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AUTOMOBILE
ASSOCIATION
INCORPORATED

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NZAA Submission on Auckland Council's Low Carbon Strategic Action Plan

The New Zealand Automobile Association ("NZAA") welcomes the opportunity to make a submission to the Auckland Council (the Council) on its Low Carbon Strategic Action Plan (Action Plan).

The NZAA is an incorporated society with 1.4 million members, including nearly 300,000 Auckland members. Originally founded in 1903 as an automobile users' advocacy group, today it represents the interests of road users who collectively pay over \$2 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. The focus of the NZAA's advocacy role in Auckland is to be the voice of the reasonable motorist on key transport infrastructure issues, and ensuring that the decisions over which projects to build and how to pay are shaped by value-for-money and principles of equity. Our goal is a safe, sustainable, and strategically aligned transport network that provides greater mobility options for our members and for all Aucklanders.

Approach

The submission provides:

- general comments on the Action Plan
- comments on the relationship between the Action Plan and the Unitary Plan
- comments on the 21 transport action points in the "Transforming the way we travel" section of the plan
- our recommendation that the Council creates an evaluative criterion for the actions of the Action Plan

General comments

Overall, NZAA offers limited support for the Action Plan.

We are concerned that the Council is moving beyond its remit provided under the Local Government (Auckland Council) Act 2009, as the Act does not mention the words energy or climate at any point. Furthermore, we believe that an emissions scheme is best located at a central government level. This will allow for a consistent approach by **all** territorial and unitary authorities.

Since the Council is not under any legal requirement to undertake the Action Plan, we see the Action Plan as a discretionary activity for the Council.

The Action Plan sets out a bold vision for Auckland. While we support elements of this, we need to see more information about the financial impact and ramifications of these targets on our Members and the transport network. It is important that any financial imposition regarding reducing carbon emissions on our Members is fair and equitable.

The transport pathway to 2040 sets out ambitious targets (pages 26 and 73) that provide the basis for the action points. However, our concern is that they appear arbitrary and incomplete. We also have doubts as to whether the modal shifts that the targets seek are achievable. A 10% cycling mode share by 2040 and the completion of the Auckland Cycling Network by 2020 will require a substantial shift in attitudes towards and financial investment levels in cycling. NZAA would like to see further information regarding the financial modelling around the targets, their meaning for Aucklanders in terms of benefits and costs, and their strategic relationship to other Council planning documents.

We would like to see greater connectivity between the Action Plan and the other spatial plans that fall under the Auckland Plan. While we understand that the Unitary Plan will be a significant driver on the Action Plan, we feel that in its current form, the Action Plan is lacking links to plans such as the City Centre Master Plan or the Waterfront Plan. It is important that **all** Council plans and strategies are inter-linked.

As the Action Plan states, Auckland is highly dependent on automobiles, a reality that will not change in the near future. We note that the Action Plan does not include any measures about solving the current low occupancy rates of vehicles in Auckland. Auckland Transport has implemented priority lanes for carpooling across the city at on-ramps, transit lanes and priority parks at Albany bus station and Devonport and Birkenhead ferry terminals. While existing registered numbers of those who carpool is low in Auckland, NZAA believes that that carpooling is a cheaply run, effective and efficient means to help alleviate congestion.

Unitary Plan

NZAA notes that the Unitary Plan is currently undergoing the notification process. We believe that the notified Unitary Plan could be different to the one that the Action Plan refers too. Consequently, these will not align. There has already been significant public, media and stakeholder pushback by Aucklanders about intensification and the idea of a compact city during the Unitary Plan submission process.

NZAA also notes submissions taken from other organisations argue, and anecdotal evidence suggests, that the provisions of the Unitary Plan may not achieve the housing targets within the Auckland Plan. A failure to meet the aspirational housing targets of the Auckland Plan through the Unitary Plan may affect the successful implementation of a number of the action points that rely on a compact and intensified city.

Commentary on the “Transforming the way we travel”

The next part of our submission sets out our comments about each of the transport action points.

While we offer support to some of the action points, we have concerns that the Action Plan is unfairly targeting motorists. The Action Plan over-emphasises the role of emissions from private transport (half of transport emissions, but from a very large fleet pool; whereas, a small percentage of heavy vehicles contribute the other half). Furthermore, it overlooks the economic contribution that cars have to the economy through accessing employment, goods and services.

A small percentage of vehicles (trucks and buses) are travelling very high annual mileages and emitting a lot of CO2. The Council should target these vehicles for initiatives that focus on, bio fuels, technologies that are more efficient and better in-service emissions, which is a proven problem for diesels (not petrol cars). The costs of these initiatives are recoverable in the price of goods or services (whereas motorists cannot recover the increased costs of adopting these technologies in their own vehicles).

Element 1: Reducing the demand to travel

The NZAA has no objection in principle to Auckland Council providing a greater range of transport choices to Aucklanders. Where the NZAA does have concerns is in restricting choices its Members may already have.

Transport is a derived demand. Few people travel without purpose. It is essential that an increase in transport options is not simply a deemed increase in transport options but a *practical* increase in transport options. Practicality is key measure of choice.

