NAL runs through Auckland and extends as far north as Whangarei. Beyond the current passenger network (where the Western line terminates at Swanson), the existing track is used only for freight services but has been subject to significant investment by Kiwirail in recent years. Up until 2015, a passenger rail service was provided beyond Swanson to Kumeū, providing a key connection to other parts of Auckland. However, with the closure of this service, decent investment in the Northwest (outside of Westgate) has been ignored and the draft RPTP does not propose any change.

(29) Based on feasibility investigations we have commissioned, the technical advice received is that passenger rail services can be re-established on the NAL without the need for a full, double track, electrification upgrade to the existing infrastructure. Ultimately, the findings conclude that a fast, frequent and convenient service to the CBD can be provided with sustainable technology on the existing rail infrastructure. (30) Crucially, the provision of a passenger rail service from Huapai and Kumeū to the CBD can be achieved in a significantly shorter timeframe than that proposed by the recently lodged Notice of Requirements for rapid transit along State Highway 16. It is noted that the lapse period for the designation has been sought for 20 years to align with future growth but ignores the needs of the existing communities. As the NAL is existing infrastructure, the re-establishment of passenger rail to Kumeū and Huapai could occur within a number of years, not decades.

(31) We accept that an integrated transport network requires planning and funding and that this takes time. However, discounting the viable option of passenger rail services to Kumeū and Huapai is a missed opportunity, in our view, and is something that should be considered within the RPTP.

Gulf Harbour Ferry Group Representative

Kia ora AT,

Firstly, it is with great disappointment that no representative from AT has made any effort to liaise directly with us for the purpose of engaging our community. The good faith relationship established between Fullers and AT in October 2022; is eroded through your deliberate failure to do so.

Secondly, we Administrators to the Gulf Harbour Ferry Group are in disbelief at the media release announcing further degradation of the service on the final day of the consultation to withdraw this vital service, a day after an announcement that replacement bus services will operate from commerce street.. This informs deliberate actions by Fullers, sanctioned by Auckland Transport as part of a longer term plan to 'condition' people into acceptance of bus travel.

We do not support the proposal to withdraw the Gulf Harbour Ferry Service circa 2028. We need to see tangible efforts to improve the existing service and restore it with consideration to trialling a boat as an option. Thank you though.

If Fullers, who are contracted to AT with an SLA; are unable to fulfill contractual obligations and as such are reducing services to Gulf Harbour, amongst other route cancellations; then AT is charged with the responsibility for holding Fullers to account as they are in breach of that agreement. The Gulf Harbour service has been absolutely neglected and targeted with sabotage since May 2022 with already heavily reduced services axed, in lieu of bus replacements. A Bus is NOT a ferry - it can not possibly offer the same service.

The majority of group members in the Gulf Harbour Ferry Group; have confirmed, they will NOT transit on 3 buses to get from the Eastern end of the Peninsula to their place of employment; on a journey proposed in the absence of true timing data. AT Data provided calculates transit from the Manly shops at 60minutes. We have time tracked travel time from multiple addresses in our community by car and refute this timing. It takes 26 minutes to drive from Okoromai Bay to the New World at Stanmore Bay. If in a bus, stopping every few stops to load/offload; that time would likely be closure to 35 minutes. Notwithstanding the narrow roads that will result in more congestion as there is no safe passing capability along the two lane bidirectional Whangaparaoa Road. That takes you to the start of Penlink- add another 45 mins to the city and you have approximately an hour and 20mins excl. bus transfers required and delays waiting for the next bus. That does NOT compare to 50mins and a walk/scooter/bus/bicycle to the work destination.

We are aware of greater than 1350 individual submissions in favour of retaining, improving and enhancing the ferry service between the Whangaparaoa Peninsula and Central Auckland - this is our harbour crossing and significantly reduces traffic congestion and carbon emissions when fully in service. Further to this, we expect there have been submissions made directly via the AT Platform. We urge AT to do the right thing, listen to our community and engage with us for solutions.

The lack of knowledge of our community means the consultation process has excluded a large proportion of our community due to isolation, lack of access to online platform (per individual choice); no face to face community walk-ins by AT in our location - the closest being Rosedale. To this end, we have reached out to our community visiting every address to provide transparent fact based information. Attached are the submissions received from community members who do not have access to the web based platform or email. These are attached and we expect these will be included as valid submissions.

The demand for services was there with the previous operator; in came Fullers and the reliability has been jiggered with; so now people do not trust the service. We are aware of over 5000 signatures on a petition that has been received by AT as prat of another persons submission.

We know there has been no specific environmental impact assessment undertaken in relation to the proposal withdrawal of this service. This is negligent on AT's part when proposing to remove a lifeline for a community that is isolated at the end of a peninsula and does not adhere to

recommended Civil Defence and Emergency Preparedness policies; let alone proposing something so significant without due diligence or provision of information until after the fact.

We understand AT stated they stated the emissions related to ferry services, which informed the proposed withdrawal of the service. This can not be true. LGOIA request revealed that the per passenger CO2 emissions are significantly less per passenger on the Gulf Harbour route; in comparison to that of the Pine Harbour Ferry service - from AT's own data. Yet Gulf Harbour face a 47% failure rate and Pine Harbour - 0%. Who in Pine Harbour is bank rolling it? Please refer to submission made by Christine Beckett.

On review of route data, AT data and local data from the Commuter group; we know pre 2020 when Discovery360 operated the route; we were not plagued with the neglect and cancellations or replacement buses now presented with. It is clear to our community that AT, Fullers or both: have engineered reduced patronage to serve their own agenda and intent to make the most of a fleet of electric buses invested in rather than seeking to understand what the community needs and wants. To now cancel further passage due to training requirements; some four years post covid19 pandemic; suggests Fullers have sat naval gazing waiting for the chance to pull back and scrap the Gulf Harbour route. Fullers should have never contracted additional sailings on other routes, with the knowledge they would not be able to meet the full network requirements. There is no competition for Fullers and the Monopoly is becoming fragile. We are aware of 4 potential operators willing to support the Gulf Harbour service and deliver a service designed with the community.

The proposal made does not align with Road toll to zero - by putting more buses on the road, increasing congestion and negatively impacting mental health of our community members; fatigue and distraction is more likely to result in this not being achieved. It makes no sense to put a bus on the road capable of taking 50 passengers, when 1 ferry can take 247.

We know Auckland Traffic will be gridlock in 15years. There is not sufficient funding to remedy all road infrastructure required to safely traverse from the proposed Penlink to the Eastern most end of the Peninsula; yet AT is proposing to put buses on every 15mins and scrap the ferry - we have the blue highway, we should be making the most of it. If numerous ports around the globe can get it right with their ferries; what is Fullers doing?!!! There is no evidential data suggesting that the carbon emissions per person would be reduced by utilisation of these buses. We question how AT can put forward a proposal without completing due diligence. Hybrid electric ferries are a great concept and we are supportive of them, yet it seems odd to decarbonise the ferry fleet then plug them all into the Grid that can't cope with the draw so in goes coal to burn electricity.

There are currently 86 approved lots under Development with Hopper Developments LTD. We are aware the Gulf Harbour Country Club may have an application pending, to change the zoning of the the land (which has an encumbrance) to residential. If the undesired outcome of an additional 4500 houses; this community is growing rapidly. Why would AT propose to remove a service that has the potential to so much more in the future.

We have full support from Ngati Manuhiri representatives; that our local iwi absolutely do not, or in any way endorse the RPTP. We must collaborate with our Te Tiriti Partners.

We are most concerned at how poorly considered this plan is - there is a distinct lack of evidential data to support AT's position.

Most importantly - the psychological impact of this intentional service degradation has severely impacted what to expect in the here and now vs. What it will be like in the future. We can't answer that but those involved with planning and design need to factor that information.

We invite you to liaise with us as part of the consultation process - please reach out to us should you choose to do so.

Noho oro mai,

Anna, Glenn, Tessa & Jonathan



Gulf Harbour and Army Bay

Gulf Harbour Yacht Club Inc

SUBMISSION IN RESPONSE TO AUCKLAND'S DRAFT ' REGIONAL PUBLIC TRANSPORT PLAN 2023-2031'

Submitted on behalf of GULF HARBOUR YACHT CLUB INC, 1299, Laurie Southwick Parade, Gulf Harbour 0930
admin@ghyc.co.nz

This submission is to oppose the withdrawal of the Gulf Harbour (GH)Ferry Service when Penlink is completed, and replace it with buses.

GULF HARBOUR YACHT CLUB (GHYC) is situated at the eastern end of the Whangaparaoa Peninsula. The club has a diverse membership of both locals living on Whangaparaoa Peninsular and wider Auckland.

We advocate on behalf of the GHYC, our members and the local community of which we are an active entity.

The RPTP describes the role of Public Transport (PT) in Auckland as: Public transport (PT) contributes significantly to the quality of life of Aucklanders by increasing genuine and flexible travel choices.

Withdrawal of the GH ferry service will have a direct impact on the lives of everyone living on the Whangaparaoa Peninsula. There is currently only one possible road link between Gulf Harbour/ Shakespear Regional Park and the rest of the peninsula. The road is already congested for much of the day and increasing buses and private vehicles will only increase congestion and put more pressure on an already stressed and fragile infrastructure. The Penlink will provide an additional roading option, but no alternatives to road-based transport and no dedicated bus route.

