



**THE NEW ZEALAND
AUTOMOBILE
ASSOCIATION
INCORPORATED.**

Level 16
99 Albert Street
Auckland 1010
PO Box 5
Auckland 1140
New Zealand

T:+ 021 757 238
E: mglynn@aa.co.nz
W: aa.co.nz

Proposed City Centre Bus Plan
Auckland Transport
ATengagement@at.govt.nz

22 October 2021

Submission from the NZ Automobile Association on the proposed City Centre Bus Plan

Introduction

The NZ Automobile Association (AA) appreciates the opportunity to submit on Auckland Transport's (AT) proposed City Centre Bus Plan (the Bus Plan).

The AA represents 335,000 Auckland motorists. Our Members are frequent visitors to Auckland's city centre. A recent survey found that over 50 percent go into the city centre at least once a month and just over 20% most days of the week. As well as motorists, AA Members are pedestrians, cyclists and public transport users too, with 17% reporting that they use public transport regularly, and 9% identifying themselves as regular cyclists.

The AA has previously signalled our broad support for Access for Everyone and have noted that it aligns well with the vision that AA Members and the majority of Aucklanders have for our city.

We also appreciate the critical role buses provide as the main public transport mode into the city centre. It is easy to lose sight of this fact given the recent and current focus on the Downtown Ferry Terminal, the City Rail Link and light rail plans so it is great to see AT recognising the need to plan and provide for growth in bus demand.

We support the overall direction of the Bus Plan. Our main concerns relate to:

- the need to address adverse traffic impacts on the Central Motorway Junction and wider motorway network
- the absence of a plan to address the impact of the changes on general traffic in the city centre and
- the optimal capital investment timing facilities and
- value for money from constructing up to six bus facilities in the city centre.

Motorway Network impacts

The AA's biggest concern relates to the timing of Step 1: to convert Customs and Wellesley Streets into bus corridors and to re-route cross-city centre general traffic around the Central Motorway Junction (CMJ).

We raised concerns with the implications of redirecting city centre, and in particular, east-west traffic onto the motorway network in our 2019 submission on the *City Centre Master Plan refresh*. We noted next steps on A4E must include developing a comprehensive understanding of the traffic impacts and a plan for mitigating them. We are not aware if this work has since been undertaken.

The motorway network is one of the most critical drivers of Auckland's economic productivity. In the absence of plans to expand the network as demand continues to increase, it is essential that its performance is continually optimised.

The motorway network's core functions are to enable cross-city, regional and inter-regional trips. It is not designed for local trips (e.g. between different parts of the city centre or adjacent suburbs) and, where these do occur, they undermine the network's ability to successfully perform its key functions.

CMJ is frequently one of the most congested parts of the motorway network. This congestion is generally caused downstream of CMJ but causes congestion to queue back through CMJ. Adding additional traffic demand from city centre traffic will make this worse with flow on impacts for other parts of the motorway network, the Auckland economy and emissions goals.

The AA is particularly concerned about the impact on the existing major bottlenecks from the two to one lane merge on the Port to North and the North West to North links and the Wellington St on ramp. The additional traffic joining from the Port will mean there is no spare capacity for traffic to merge from the Wellington St on ramp merge on to the Victoria Park Tunnel entry. Before recent city centre roading changes, traffic demand between the north, the city centre and eastern suburbs was more evenly distributed between the Grafton Gully and Fanshawe St on ramps. This is consistent with and reflected the motorway lane design at Fanshawe (three lanes up stream and one or two additional lanes at Fanshawe – depending on the time of day).

In the other direction, from the Wellesley St ramp, vehicles needing to weave between lanes to access the correct motorway link also causes queuing to block back on to the Strand. However, to simply add local traffic to the mix without addressing the current CMJ constraints merely solves one problem by creating a new one.

Quite simply, CMJ, was not designed for local trips to move from one side of the City Centre to the other, it was designed to distribute longer inbound trips to different parts of the central city

Moreover, given the existing congestion on CMJ, there is a very real risk reductions in greenhouse gas emissions from the absence of through traffic in the city centre will just be displaced to the motorway – and made worse by the incremental congestion this will create on inbound motorway corridors.

We urge AT to work with Waka Kotahi to come up with a plan that will achieve the objectives of A4E and the City Centre Bus Plan without undermining the performance of the motorway network. This is likely to have implications for the timing and sequencing of the Bus Plan.

Need for a plan for City Centre traffic

The Bus Plan appears to indicate car trips into the city centre will remain stable at somewhat over 40,000 people trips a day between 2016 and 2038 before increasing by a few thousand per day in 2048. It is unclear what these projections are based on.

However, the AA's main concern relates to how a city centre which has been prioritised for active modes and public transport will be able to accommodate the same number of vehicles without undermining Auckland Council's and AT's liveability, amenity and emissions reduction goals.

Assuming the government passes the required enabling legislation, congestion pricing will reduce some trips but is only intended to "knock the top off" vehicle demand rather than result in wholesale reductions in traffic. Small scale emissions zones may have a place in one or two locations. However, there is no question in our mind that, consistent with all other comparable cities, significant numbers of private vehicles will continue to need decent access to Auckland's city centre in the foreseeable future.

Comprehensive vehicle restrictions or prohibition therefore risks deterring or discouraging large numbers of Aucklanders from visiting. To remain vibrant, economically-productive and a place that attracts all Aucklanders, the city centre needs to remain accessible for private motor vehicles *and* become *more* accessible for people arriving by any other means.

We strongly recommend both Auckland Council and AT develop a plan to mitigate the impacts of ongoing proposed and planned vehicle restrictions on the economic and social wellbeing of the city centre.

Value for money

The AA strongly supports the proposal to move from terminating buses in the city centre to running services through the city centre and the need for bus facilities.

The draft plan notes that buses have operated successfully without a central facility since 2003 but in recent years the space available for buses [and general traffic] has been reduced to provide more space for pedestrians and cyclists.

However, it is unclear to us why Auckland now needs five or six bus facilities. We wonder why the service redesign is still entirely focused on bus services terminating in the city centre, albeit on the edges. We assumed AT would have taken the opportunity to link up some of the major services on either side of the city centre and run longer routes as is common in overseas cities and Wellington. This would mean there is less need for multiple bus facilities and would provide Aucklanders with increased opportunities to access a wider number of destinations without the need to change services. In doing so, it would also help address the widespread perception that Auckland's public transport is almost exclusively focused on journeys to and from the city centre.

We understand almost all AT's current PTOM contracts with bus operators will expire around 2028 which is within the timeframe for this plan. Land acquisition and construction of multiple bus facilities in the city centre will require significant capital investment. We question whether now is the time to step back and take a more strategic look at whether there are opportunities to provide

Aucklanders with improved bus services without building so many bus stations. We are also unconvinced introducing multiple bus facilities to the city centre is the best fit with the City Centre Master Plan vision.

We note the Bus Plan is considering integrating interregional and urban buses in a single facility. In our view, the current Sky City Inter-Regional Terminal is excellently located for regional coaches which come from and leave for the nearby motorway network, appears to have more than sufficient capacity for the 70-plus coaches it serves a day and it is costing ratepayers and taxpayers nothing. Moreover, from 2025 it will be a stone's-throw from Auckland's busiest rail station and all Wellesley Street buses so could hardly be better located for passengers wishing to connect to Auckland public transport services. We also note that disembarking passengers use a variety of transport modes for the next leg of their journey (e.g. passenger are picked up by Aucklanders, walk to city centre destinations, taxis, ride share etc and only a portion wish to board a bus). For these reasons, at face value, constructing an integrated urban and interregional bus facility would seem to be a wasteful use of scarce transport investment.

Optimal timing of capital investment

Beyond simple bar graphs, neither the Bus Plan nor the Bus Reference Case include information on the demand projections. Consequently, it is not possible to ascertain the extent to which these projections have accounted for significant recent changes that are likely to result in at least some levelling off in the growth in demand for public transport in the medium term.

AT has publicly acknowledged that in Auckland, as elsewhere in the developed world, the requirement for office workers to work from home during the Covid pandemic has resulted in a structural change in demand for public transport. In short, people and organisations have discovered that it is practical to work from home, particularly with the use of meeting and file sharing technology. Moreover, there are major environmental and transport benefits from doing so and a large number of workplaces have subsequently implemented work from home policies. (As an aside, given Auckland's goal of cutting greenhouse emissions by 64 percent in the next nine years we are assuming this will be an area AT will be championing as a key plank of its transport demand management policies).

In the absence of any empirics on the impact of the move to work from home, we would think it conservative to assume most office workers will work from home one day a week. This would suggest an ongoing 20 percent reduction in the growth projection for public transport, including buses.

Second, the government has announced there will be a complete reset of our immigration settings. As the recipient of just over half of New Zealand's migrants, this matters more for Auckland, including for transport demand projections, than other parts of the country. Auckland's rapid population increase over the previous decade was largely due to an unparalleled increase in migration matched by very few places in the world. This was an aberration. It has been roundly criticised for the pressure it placed on our housing and infrastructure and the fact that while it increased GDP, national productivity, or GDP per capita, barely moved. Whatever the new settings are and however much they might change under a new government, it is manifestly clear there will be no return to the huge numbers of the previous decade.

Third, it is our experience that almost every single transport project suffers from optimism bias in its demand projections.

We have commented above on the intention to construct up to six “bus facilities” in the city centre. Given the significant land costs involved and the high demands for transport investment outside of the city centre across much of the Auckland region, we assume the forecast growth in bus passenger demand reflects up-to-date assumptions on work from home, population growth from migration and has been independently peer reviewed. If not, given the ongoing significant priorities for transport outside the city centre, we recommend updated forecasts be used to inform the timing of all proposed capital investment.

Summary

Thank you again for the opportunity to submit on the proposed City Centre Bus Plan.

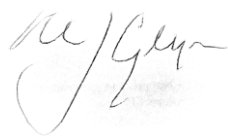
The AA supports the overall direction of the Bus Plan but reinforce our serious concerns about the impact of re-routing city centre traffic around an already heavily congested motorway network. We strongly recommend AT work with Waka Kotahi to come up with a plan that will achieve the objectives of A4E and the City Centre Bus Plan without undermining the performance of the motorway network. We note this may have implications for the timing and sequencing of the Bus Plan.

We are also concerned how a city centre that has been prioritised for active modes and public transport will be able to accommodate the number of vehicles AT is expecting in the future without undermining the city’s liveability, amenity and emissions reduction goals. We strongly recommend both Auckland Council and AT develop a plan to mitigate the impacts of ongoing proposed and planned vehicle restrictions on the economic and social wellbeing of the city centre.

The AA strongly supports the proposal to move from terminating buses in the city centre to running services through the city centre and support the need for bus facilities. However, the intention to move from no to up to six bus facilities seems excessive from a value for money perspective. Moreover, it is unclear why at least some existing bus services on either side of the city could not be combined to reduce the need for all services to terminate on the edge of the city centre.

The AA assumes forecast growth in bus passenger demand reflects up-to-date assumptions on work from home and migrant-driven population growth and has been independently peer reviewed. If not, given the ongoing significant priorities for transport outside the city centre, we recommend updated forecasts be used to inform the timing of all proposed capital investment.

Yours sincerely



Martin Glynn

Principal Advisor Advocacy

NZ Automobile Association