The ferry service serves two important roles, providing a direct PT link to central Auckland for all the area's community and a convenient route for inbound visitors and tourists to the Whangaparaoa Peninsula, both of which provide economic benefit.

For domestic & international tourists, selected services also continue as the only PT route to/from Tiritiri Matangi . This is an ideal route to be incorporated into inbound tourism which Business Whangaparaoa amongst others are working on.

IN SUMMARY

The ferry offers a fast, non-stop travel option.

The alternative PT option is a bus service, using existing and proposed roading, no dedicated bus lane. The service requires transport changes, which many people find more stressful, less accessible, and definitely less comfortable and lacking amenities.

Removal of the ferry service is totally contrary to the stated purpose that Public transport (PT) contributes significantly to the quality of life of Aucklanders by increasing genuine and flexible travel choices.

Herne Bay Residents Association Incorporated

AUCKLAND REGIONAL PUBLIC TRANSPORT PLAN 2023 – 2031 (RPTP)

SUBMISSION from
HERNE BAY RESIDENTS ASSOCIATION INC.
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The Herne Bay Residents Association Incorporated (HBRAI) makes the following submission to Auckland Transport (AT) on the proposed RPTP 2030 – 2031. This submission follows the content of the feedback form issued by AT on the 'Have Your Say' site.

1. POLICIES (refer to Table 3, RPTP 2023-2031)

The RPTP is driven by the need to reduce congestion and climate change effects. Cost overruns cannot be ignored by plans not properly costed to suit the funding. The CRL is a case in point. Funding shortfalls will have to be recovered from the Auckland ratepayers.

There are 17 Policy areas; these are all subject to funding, but can be grouped under two main headings, with some overlapping:

- 1.1. Planning and Design:
 1. Service Planning & Design
 2. Rapid and Frequent Infrastructure and services
 3. Quality of services.
 5. Low Emission system
 6. Sustainable approaches
 7. Resilience to C/C
 8. Inclusion/accessibility
 11. Multi-modal access
 12. PT and Land use integration
 13. Procurement, delivery, funding.
 14. Partnership
 15. Collaborating with operators

These are all important matters, so generally get the “Great” approval. HBRAI raises the following points.

1. Planning and Design – needs to be thoroughly processed to best achieve the outcomes sought/needed. Critical needs must be dealt with first and function over form is important.

5. Low Emissions – AT’s vision is to ‘massively’ increase PT; at present the bus operation is fossil fuel powered and only set to be 75% reduced by 2031. This service increase will add significant CO2 emissions, in opposition to the RPTP plan. There has recently been a uptake recently in EVs.

11. Multi-modal access – Scooters have enjoyed a surge in alternative transport means, but have been under-regulated, adversely affecting pedestrians, on previously safe, sidewalk spaces. Strict regulation on users/providers is a necessary requirement.

12. PT and Land Use integration – The Government has set unrealistic new urban housing development guidelines, with little or no consideration for many factors, such as hard surface increase (flooding acceleration), unsuitable densities in certain areas, inadequate existing infrastructure to cope, mental health effects of ‘living in shade’, amongst others. With a major force, driven by Kianga Ora and development companies seeking work opportunities and profit, AT will become a secondary player, forced to adjust transport plans in accordance with housing development schemes. HBRAI fear this (control and planning) matter requires serious consideration.

1.2. Customer Satisfaction:

- 1.2.1.1. Customer Experience
9. Fares and Pricing
10. Safety
13. Service Delivery, monitoring

16. Service Changes process

4. Of course, everyone wants an efficient, reliable public transport service. The current status does not fulfil this and a lack of positive customer experience will prove costly to ratepayers.
9. Cheaper fares for those identified must be implemented. Funding has to provide for this.
10. Safety is an absolute must, not a goal.
13. Ditto service delivery. Poor delivery will result in the public resorting to using private transport means, despite a huge cost in PT provision.

HBRAI recognize the driver shortage issue, but that is basically a funding issue, one that has long been ignored. Once this matter and the rail upgrade has been completed, these services will be much improved and better used.

2. GOALS

2.1. Goal 1 – Services provide excellent customer satisfaction.

2.1.1. There are other 'customers' of the roading system – for example commercial, multi-stop travel routes - which cannot rely on PT. These users should not be adversely affected by the PT developments.

2.1.2. At peak periods, bus lanes are acceptable, but off peak, these lanes should revert to general vehicle use and or parking.

2.1.3. On-demand transport operators (smaller vehicles, not buses) should be operational during the off-peak times.

2.1.4. Cycling lanes have proven extremely expensive on a \$/km basis and do not carry anywhere near the volume for significant vehicle reduction.

2.2. Goal 2 – Enhance the Environment

2.2.1. Increased PT services mean increased CO2 (at present). Fossil fuel emissions should be minimized, not increased. RPTP says this matter will only be fully addressed by 2035.

2.2.2. Train and ferry services improvements re emissions is good news.

2.2.3. The major uptake of EVs must be a consideration in the aim of reducing emissions affecting climate change, yet infrastructure to support this is essential – charging stations, as an example.

2.3. Goal 3 – Safety, access...

2.3.1. Safety must be an imperative, not a goal, ditto access.

2.4. Goal 4 – Integrating PT into a growing Auckland.

2.4.1. It makes sense to align transport corridors with new housing developments, but AT needs to limit PT to a planned transport layout.

2.4.2. Population trends will change -probably have since Covid, a work from home lifestyle and a declining Auckland city population. These need to be considered in PT planning.

2.5. Goal 5 – Funding and transparent PT delivery

2.5.1. These goals are great, but Value for money/investment is imperative.

2.5.2. Funding, then infrastructure provision is key.

3. ACTIONS

AT lists 8 actions; mostly these are obvious and absolutely necessary – some have been noted above.

- i. Fixing current problems with PT -driver shortage
- iv. Accessibility improvements
- v. Communications, technology improvements
- vi. Safety
- vii. Resilience
- viii. Low carbon PT

ii. Speeding up Travel times

HBRAI acknowledge the ferry, CRL and other train line upgrades, the Eastern Busway, etc. But the goal of allowing buses to “jump the intersection queue” by changing the signaling is a worrying issue and requires clarification. This will cause chaos to all other traffic (including bus services travelling in a cross route at those intersections) and render useless any attempt at trying to co-ordinate signaling in the city.

Adding bus lanes to existing roads will adversely impact all non-public transport users, which are unable to use PT. There has to be an efficient road corridor use by others.

iii. Cheaper fares – addressed above.

4. OTHER ISSUES in the RPTP

4.1. Congestion Charges

4.1.1. HBRAI understands that congestion charges are due to be implemented by 2025. It is a well understood principle that these charges should be implemented when a good PT system is operating.

4.1.2. HBRAI requires clarity on when congestion charges will commence – clearly notified. What happens to those ‘captured’ within the initial congestion zone, with respect to travel inside that area.? Are charges levied without vehicles crossing the zone limits?

4.2. Use of Bus Lanes out of peak hours by all users.

4.2.1. This has been noted above, but the relative underuse of these lanes during off peak hours goes against the AT principle of the ‘best utilisation’ of the road corridors. HBRAI thinks this will assist with more efficient transport throughout the city, particularly the inner city.

4.3. New developments along arterial type routes – on-street parking removed.

4.3.1. The allowance for developments to exclude parking spaces for apartment owners/tenants is an oversight and one aimed at forcing people to rely on PT. With the “integrating PT into a growing Auckland” (Goal#4) this limits public choice for location and housing type.

5. GENERAL COMMENTS ON THE RPTP

a. HBRAI acknowledges the changes needed to ensure an efficient transport system throughout wider Auckland. Climate change has demanded certain changes are made with respect to resilience and the worsening air quality. However, a one-size-fits-all plan is not the best option. This will cause the various areas in the city to succumb to a string of 3-storey buildings, with little variation in visual appearance. Lighting, open-air spaces and large vegetation will all suffer as a result of blanket intensification.

b. The city’s ‘horizontal infrastructure’ – water, sewerage, power, etc. is grossly inadequate in many places, notably in the Herne Bay / St Mary’s Bay Grey Lynn and surrounding areas.

c. HBRAI is strongly committed to retaining the existing layout of Jervois Road. The local shopping precinct along Jervois Rd is extremely well patronized, many of whom are senior citizens and make extensive use of the parking on the road for their daily purchases. Removing these parking spaces will materially affect their mobility and access to the shops. The road is wide and currently experiences nominal congestion – generally this is the queue for traffic from the Point Chevalier area to turn down Curran Street onto the motorway north. General traffic flows around the frequent and peak bus services easily.

d. The installation of a cycle lane (or lanes) would remove car parking but would not improve flows along Jervois Road. The side streets of Herne Bay recently had calming features (speed humps) installed and this has seen a dramatic reduction on vehicular traffic. This is an obvious cycle route into the city, specifically separating the cyclists from the Jervois/College Hill route into the city.

Howick Historical Village

Accessibility

The proposed actions are on the right track but need some minor changes or additions

I would like to encourage AT to re-route bus 711 through Lloyd Elsmore Park. It would cut down on parking and driving congestion and would increase accessibility to those stakeholder organizations inside the park for whom users with mobility concerns, who do not drive, are unable to access.

General comments on RPTP: Multimodal integration

As General Manager of Howick Historical Village, and member of Lloyd Elsmore Park ("LEP") User Group, I am asking that AT please re-route bus 711 through LEP. I have drawn up a map, which I can send you. I have re-routed it according to turning lanes and traffic lights, to minimize congestion and accidents. It would be an INCREDIBLE help in parking and traffic congestion - especially on the weekend when, if one, let a long two or more, LEP stakeholder org has an event, EVERYONE parks wherever they can. It is dangerous to pedestrians, children, and property. Added to which, not having a bus route through LEP means that those people with mobility issues, who do not drive, are unable to access the many things on offer in the heart of the park.

Hugh Green Limited

Submission on the Draft Regional Public Transport Plan

To: Auckland Transport

Name of Submitter: Hugh Green Limited

Address for Service: C/- CivilPlan Consultants Limited PO Box 97796 Manukau City Auckland 2241

Attn: Aaron Grey

Telephone: (09) 222 2445

Email: aaron@civilplan.co.nz

This is a submission on the Draft Regional Public Transport Plan ('draft RPTP').

1. The Submitter

Hugh Green Limited ('HGL') is a long-established management company of the Hugh Green Group, which holds a substantial portfolio of land for farming and development purposes, as well as a number of commercial and industrial property assets within the Auckland and Waikato Regions. Combined, the companies which fall under the Hugh Green Group umbrella conduct a range of businesses on their landholdings, including developing residential property for sale, developing and managing commercial / industrial buildings for lease. The portfolio includes sizeable landholdings strategically located to meet the needs of Auckland's population growth.

HGL is actively working on enabling growth around Auckland, through residential subdivision within various landholdings such as those in Hingaia, Redhills, and Flat Bush, as well as having interest in other locations within Auckland.

2. Feedback on RPTP proposals for specific public transport services/routes

2.1 Extending the AirportLink service to Botany, and associated changes

(Bus routes AIR, 31, 35, 356, 357, 358, 72)

HGL supports the proposed 358 route as a connector service between Ormiston Station and Manukau Station. To enable this route's efficient and effective operation within the draft RPTP's timeframe of 2025, including to serve its catchment of eastern Flat Bush, HGL requests that AT/NZTA commit to signalise the intersection of Murphys Road, Murphys Bush Drive and Bushfield Drive as soon as possible.

2.2 Whangaparāoa changes related to the opening of Ō Mahurangi (PenLink)

(Bus services NX2, 99, 981, 982, 983)

HGL supports the NX2 extension to Whangaparāoa along PenLink from 2027. HGL considers that this service should be in place immediately following completion of PenLink, regardless of whether a bus station has been constructed at Whangaparāoa (services can use existing bus stops in the interim). HGL notes that this service would commence prior to urbanization of the adjacent land near East Coast Road and supports the advanced provision of this service. The implementation and operation of this route alongside the development of the adjacent areas would enable those developments to maximise the potential utility and optimise connections to this valuable public transport service from the beginning of the development process.

2.3 Other Service Changes proposed in the draft RPTP

Hugh Green supports the extension of Route 377 to Park Green as a connector service but opposes the proposed timeframe for this extension. HGL requests that the extension occurs prior to 'late 2025' as proposed, and instead is carried out as soon as possible. The required bus stop infrastructure throughout the area of extension is already in place, having been constructed by HGL as part of its Park Green Stage 1 development. This route extension under current operational budgets is expected to have limited impacts on the existing route's scheduling, noting the generous layover times between services. As residents are moving into this area now rather than in 2025, the immediate extension of the service will embed reliable and available public transport into the identity of the neighbourhood that is currently emerging.

HGL supports the proposed 116 route and its proposed timing. This loop service connects several developments in the western portion of in the Redhills area to the Westgate Metropolitan Centre.

HGL supports the timeframe of 2026, as this is in appropriate alignment with various high-level development timeframes to allow for the presence of reliable and available public transport to be embedded into the identity of the neighbourhoods that will grow over time in the Redhills area.

HGL supports in part the proposed 117 route but opposes the proposed timeframe for its establishment. This service connects the Lincoln Road interchange and central parts of the

currently developing portion of the Redhills area to Westgate Metropolitan Centre. HGL notes that the proposed timeframe for this service of 2027 is at the latest end of what would be optimal to integrate public transport use into the fabric of the currently developing neighbourhoods the route would serve. Instead, implementing the service as soon as the road infrastructure becomes available is preferred, which could occur in 2026.

HGL supports the new WX1 route proposed from late 2023, as it will positively contribute to the connectivity of the west. Development at Redhills will benefit from a reliable and direct connection to the Auckland CBD and its other route stops, particularly following the establishment of routes 116 and 117. This public transport connection has the potential to be a viable alternative to private car usage for commuting from areas of the western parts of Auckland that are not served by the existing rail services.

2.4 Other Comments

HGL considers that Auckland Transport should investigate expansion of AT Local services within greenfield developments prior to full bus services being viable in these areas. AT Local services are considered to be appropriate in these settings as:

- Greenfield developments would not immediately have the population numbers needed to support full-fledged bus services as developments roll out occurs; and
- The ability to provide for standard bus services may be limited by the timing of construction of roads suitable for bus routes and bus stop infrastructure being reliant on several stages of multiple developments often under different developers.

For these reasons, HGL considers that there is opportunity for implementation of AT Local services across Hingaia (including Park Green, Karaka Lakes and Karaka Harbourside) and Redhills, prior to or complementary to the bus services not currently in operation but planned to commence in the 10 year timeframe of the RPTP.

3. Relief Sought

The submitter seeks the following changes to the RPTP before adoption:

1. That for the following public service routes, their timeframes are adjusted as described below:
 - a) Route 377 – The proposed extension to this route is made operational as soon as possible.
 - b) Route 117 – This route is to be made operational as soon as road infrastructure becomes available, which is likely to be at the same time as proposed route 116.
2. That the proposed routes 116, NX2 and WX1 and their rollout timeframes are maintained as proposed.
3. AT Local services are implemented in greenfield developments still undergoing development prior to rollout of full routed bus services, such as within Hingaia (including Park Green, Karaka Lakes and Karaka Harbourside) and Redhills.
4. Any other alternative relief that satisfies the concerns of the submitter.

Motutapu Restoration Trust

August 16, 2023
Motutapu Restoration Trust
PO Box 99 827
Newmarket
Auckland 1149
Auckland Transport
Via email to: rptp@AT.govt.nz

Re: Feedback on Auckland Transport's draft Regional Public Transport Plan (RPTP) 2023-2031
Having reviewed the draft RPTP, the Motutapu Restoration Trust would like to highlight the omission of public transport by ferry to Motutapu, as well as other inner Hauraki Gulf islands. We request that consideration be given subsidising a regular, infrequent service to Home Bay wharf on Motutapu, and that this be added to section 7.4 of the RPTP as an integral exempt ferry service.

Currently very limited transport options exist to access Motutapu. While this is understandable given the commercial imperatives of ferry operators, this severely limits volunteer conservation work and recreational opportunities in the Motutapu conservation estate and recreation reserve, which is an important community asset in close proximity to downtown Auckland.

What we are requesting and why

We would like to request a scheduled ferry service from downtown Auckland via Devonport to Home Bay wharf on Motutapu to be run every second Sunday, departing in the morning around 9am and returning around 4pm.

This service, which could be shared with other Hauraki Gulf Islands or wharfs on Rangitoto, should allow for significant capacity to Home Bay to allow the Motutapu Restoration Trust to run large scale volunteer days (~100 people). This would provide greater opportunities for people to use public transport to engage with conservation volunteering. It would also greatly increase the Trust's ability to carry out conservation work, including weeding and nursery work year round and planting in the winter.

There are currently limited transport options to Motutapu (see background on current and historical access below). Support by AT of a ferry service to Home Bay as an integral service would support the vision for public transport as articulated in the draft RPTP by ensuring access via public transport to this important conservation and recreation estate. As the ferry would leave from downtown Auckland it would have good connections to the rest of the public transport network, opening up conservation volunteering and recreational opportunities to a large catchment. This may also enhance access for Te Motutapu o Taikehu's kaitiaki, iwi Ngai Tai ki Tamaki, who hold mana whenua over the island, and who we work beside to restore the walrua of this sacred place. Provision of ferry services to Motutapu and other islands with similar conservation projects also contributes to the RPTP goal of enhancing the environment, by facilitating the planting of trees and other ecological restoration. This work supports regional and national conservation imperatives and aligns with climate change commitments.

The provision of the requested ferry service on Sundays, perhaps with a further ferry service for example on a Friday, would also provide greater access to Motutapu for recreation. This would increase accessibility to the Home Bay campground to a larger audience than those who have the ability to hike with their camping equipment and food on the three hour walk from Rangitoto.

Background

The Motutapu Restoration Trust is a charitable trust that undertakes ecological restoration on Motutapu in the Hauraki Gulf. In the last 30 years over 500,000 trees have been planted by volunteers, creating a habitat for rare and threatened species including kiwi and takahe which have been released since the island was declared free of mammalian pests in 2011. The Motutapu Restoration Trust's work provides opportunities for people of all ages to engage in and be actively involved in conservation including tree planting, weeding of newly established planting sites and nursery work. Volunteer days are run on a regular basis. Further detail about this ecological restoration project can be found here: <https://site.emrprojectsummaries.org/2017/11/04/the-ecological-restoration-of-te-motu-tapu-a-taikehu-hauraki-gulf-new-zealand/>

Motutapu itself is managed as a public recreation reserve by the Department of Conservation in partnership with Ngāi Tai ki Tāmaki, and provides opportunities for people to engage with the

conservation estate, including walking tracks through regenerating forest and encounters with highly endangered species such as takahe. There is a DoC campground at Home Bay, as well as the historic Reid Homestead which the Motutapu Restoration Trust has restored and runs as a visitor centre for recreational users.

Current and historical ferry access

Currently Motutapu Restoration Trust volunteers working on the island take the ferry to Rangitoto. From there they are collected by Toyota 4WD people movers and driven to the MRT nursery and planting/weeding sites.

This limits the capacity for any work day to 27 volunteers, the maximum number that can fit into the vehicles owned by the Trust. It limits the number of hours of work each day, given the time that is spent driving volunteers across Rangitoto to work sites on Motutapu. There are also limitations due to the fact that the Rangitoto ferry is infrequent (only running Friday/Saturday/Sunday during the 2023 winter planting season) and has often been running at capacity making it difficult for volunteers to obtain tickets.

Historically when ferries did go to Home Bay wharf on Motutapu (a wharf which was actually restored using funds raised by the Motutapu Restoration Trust), the Trust could run volunteer days with 100+ participants, greatly increasing the work completed and the number of people who could engage with conservation volunteering experiences. We are therefore seeking support for a regular, infrequent ferry service to Home Bay wharf on Motutapu being included as an integral service. At a minimum, improvements to the frequency (particularly in winter) and capacity of the Rangitoto ferry would benefit to the Motutapu Restoration Trust's work.

Yours sincerely

Orakei Community Association Incorporated

Vision	
<i>The vision is on the right track but needs some minor changes</i>	It is too open-ended add words "with due regard to business principles of efficiency and cost effectiveness"
Goal 1: Customer experience	
<i>The goal is great as it is</i>	
Goal 2: Environment	
<i>The goal is great as it is</i>	
Goal 3: Accessibility	
<i>The goal is on the right track but needs some minor changes</i>	<p>Either delete the third bullet point or add in ability for all cultures to have access to their cultural sites by public transport.</p> <p>The PPTS allows for demand to be met by services and if there were the demand putting on a service is the appropriate response</p>
Goal 4: Growing Auckland	
<i>The goal is great as it is</i>	NB: No further comments
Goal 5: Funding	
<i>The goal is great as it is</i>	NB: No further comments
Frequent services	
<i>The proposed actions are on the right track but need some minor changes or addition</i>	<p>Bus Route 783 (around Orakei, Mission Bay, Kohimarama, and St Heliers) is not shown in Section 7.5 Services List. It still operates but only hourly and is rarely used and other services cover most of the route so it could be terminated anyway.</p> <p>Flexibility to add to cancel services without appropriate demand, as cancelling services releases assets (buses and drivers) for better use elsewhere. Obvious examples are services to Warkworth and Wellesford which can be serviced by private operators</p>
Travel times	

The proposed actions are on the right track but need some minor changes or additions

We support making PT trips quicker, although we believe that, in most cases, increasing frequency is of greater value than increased speed (if one had to choose between the two). On ferries, we support moves to separate 'side trips' from core routes. For example, we support Birkenhead being a direct service to Downtown (removal of Northcote Point from this route) and propose that Hobsonville Point should also be a direct service to Downtown (without Beach Haven). We would then propose that Northcote Point be a stand-alone service to Downtown (if it can be justified) and that Beachhaven have a shuttle service to Hobsonville (again, if it can be justified).

Cheaper fares

The proposed actions are great as they are

NB: No further comments

Specific routes: Train/CRL: Satisfactory

Airport: AIR from Puhinui works well but service should be increased as demand increases and a dedicated bus lane could be appropriate

Waiheke Ferry: I very much doubt if AT will be able to operate a ferry service-it is specialised. AT is very poor at managing construction contracts. So going outside of core abilities would be a mistake. So NO

General comments on RPTP

It is the ability of AT to execute the goals and policies that worries me

Project Forever Waiheke

Current problems

The initiatives are on the right track but need some minor changes or additions

Re the Waiheke ferry route and service, in addition to AT taking over this service, there need to be specific regulations introduced for (i) required ferry bookings by non-residents of Waiheke for all sailings between 7.00-10.00 am and 4.00-6.00 pm every day, and for all weekend and public holiday sailings, and (ii) a secure allocation of ferry seat numbers for Waiheke residents, based on the known data on averaged resident use, together with (iii) priority boarding on all sailings for Waiheke residents.

Cheaper fares

The proposed actions are on the right track but need some minor changes or additions

It is ESSENTIAL that Waiheke ferry fares are cheaper, and affordable, for Waiheke residents (vs non-residents), so that it is affordable to residents to travel to essential medical and employment requirements.

Specific routes: Waiheke

I strongly support at taking over the Waiheke ferry service, as a matter of urgency, and including regulations for (i) discounted fares for residents and (ii) requirements for advance ferry bookings on all sailings for non-residents. that is the only way that Waiheke residents will be assured of reliable ferry access, given the lack of management of tourist numbers.

Protect Our Gulf

Frequent services	
<i>The proposed actions are on the right track but need some minor changes or additions</i>	<p>Support all actions to increase coverage and frequency. Unless there is sufficient coverage and frequency people are still dependent on other forms of transport.</p> <p>Also, while the target and uptake is commuters, the elderly and young are dependent on public transport and prefer coverage. So it's understanding what these different needs are when routes are rationalised. Parents and the elderly will put up with longer journeys provided they have less distance to walk.</p>
Weather resilience	
<i>The proposed actions are on the right track but need some minor changes or additions</i>	<p>Public transport services need to be concentrated in hubs and managed/organised by Auckland Transport to be effective. Very concerned about the Landings proposal for an additional ferry to Waiheke. The service is unlikely to be sustainable, as it needs a number of ferries to provide a reliable service, compromises and pollutes an additional area of coastline, and is not a transport hub. It is very concerning that a private business opportunity is allowed to set up in a location which serves a limited population. Better opportunities for multiple ferry services need to be provided at existing hubs, including the opportunities for competition, or tendering of services which Auckland Transport deem useful. Are we suggesting that in 10 years time we're expecting demands for private ferry services right around the inner gulf with an addition of pollution, traffic, infrastructure demands. All of this contributes to unnecessary ocean sprawl which was supposed to be managed through sea change and is identified as compromising the gulf in the State of the Gulf Reports since 2017 (from memory).</p>
Low carbon	
<i>The proposed actions are on the right track but need some minor changes or additions</i>	<p>Support electrification but in terms of the transport network support building on existing transport hubs rather than creating additional hubs. Do not support creating additional wharfs and infrastructure for ferries.</p> <p>Given the increase in electrification of the fleet, there needs to be some work done on how to recycle and process old batteries.</p>

Feedback on other RPTP actions

We strongly support the Waiheke ferries to be integrated into PTOM or any other public transport operating model. We are concerned that the services lack resilience and a) the frequency can be changed at the whim of the operators (both Sealink and Fullers).

This has an impact on a population of 12,000 people trying to access Auckland for work, health, family, educational and recreational opportunities. It also affects the potential 1 million visitors.

Until the last year the service has been relatively reliable. This has completely deteriorated in the last year with people leaving 2 hours before a planned appointment and spending upwards of 4 hours in transit in order to ensure they arrive at appointments on time. This is extremely stressful on the community when children arrive late, people arrive late to work and miss appointments. It is also stressful for local businesses which are dependent on tourism as lunches and tours are cancelled.

We are also concerned that the fare structure lacks transparency and is inequitable with other ferry services. Given the fact that the median income of Waiheke is 33% less than Auckland, the fares continue to be unaffordable. This means that people cannot afford to visit family, travel for work, benefit from the recreational opportunities of the city while also paying rates. We feel there should be an outer harbour rate which is provided to all Aucklanders to be able to enjoy Waiheke and for us to access the city. This would benefit the local economy, rather than the current few providers that are supported and advertised by Fullers, the volume of traffic would also ensure that the services were well-utilised. If necessary there could still be a single return rate which visitors could use and would reflect the service as serving the dual use of public transport and visitor service.

The added benefit is that there is currently little visibility of how many users there are of island resources. If this information was collected by AT, it would make it easier for island resource planning.

Really appreciate section 74 and the recognition that Waiheke should be integrated into public transport services.

General comments on RPTP: Multimodal integration

It's obvious that a lot of work has gone into the research and we support increased public transport and multi-modal uses of transport.

As per the previous comments....

AT needs to understand the needs of commuters and the needs of the other core groups (older people and young people) separately. The first group are able-bodied, and probably prefer frequency and are happy to walk some distance on a regular basis as part of their commute. The other need greater coverage so they are walking shorter distances in the dark and with potential mobility issues.

Please fully integrate Waiheke into the public transport model so that AT can manage both pricing and service level.

On Waiheke, the local board submitted for a 40K speedlimit. The signage that is currently out and the system is overly complicated. It makes sense to have a 40 speed limit until Onetangi, and thereafter a 60 speed limit unless otherwise indicated. The only place that could be different is the Onetangi straight with a 50 km sign on it. People should drive to

the conditions and understand that all roads are shared use. The multitude of signs is both confusing and dangerous.

Specifically:

- a) the 50km sign leaving Ostend towards the causeway. This is a 90 degree curve going into a blind corner and completely misleading. Particularly as you're turning into a corner where cyclists are trying to get onto the cycleway and pedestrians are crossing the road to get onto the footpath.
- b) all the signs in Surfdale which keep dropping between 30 and 40ks. It's really confusing and adds to signage pollution.
- c) The share with care signs are really useful. The roads are not wide enough to overtake, there are multiple visitors and children on bikes and people should drive to the conditions. More publicity on driving safely and sharing the road would be more useful than speed signs.

Finally, in terms of climate change, start developing alternative routes for low lying areas affected by flooding. For example if the Tamaki Link cannot operate due to flooding, what is an alternative route that people understand that will kick in in case the primary route is inaccessible. This is just an example.

Protect Our Winters

Policies

In general, we at Protect Our Winters New Zealand find the RPTP proposed policies ambitious and reasonably progressive. We believe that with some attention to detail, and small modifications, you will meet your goals to increase usage and access to public transport, while reducing the emissions of Aucklanders transport as a whole - which is something we can really get behind!

Current problems

The initiatives are on the right track but need some minor changes or additions

Your proposed solutions appear to be valid in response to the urgent issues.

To reduce the time spent checking ID's of students, and the elderly (who receive a lower fare), we suggest to incorporate an affordable flat fee for all members of society. This will speed up bus routes, and make your workers jobs easier.

Frequent services

The proposed actions are on the right track but need some minor changes or additions

Transport services need to include better access on buses and trains for bikes, to allow more Aucklanders to integrate biking with public transit. Especially on rapid and frequent services. Bike lanes should be connected to public transport hubs, with the possibility to take bikes on to buses, trains, etc available.

Travel times

The proposed actions are on the right track but need some minor changes or additions

The proposed actions don't include enough rapid/frequent services with feeder services, in Kapiatiki or Devonport peninsula. These areas are experiencing rapid infill (housing densification) and require expanded PT services, as well as better protected bike lanes to allow better access to the nearest rapid PT services

Cheaper fares

The proposed actions are on the right track but need some minor changes or additions

A reduced daily fare cap (e.g., substantially lower than the existing \$20) would also help encourage ridership, by improving the cost of PT relative to a personal car and parking.

A low price fare for all PT users would speed up transit times due to avoiding PT workers needing to check people's student ID's etc for those receiving reduced fares.

Communications and technology

The proposed actions are on the right track but need some minor changes or additions

We support the digitisation and simplification of the RTPT. We have community members living in Switzerland. They do not need to own cars because the public transport system is excellent. One member stated the best thing about the SBB (the Swiss transport network) are as follows:

- The SBB mobile app works for all public transport, from buses, trains, to gondolas in ski resorts that are considered part of public transport
- You can set up a credit card easily on your account, easing the ticket booking process
- Tickets can be purchased on the app in seconds (once card is connected)
- There is real time information about any delays
- They have a swipe function that allows you to turn on charging your account as you step on the train, and it automatically switches off as you step off the train
- They have live chat for any ticketing issues to be resolved quickly
- Users can purchase an annual abonnement (to use any PT, any time, for free)
- Users can purchase an annual demi-tarif (which makes all PT fares half price), this costs only CHF 160
- They have spaces for bikes, skis, and other sports equipment
- They offer supersaver tickets which decrease congestion by incentivising people to travel outside of busy commuting hours
- They offer a reduced daily cap on travel fares when a user is taking many transports in one day

Weather resilience

The proposed actions are on the right track but need some minor changes or additions

Valid responses, we encourage planting of trees and plants around new and existing infrastructure, to fall in line with spongy city design, which has improved resilience for flood water drainage.

Low carbon

The proposed actions are great as they are

Great proposals. Especially support ferry electrification for busy routes as this has a huge bang-for-buck to

reduce emissions, and the largest co-benefits for reduced noise, reduced air pollution etc.

General comments on improving PT

We noted that the highest users of PT use the services for their transport to and from work and education. We represent Protect Our Winters, a community of avid sports people who love all outdoor sports from skiing, to surfing and biking - just to name a few. By enabling users to bring their surfboards and bikes onto buses and trains, and by providing better connections to recreation areas, you will decrease their reliance on personal vehicles for transport, and therefore encourage Aucklanders to embrace PT not just for commuting, but in a wholesale manner for all aspects of life including sports and leisure. This will allow people to live without cars, and decrease congestion issues in Auckland.

Additionally, we support the digitisation and simplification of the RTPT. We have community members living without cars in Switzerland who stated the best thing about the SBB (the Swiss transport network) are as follows:

- The SBB mobile app works for all public transport, from buses, trains, to gondolas in ski resorts that are considered part of public transport
- You can set up a credit card easily on your account, easing the ticket booking process
- Tickets can be purchased on the app in seconds (once card is connected)
- There is real time information about any delays
- They have a swipe function that allows you to turn on charging your account as you step on the train, and it automatically switches off as you step off the train
- They have live chat for any ticketing issues to be resolved quickly
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- They have spaces for bikes, skis, and other sports equipment
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- They offer a reduced daily cap on travel fares when a user is taking many transports in one day



Pukekohe Christian School

General comments on improving PT

As a school on the boundary of the township of Pukekohe, we would love to have more public transport options to the gate which would prevent the congestion we experience on a daily basis. Numbers of families choosing independent schools are increasing across the area and we can see this trend bringing us many families from the outskirts of Franklin. It would be great to be able to advise families of the public transport options that could serve our school setting, and our families. This would also reinforce the messages we are teaching about sustainable transport options for our young people.

Takapuna Residents Association

Current problems

The initiatives are on the right track but need some minor changes or additions

NB: No further comments

Frequent services

The proposed actions are on the right track but need some minor changes or additions

We note that the #82 bus provides excellent connectivity to Wynyard Quarter and University. The #83 bus connectivity to Smales Farm and further West and North.

A major impediment is the poor access to Downtown and Britomart through the Fanshawe transit point heading into the city. The delay in transit, weather exposure and even lack of understanding deter people using public transport to other parts of Auckland.

Feedback on other RPTP actions: Upgrade Takapuna bus station

Takapuna is one of the busiest bus stations in Auckland, but the current facilities are looking tired, poorly lit and unappealing.

We note that an upgraded bus station is part of the Eke Panuku project in Northcote. Panuku should be including the bus station as part of the Takapuna project.

Introduce a 'Takapuna Link' branded bus

Other high density residential and commercial areas have branded Link buses e.g. Newmarket, Parnell, St Lukes, Mt Albert, Glen Innes. Having a high frequency unscheduled connection would make Takapuna more accessible. Ideally, this bus would run from Britomart, Esmonde, through Takapuna to Milford and then onto Smales Farm, providing easy connection to both North and South Auckland for a significant population. The current #82 could be extended to Smales Farm.

Te Tai-awa o te Ora

Vision	
<i>The vision is great as it is</i>	includes all the main points I think are important
Goal 1: Customer experience	
<i>The goal is great as it is</i>	If customer experience doesn't improve there won't be increased use
Goal 2: Environment	
<i>The goal is great as it is</i>	I don't know enough about this topic to suggest changes
Goal 3: Accessibility	
<i>The goal is great as it is</i>	Equity is a very high priority for me, especially in relation to Maori
Goal 4: Growing Auckland	
<i>The goal is great as it is</i>	Infrastructure needed to support past growth has been woefully neglected - and now we are facing further growth which will make it worse
Goal 5: Funding	
<i>The goal is great as it is</i>	I can't think of any missing components; I think excellent to recognise how public transport can support Maori identity and outcomes

Te Whakahaere Āhuarangi Ltd

Vision	
<i>The vision is on the right track but needs some minor changes</i>	<p>Need to provide bicycle access and safety to all destinations. Every road/street should have a designated and separate bicycle lane, including across the harbour.</p> <p>Need to provide adequate parking at transport hubs. No point in having services when people can't access them or end up getting parking tickets because the parking is full by 6.30 am.</p> <p>Provide plenty of EV slow charging at all hubs (not just one or two).</p>
Goal 1: Customer experience	
<i>The goal is on the right track but needs some minor changes</i>	No point in having abundant services if people can find parking at hubs. This is one of the most essential parts of the customer experience.
Goal 2: Environment	
<i>The goal is on the right track but needs some minor changes</i>	This is all good to say but unless the targets are ambitious and actual reduce emission then it's simply greenwashing. AT needs a gross emission target not a net emissions target and that target should be 0 by 2030.
Goal 3: Accessibility	
<i>The goal is on the right track but needs some minor changes</i>	Again, accessible also includes having sufficient parking all day, wither car parks full up and commuters end of being discouraged by parking fines.
Goal 4: Growing Auckland	
<i>The goal is on the right track but needs some minor changes</i>	All development should provide public transport and bicycle access to transport hubs. This should be a condition of development approvals.
Goal 5: Funding	
<i>The goal is on the right track but needs some minor changes</i>	Public transport, as a public service, should be free. Efficiency should be measured in terms of the fare cost, ie, the cost to users, as well.
Policies	

All the policies appear aspirational with no accountability. A policy is a set of rules or guidelines that are established to govern a particular area of activity. It is a statement of intent that outlines what an organisation hopes to achieve and how it plans to do so. A policy must hold decision makers to account and is not just an aspirational statement. It should be clear, concise, and measurable, with specific goals and objectives that can be tracked and evaluated over time. This helps ensure that the policy is effective and that those responsible for implementing it are held accountable for their actions. These AT policies fail to meet these criteria.

Current problems

The proposed actions are great as they are

They aim to increase services, increase efficiency, increase emissions reductions and work with drivers. All good solutions.

Frequent services

The proposed actions are on the right track but need some minor changes or additions

No enough, in fact no, focus on bicycle usage. This should be a priority. People living in urban areas should be able to do without a private vehicle other than a bicycle. This is standard in most modern cities.

Travel times

The proposed actions are on the right track but need some minor changes or additions

Great but again, where is the focus on bicycle usage?

Cheaper fares

The proposed actions are on the right track but need some minor changes or additions

Public transport should be free. People using public transport are general on route to spend, earn an income, or learn how to earn an income. They should be encouraged to do this as the longer benefit means more spending.

Communications and technology

The proposed actions are great as they are

Accessibility needs

The proposed actions are on the right track but need some minor changes or additions

As long as announcements and messaging includes in te reo Māori.

Safer public transport

The proposed actions are on the right track but need some minor changes or additions

Transport has to be save for drivers as well. There should be noise and disturbance restrictions so people that cause discomfort for other riders should be removed from the service. Drivers need to be supported so that can enforce this.

Weather resilience

The proposed actions are on the right track but need some minor changes or additions

Good, but emissions are the cause of the problem so AT should be targeting gross zero emissions by 2030.

Low carbon

The proposed actions are on the right track but need some minor changes or additions

Good but it should be 100% zero emissions fleet and 100% electric or hydrogen.

Feedback on other RPTP actions

These are aspirations not actions. Set some tangible targets against which the directors are accountable. Yes, you missed bicycles.

Specific routes

There should be every increasing light rail availability to all parts of the region including parks and beaches.

General comments on RPTP

There are a lot of aspirational statements and a long and meaningless document. A simple list of actions, real actions against which directors are held accountable, would be more useful and meaningful. It looks like a lot of money and time spent to further cloud the issues, delay action and avoid responsibility. I have no confidence that it will deliver anything meaningful.

General comments to improve PT

Eliminate emissions, provide services to all residents to all destinations (work or leisure) and eliminate the need for private transport. If other modern cities can do this then, with our population, it must surely only be incompetence that prevents it happening in Auckland.

Titirangi Residents & Ratepayers Association

Submission by the Titirangi Residents & Ratepayers Association on
Auckland's Draft Regional Public Transport Plan 2023-2031
16 August 2023

From: Titirangi Residents & Ratepayers Association
Contact: Dr Mels Barton, Chair
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1. Introduction

1.1. Thank you for the opportunity to present the Titirangi Residents & Ratepayers Association's submission on Auckland's Draft Regional Public Transport Plan 2023-2031.

1.2. This submission is made by The Titirangi Residents and Ratepayers Association, a non-profit incorporated society formed in 1987 to promote and represent the interests of ratepayers and residents in the Titirangi area. The Association can be traced back to the 1920s when an unincorporated society is recorded as lobbying Council regarding roads.

1.3. We wish to speak to our submission if that opportunity is provided.

2. Submission

2.1. We are in strong support of some of the key statements and themes in this draft plan. We particularly support the aim of greatly reducing transport emissions in the vehicle fleets and through a substantial shift to public transport from private car use.

2.2. We also support all efforts to enable people to access public transport, particularly through the use of active transport modes (walking, biking), but also by car if no other option exists.

Vision:

2.3. In the Vision Statement 3.1 we support the aim to 'Massively increase public transport use' and action to enable this.

2.4. In the prominent vision statement four outcomes are stated: to reduce congestion, improve access for Aucklanders, support the economy and enhance the environment. We strongly support the main goal, but the outcomes seem arbitrary and the plan doesn't support them.

Addressing the driver shortage crisis:

2.5. AT responded to the recent driver shortage crisis by cancelling services; the network reportedly became chaotic and bus patronage fell off dramatically. The draft plan claims that you are improving terms of employment, yet at end July it was reported that the recent 'pay hike takes the hourly rate for bus drivers from an average of \$23.71 to \$25.62'. By September, this rate will be below the Living Wage. Your website also claims, 'We believe in an Aotearoa New Zealand where everyone is paid fairly regardless of ethnicity, gender or ability', yet - even though your plan is peppered with altruistic affirmations about genuine partnerships with mana whenua and so on - your pay equity gaps are 25.3% for Māori and 23.3% for Pasifika. When you are accountable for delivering a reliable, essential service, bewail driver shortage when you're unable to do so, fall short in efforts to improve employment terms, yet pay the CEO over \$600,000 a year, these contradictions are visible to Aucklanders. AT needs to take steps to prove that it deserves to regain public trust. We consider that you should as a minimum be paying a Living Wage to all your staff and contractors. No exceptions.

Frequency and reliability:

2.6. For mid-2023–end 2024, you say your priority is to 'address urgent concerns for reliability and recouping patronage'. Your customers have suffered a lot due to service unreliability, with the media reporting horror stories of people waiting hours trying to get to work. In service delivery, certain basic levels of quality have to be in place. Customers tell you that reliability is the Number 1 improvement you can make, and we agree. It is very important for your plan to show very clearly exactly how you will deliver this, not just in terms of aspirations.

2.7. We also support more frequent services at peak times, but only if several buses are not going to reach a stop at the same time because of traffic delays, or if high

volumes of passengers use a route then are left stranded by cancelled services. We strongly suggest AT address reliability in a convincing way before attempting increased frequency. As it stands, the plan depicts an effort to increase everything at once, which doesn't inspire confidence. ('Long-term focus and aspiration is for PT use to increase significantly for a wider range of trips. This means higher frequency and reliability of services as well as quicker travel times') What is urgently needed is careful, structured, intelligent interventions to make the network run better and more efficiently.

2.8. The only things we see in your plan that could possibly improve bus service reliability is firstly to attract enough drivers to work for you, and secondly, 'Network Optimisation' - the small scale interventions that improve traffic flow, e.g, optimising traffic lights, dynamic lanes, bus lanes/ transit lanes, bus intersection queue-jumps, etc. You report that 'signal pre-emption' trials on Manukau and Pah Rds resulted in 10-35% less wait time at intersections for late-running buses. If this is so, then you need to tell us where and when you are going to implement this and the results you expect. Reliability is essential, and we would have liked to see a lot more hard detail about how you are going to deliver this.

Communications:

2.9. It is intolerable for passengers simply not to be told about delays and cancellations. Customers have told you that as well as a fast, frequent, reliable, convenient, safe PT system, they want information and communication to be easy to access and understand, and that you advise changes or disruptions to services quickly and clearly. It was widely reported that when services fell apart, not even the simplest forms of communication such as paper signs or a hand held loudhailer were used to tell passengers what was going on. People waited in vain for services that didn't arrive, even though this was known, and should have been conveyed without fail. People are not asking for rocket science levels of sophistication – merely basic information conveyed in a reliable way using idiot-proof systems.

2.10. Yet once again, in the plan, you seem to go over the top and over-promise indiscriminately. You decide to enable people to 'access public transport services information to help plan journeys anywhere, anytime: onboard, at a stop or station, home, school, work or out and about.' You state that 'This goal ... will involve infrastructure upgrades ... introducing new bus routes, more frequent existing services, upgrading our ferry fleet and better frequency and ferry network connectivity, new train stations, and continuing to trial and introduce our AT Local on-demand service. It also means improving customer experience and digital channels, including the AT Mobile app.' Again, how all this flurry of activity and expense is going to achieve the specific basic improvement in communication that is so much needed, is really obscure to us.

Encouraging active modes:

2.11. We strongly support your proposals to improve passenger experience for the 'first and last legs', i.e. their ability to reach PT, and their destination after alighting, in a manner that is 'safe, convenient, pleasant and fully accessible, whether on foot, a bike or scooter, or in a car'. We take this to mean that people can drive, walk or cycle easily to and from a bus or train, and that while on it, they have somewhere to put their bike or car.

Bikes and public transport:

2.12. For bikes to serve as the first and last legs, secure cycle parks/storage are needed at all rail/bus stations and in every Park and Ride area, and we're glad to see that this has been implemented widely. It is important that people know this. However, finding out from your website would involve the luck of the draw. This page [cycling-walking/bike-parking-security/bike-parking-and-gear-storage/](#) (if one happens to land on it) sets out all the details:, while this one [cycling-walking/bike-parking-security/](#) tells a quite different story, citing only two rail stations with bike parking, and bike racks at the Northern Busway stations only, with an illegible map. 'Auditing' your website for contradictions is a top priority.

2.13. There is very little opportunity to take (non collapsible) bikes on Auckland buses. At most, a few buses can carry just two bikes on a front rack. We encourage AT to be more ambitious and consider what others do. Small scale investments can have a big, cumulative effect to convert passengers to active modes rather than driving to

the bus or train (or just giving up and driving).

The RPTP's relationship with the Transport Emissions Reduction Plan (TERP):

2.14. Among the overarching, core strategic guidance sources for this draft, there is a glaring omission. In the Figure 1 graphic depicting the Auckland Transport Strategic Planning Framework on the first page, eight local and central government plans and policies are shown: the Auckland Plan, the Long Term Plan, the Auckland Transport Alignment Project, the Auckland Regional Transport Plan and others. The critical omission is the Transport Emissions Reduction Plan (TERP).

2.15. The omission of the TERP from the strategic planning framework is 'glaring' because on Auckland Council's own website, the clear statement is made (emphasis added) that: 'The TERP provides formal direction that Auckland Council and Auckland Transport must follow in all of their activities. This includes updates of key planning and funding documents such as:

- the Auckland Transport Alignment Project (ATAP)
- the Regional Land Transport Plan (RLTP).'

2.16. AT's plan describes how, in the funding framework 'The RLTP turns this agreement (the ATAP) into a 10-year investment plan and how it will be delivered and translated to services, infrastructure and supporting elements'. Yet the ATAP is not the kingpin here, it is the TERP.

2.17. The TERP states that 'the TERP provides direction that Auckland Council and Auckland Transport must incorporate into future ATAP, RLTP and LTP processes'. We see that public transport funding is aligned to the ATAP, yet takes no account of the investment implications of the TERP. This needs to be highlighted and addressed. Whoever is sidestepping the intent of the TERP here, AT is itself clearly obligated; it can't shelter passively behind AC and governments' failure to deliver.

2.18. The TERP is a clear, ambitious and important plan that sets out the imperatives for transport emissions reduction unequivocally. Among other statements, it affirms that:

2.18.1. "AKL needs to reduce transport emissions by 64% over the next eight years to be consistent with international agreements to urgently address the need to reduce GHG emissions. This goal was supported unanimously by the Mayor, all Councillors, members of the Independent Māori Statutory Board and all local boards . . .

2.18.2. Right now, only 17% of trips are made by walking, cycling or PT ... this needs to increase to at least 62%. (Note: This is a moderate goal. The Climate Change Commission states that the average distance per person that is travelled by walking, cycling and public transport can be increased by 25%, 95% and 120% respectively by 2030.)

2.18.3. This has to be supported by additional initiatives such as potential subsidies and discounts for more sustainable travel modes.

2.18.4. To achieve the 64% (on 2016) target, transport emissions must reduce from their current (2019) levels of around 4.9Mt CO₂e to around 1.75 Mt CO₂e in 2030.

2.18.5. Operational emissions, including fixed assets/trains reduce by 50% by 2030 (2019 baseline).

2.18.6. The reality is that the 64% target requires every single lever across the system to be pulled as far as is credibly possible.

2.18.7. The 11th transformation area – Empower Aucklanders to make low carbon choices– underpins all other transformation areas"

2.19. Yet the RPTP does not commit to the TERP. Rather, it asserts (emphasis added) that:

2.19.1. AT will be working towards the goals set by AC in the TERP within our available funding

2.19.2. Estimated impacts from our programme are expected to be modest in reducing emissions in comparison to the scale of the TERP goals.

Nevertheless ... we will strive to make progress towards the TERP's targets within our available funding ...

2.20. You state repeatedly in the draft how funding limitations will prevent you achieving the TERP goals. However, AT has no leeway to simply renege on these goals. The TERP supports New Zealand's obligations under international law, which AC is obliged to deliver. AT cannot simply lament and wilt in face of them. AT's approach should not be feeble: it is by far the most powerful agency delivering transport

services and infrastructure in New Zealand apart from Waka Kotahi. Complaining about funding in the pages of a consultation draft is really not befitting to an organisation of AT's status. Rather, AT needs to present a powerful and influential case to Council and central government, using all the leverage at its disposal.

2.21. However, there is a small caveat here: how much of AT's current funding is being spent on 'high carbon' activities, such as developing roads to carry more traffic and general roading structure upgrades, and whether a different planning emphasis could enable the emissions reduction goals. For the Botany Road intersection upgrades, for example, the public gave only minority support for the project public-feedback-report-botany-rd-intersection-upgrades, and the massive bulk of concerns were about the effect on cyclists. Aucklanders deserve to know that AT is in fact basing its spending focus on confidence in what PT and active modes can deliver. If after all efforts are expended, there is not enough money provided to deliver a high quality, low emissions public transport system, then AT surely has a case to make, and needs to make it.

2.22. In respect of the hard goals set by the TERP, these are set for 2030 against baselines of 2016 for emissions reductions and 2019 for assets/trains. However, the RPTP sets goals for 2031 against a 2021 baseline. We cannot understand why AT has chosen a different baseline and a different target date. This makes it impossible to evaluate whether AT's goals are high or low. Further, the TERP is full of models and charts on projected emissions levels and how these may be achieved. There are no such charts and models included in the RLTP related to emissions. If AT has the modelling, it needs to display it. If not, it needs to do the modelling.

Lack of costing information:

2.23. Also, in the RPTP, there is no costing information at all around the lists of AT's ambitious goals (Improve all-day frequency on frequent routes from every 15 mins to every 10; add more routes to the frequent network; significantly expand the RTN, etc). The public needs to understand how much it would cost to bring our public transport network up to the level needed, not simply that AT deems this to be unaffordable with its current funding.

Reduce congestion:

2.24. While of course, increased PT use can do this, the plan does not in fact mention it. 'Congestion' only appears in the plan in the context of congestion charging (a central government initiative) and how RTNs and FTNs can avoid being hampered by congestion. Yet AT presumably has volumes of research and data to hand. We wonder why we see no modelling around the expected impacts on traffic volumes of given levels of PT provision, particularly on the Rapid Transit Networks (RTNs) and Frequent Transport Networks (FTNs).

Improve access for Aucklanders:

2.25. We assume this means access to public transport.

Park and Ride:

2.25.1. Your customers say poor access to and from PT is one of the top reasons they don't use it more, and you mention park and ride in this context. We strongly support park and ride, and agree that spaces should be reserved for PT passengers only.

2.25.2. In this plan though, there is no detail about what is provided and planned. Rather, readers are directed to the separate document, 'Room to Move': this almost impenetrable PDF (in a tiny font; in landscape; only a fraction of each page can be read at once) only contains about a paragraph on park and ride. We wonder why you didn't just include information in the plan itself.

2.25.3. We are glad to see in 'Room to Move' that AT will apply 'Continued strong use of off-street parking and park and ride facilities', and the Policy statement that 'Park and Ride facilities are provided and managed in locations where they improve access to the public transport network . . . and make a meaningful contribution to congestion reduction'. However, the RPTP draft is quite circumspect about increasing park and ride, mentioning mainly how expensive it is.

2.25.4. We read that 'Park and rides across Auckland are at or approaching capacity. In some circumstances this is leading to overflow parking in adjacent streets. While there is scope for some expansion at key sites, resources are limited.

Going forward, park and ride capacity and demand will be influenced to be better matched and better aligned to strategic outcomes'. It is very unclear what the words in italics mean. Park and ride is essential for many people to patronise public transport at all. We strongly suggest that AT look more deeply at this area and do some modelling around what the demand actually is, and the cost-benefit of meeting this.

PT provision:

2.26. In the Waitākere Ranges Heritage area, many people are poorly served by PT and some have no access at all. Residents and elected reps have submitted actively to AT on this for years, yet no serious needs analysis or consultation have taken place. For most communities west of Titirangi, accessing the PT network will involve a round trip by car of at least 20-30km, and up to 60km. Titirangi has access to the bus, but parking is extremely limited. We are sure this situation can be addressed, and shuttle buses have often been suggested.

2.27. Yet, we are very disappointed to see that AT has no intention to address this. The map of the proposed transport network in 2031 shows that in eight years' time, there will still be no public transport for the Ranges west of Titirangi, except for the same little local 171 bus that services Laingholm. (To the north, we also see no offering of rapid transport beyond Westgate, i.e. to the populations of Riverhead, Kumeu, Huapai, Waimauku or Helensville.)

2.28. The absence of public transport needs to be addressed for the Waitākere Ranges in a creative, appropriate way. It is not acceptable to relegate this to low priority because the population is small. AT's goal is to 'improve access for Aucklanders', not, 'improve access for Aucklanders who live in dense residential areas'.

Support the Economy:

2.29. While this is a key outcome of your vision, the RPTP says nothing at all about how PT will support the economy. Obviously, some people need PT for work and education, but we don't think AT considered this outcome very seriously before including it.

Enhance the Environment:

2.30. We are very interested in how AT intends to do this through public transport. Climate, environment, biodiversity and so on all do seem to be somewhat mixed up in the plan, and we wonder if AT is seeing climate change as an 'environmental' threat and mistaking emissions reduction for environmental enhancement. Also, the phrase 'Climate adaptation and restoring our natural environment' appears four times, though the two are not related at all. We are glad that climate adaptation is included, but details are missing. Aucklanders need assurances that charging facilities for AT's electric fleets will be made resilient along with digital communications systems in the case of power outages, what is proposed for low-lying FT or RT routes (such as the northern motorway) and so on.

2.31. However, these have nothing to do with enhancing the environment, and we see nothing tangible in the plan on how AT will enhance or restore the environment.

There are some very aspirational statements, but they are not linked to actions. These include 'Our aim is to protect and restore biodiversity, water, air quality and ensure resource efficiency at our PT facilities', and 'Ensure new infrastructure seeks to protect and restore the environment and biodiversity'. We agree that emissions reductions will affect air and some water quality, but in the absence of very strong supporting detail, claims that infrastructure will restore biodiversity must be seen as quite far-fetched. Elsewhere we see that, 'AT is dedicated to working with mana whenua partners and mataawaka individuals and communities, to ... protect and restore our natural environment'. This looks very wonderful, and we envisage bus drivers spending weekends planting trees, but this is not credible if no detail is provided.

2.32. Generally we suggest that AT considers more thoroughly what its aims really are, and what outcomes it is going to target. Unless the plan is properly lined up around a strategic framework, it is not going to help direct action in an aligned, effective way toward the right priorities. Activity that is not aligned wastes resources, and impedes our progress toward goals that are critical.

The Future Auckland Train Network:

2.33. We are very much looking forward to the opening of the CRL and the opportunities

this will bring for those who can access stations at Henderson, Swanson, Glen Eden and New Lynn, with the caveats above about ensuring that 'first and last leg' access is properly supported.

On Demand and Shared Mobility:

2.34. We see great potential in these schemes, though there is no clear description of what they could look like. We note the goal to 'Establish Working Groups with community groups for the provision of on-demand transport or other transport solutions', but hope that this is not a bid to transfer the load onto the community. As it stands, we only see e-bikes provision, and that 'shared mobility' means local people organising ride-sharing.

2.35. We wonder if AT may be in a cleft stick here, as any capacity AT puts into this won't help with revenue targets. Yet initiatives here could contribute significantly to reducing congestion and emissions, and helping people access PT. We would like to see a senior position created to stimulate projects here, with publicity and calls for collaboration from various sectors.

Ferries:

2.36. We strongly support low-emissions water transport and any means by which this can be expanded, providing that due care is paid to protecting the marine environment. The new low-emissions ferry fleet expected in 2024 is a great addition.

Relationships inside and outside AT:

2.37. We see reports that AT staff have been demotivated by the public perception of the service, and we are not surprised. For many people, perception of AT is damaged by the quality of its community liaison, which in some areas has varied between unresponsive and hostile. Yet this belies the value of many wonderful frontline staff working at 'the coal face', and levels of service-orientation (e.g. bus drivers' actions to get people to work in the floods) that are simply heroic. Organisational culture is not an accident: mainly it emanates from the top of the organisation, either through top people's attitudes to those below, or where inept planning and resourcing makes frontline workers' jobs untenable. Where these elements are not addressed, AT will consistently struggle to attract staff and recoup patronage. We are encouraged by the action area, 'More transparent and meaningful engagement with Local Boards'. This is very important, and it needs to be genuine.

Public transport and land use integration:

2.38. The AC Future Development Strategy includes many 'future urban' areas that are not viable unless served by public transport. We support AT's actions to 'work with AC and developers for the provision of new PT services in areas with new housing developments . . . to work with consenting authorities and private and public sector developers to ensure new road layouts and urban form in new developments enables a direct and efficient PT service'. This work needs to be proactive and energetic.

Māori outcomes:

2.39. We note that 'Auckland Transport is dedicated to working with mana whenua partners and mataawaka individuals and communities, to improve the lives of whānau, hapū and iwi Māori'. Section 3.7 re-states this aspiration at some length. We've seen such claims, Te Tiriti commitments and so forth, in council plans in recent years and have come to view these with some reserve. If AT is genuine here, then statements such as these need to be endorsed by mana whenua. It is easy to make these statements while delivering nothing except a few names and some communication in Te Reo Māori, and using décor and designs that suggest a Māori influence. If AT claims to serve Māori, then Māori need to state that they feel served, and in what ways, and this needs to be part of your monitoring activity, and reported publicly.

Anomalies and shortfalls in the plan:

2.40. In reviewing the plan, we found the main obstacle to be the way that core themes were scattered around the document rather than being used as the structure of the document. It would be very helpful to have a plan first identify the key strategic goals and then have a series of sections explaining how each is to be achieved. As it is, we invariably have to find content relating to topics and themes by doing word searches.

2.40.1. Again, PDF was used as the format – the least user-friendly, navigable and convenient of all.

2.40.2. As we usually find, the document was much longer than it needed to be,

because of repetition (the same statements made numerous times in slightly different ways), and longwinded wording. If repetition were removed from the plans of Auckland Council and its whanau, and authors wrote simple, concise English, we believe these plans could be at least 30-50% shorter. We only need to see a statement once for it to land. There are no extra marks for length: in fact the converse is the case: it is so appreciated when authors can avoid taking a whole paragraph to make a simple statement.

2.40.3. Also, as we often find, we encountered many words and phrases that were incomprehensible because they are in jargon or contain buzzwords, or because they are simply incomprehensible. We faced challenges with the the following (examples only): adverse equity impacts, headway management approach; dynamic-routing services; customer-facing technology solutions; a First and Final Leg single-stage business case study to identify a delivery-focused programme of staged interventions across the RT network; bus stop spacing that balances travel times for services. For AT to be accessible to the public, it needs to communicate in ways we can understand.

2.40.4. In the actions summary for 'Rapid and frequent infrastructure and services', 'Invest in upgrades to the heavy rail network' is mentioned both as a short term and an aspirational intent.

Waiheke United AFC

Specific routes

Waiheke United would like to understand the impact this would have on the football club and the current arrangements we have with Fullers in regards supporting the club with ferry tickets and reduced travel costs.

Currently the Ferry costs are a huge barrier to participation for the local community and i suspect this is not only applicable to the football club. This effects a wide variety of age groups from children to the senior players, participating ion NRFL competitions as well as social. The club would like to understand how AT will prior support for sporting activities off the island as well as team coming to the island.

Waiuku Business & Development Association

Frequent services

The proposed actions are on the right track but need some minor changes or additions

We desperately need more frequent bus services from Waiuku to Pukekohe so the upgrade will be well received particularly with the return of the train service from Pukekohe to Auckland, however 2026 is too far away, particularly with the current growth taking place in the Waiuku area. The current service of only one bus every 2 hours, is perceived by the community that our town is not viewed as important. We have no bus shelters in Waiuku. Shelters are required at all bus stops to encourage people to use the service more often and to make it easier for elderly people or those with limited mobility who need to sit down in the shelter. The bus stop 2921 on Kitchener Rd, Waiuku is in a dangerous and impractical location on the main route into the town. Traffic is unable to get past when a bus is at the stop, due to a traffic island. This bus stop needs to be re-located to a suitable location.

Accessibility needs

The proposed actions are on the right track but need some minor changes or additions

Waiuku has no Bus shelters and this is a main priority for basic infrastructure and accessibility, along with seating for people with any kind of impairment and for elderly passengers.

Weather resilience

The proposed actions are on the right track but need some minor changes or additions

There are no Bus shelters in Waiuku, and due to the frequency of severe weather events in 2023, they are needed urgently. I think areas which do not have the infrastructure should be the first priority, followed by the retro-fit of existing infrastructure.



Wentworth College

Specific routes: Gulf Harbour ferry

We, the undersigned (NB: 107 students signed the petition), are concerned Wentworth college students who oppose the removal of Gulf Harbour ferry service in 2028.

Weymouth Residents and Ratepayers Inc

Vision

The vision is great as it is

Public transport is the key to reducing travel times and congestion. It can also help reduce travel costs. But it needs massive improvement otherwise many people cannot use it because it requires full mobility on the part of the user. Many people cannot walk properly to ad from bus stops or rain stations. These people are currently left out of the public transport system.

Goal 1: Customer experience

The goal is great as it is

Current services are infrequent and unreliable. They are particularly difficult for blind people.

Goal 2: Environment

The goal is great as it is

Biodiversity, water, and air quality are all important elements of our environment. Annually there is degradation of all three elements.

Goal 3: Accessibility

The goal is great as it is

People with disabilities need greater consideration. Many such people cannot use the services as of now.

Goal 4: Growing Auckland

The goal is great as it is

Transport nodes are integral to good, efficient community function. transport acts like blood moving through the body of the community, delivering people as and where they need to be.

Goal 5: Funding

The goal is on the right track but needs some minor changes

There is an over-emphasis on the needs of Māori. We are a multi-ethnic society now. Māori needs and outcomes must be a consideration but, equally, so must the needs of all other ethnic groups.

Policies

Lovely objectives ad principles. In my experience these things are all talk and no action. AT already has a policy of not listening properly to communities. Arrogant disregard even. What about this makes me think these policies will actually matter in practice. Nothing.

Travel times

The proposed actions need significant changes

You have introduced 30km speed zones that slow traffic down and increase travel times by 66%. The new speeds also add to traffic congestion. With stupid decisions like these why would I think that AT is ever going to be able to achieve these goals.

Feedback on other RPTP actions

There is insufficient consideration of road and footpath design and how this integrates with transport needs. The Dutch model whereby bicycles are given full consideration needs to influence our road and footpath design more strongly. It may also be that road design changes are required to accommodate bus stops to improve passenger safety. Currently bus stops are "plonked" beside busy roads where buses are the least of considerations.

Specific routes: trains

Oh, you do actually propose to have trains do you?! Our southern lines will be out of action for up to 2 years and effectively there will be no train service. This could have been managed better with more thought to train users than has been given.

Specific routes: Waiheke

Good idea.

Specific routes: Other

There is no thought given to Manurewa and Papakura services, nor anything south of Botany. I regard this as a continuation of decades of neglect for South Auckland needs and requirements. Planners simply do not value South Auckland highly enough in its considerations for change and improvement.

General comments on RPTP

A pipe dream.

General comments on improving PT

Stop talking at communities and start talking to communities. Advertising is not consultation. AT advertises changes rather than consulting with communities about changes. The introduction of a 30kph speed limit in Weymouth is an example of this lack of consultation. It is an unwanted and unwarranted change to our community that will inevitably lead to a system of fines and revenue gathering from a poor community.