Ultimately, transport is an individual benefit best planned and paid for by individuals to meet their own purposes. While cities may be able to provide services to meet aggregate demand for some purposes with public transport (e.g. commuting) they should not attempt to meet all purposes (e.g. delivering pizza). Auckland should specify which purposes it seeks to provide greater choice for.

The provision of greater transport choice does not automatically imply that the Council should fund or provide a range of choices. The provision of taxi stands or cycle parking may create choices funded and provided by private actors and operators.

Our comments on Action Points 1-5 concerning reducing the demand to travel are below.

Action Point	Comments
1	While NZAA supports this action, we are concerned that any reprioritising of expenditure to provide greater transport choice or reduce private motor vehicle dependency may result in a net reduction in road safety funding. As automobiles will continue as the dominant transport mode in the future, it is therefore, important that the Council continue to invest in road safety initiatives.

	At its current mode share, road safety will improve in the future due to improved vehicle safety, like collision avoidance technology. New cars have better pedestrian safety features too, such as pedestrian-friendly frontal designs and heat sensing night vision.
2	<p>While NZAA supports this action, we are concerned that any reprioritising of expenditure to provide greater transport choice or reduce private motor vehicle dependency may result in a net reduction in road safety funding.</p> <p>The Council should encourage car-pooling and non-transport mechanisms such as a greater uptake of telecommunications for work as means to reduce to congestion.</p>
3	We support the work that the Council has undertaken so far on transport pricing and look forward to the future solutions that are fair and equitable for our Members.
4	We discuss our concerns above about the possible misalignment of the Action Plan and the Unitary Plan.
5	<p>We are against this action point as the Council are interfering in the free market by manipulating access to car parking. As such, we do not support reducing the requirements for off-street parking.</p> <p>Removing minimum car parking requirements may remove transport choice for many Aucklanders, especially those who are handicapped, aged or infirm, provide important services or who cannot access public transport. Furthermore, when demand for car parking outstrips supply, driver frustration can lead to an increase in illegal car parking and road safety issues.</p> <p>We believe that the Council should consider utilising smart parking technologies like congestion charging through peak and off-peak charges (which vary according to demand) which is currently occurring in Palmerston North. This might lead to better utilisation of car parks and encourage more off-peak travel when fees are lower.</p>

Element 2: Increasing the use of public transport, walking and cycling

NZAA understands that there is strong **potential** demand for cycling and that it can contribute to decongestion in Auckland. Council financial investment in walking and cycling has steadily increased in Auckland since the inception of Auckland Council. While we support these projects, we believe that demand signals and the costs and benefits for Auckland of these projects need to be better articulated.

Below are our comments concerning the action points that seek to increase public transport, walking and cycling mode share in Auckland.

Action Point	Comments
6	<p>NZAA supports safe and accessible street designs that support walking. A safe and reliable footpath network enhances scope for alternative modes of transportation. We would like to stress also that footpaths that are renewed, should be those that require renewal.</p>
7	<p>We support the Council in seeking to boost greater public transport patronage. We believe that greater investment in bus infrastructure and quality of service is essential. However, we are unsure about the need to increase passenger rail frequency in the off peak times due to the cost of running these services. It is debatable whether there will be the passenger numbers to support these services.</p> <p>We would also like to see integrated ticketing also including smart phones; Wellington is using this for Apple phones. There needs to be co-ordinated approach in Auckland to roll this out across all phone types and public transport modes.</p>
8	<p>We support Auckland Council’s desire to improve the share of active modes, given the benefits to congestion, public health and the environment. Our members support initiatives such as making safer connected cycle routes by using empty berms and footpaths as well as more pedestrian and cycle bridges over busy roads. These initiatives may assist in an uptake of active mode usage.</p> <p>NZAA does have concerns that there appears to be a “build it and they will come” mentality towards cycling in the Action Point. We will not support the reallocating of transport funding from road safety initiatives to cycling infrastructure construction at the detriment of road safety or higher priority projects.</p>
9	<p>We support improvements to the existing bus priority measures.</p>
10	<p>As we have consistently advocated, NZAA believes believe that timing for large public transport investment needs to be guided by clear demand signals, and certainty around what the projects will mean for Aucklanders in terms of costs and benefits (including traffic congestion relief).</p>

Element 3: Improving transport efficiency to reduce the consumption of fuel

NZAA supports smarter management of the transport network through improving its efficiency. With competing priorities for funding and space, it is important to maximise a transport asset to its full potential.

Moving freight from the road to rail is a measure towards not only reducing carbon emissions, but also for reducing congestion and providing additional safety benefits on the motorway network. As Ministry of Transport’s recently released *National Freight Demand Study* points out, 91% of freight task is by road transport and only 7% by rail. Freight modal shift to rail offers tangible congestion benefits to our

members. However, it should not come at the cost of poorer connectivity, timing and increased costs to businesses using rail that may flow onto our Members.

There is a lack of synergy between the emphasis on inter-regional freight rail in the text and the subsequent action points, none of which touch upon mode shift. If increasing inter-regional freight rail is the goal of this element than NZAA suggests rewording these action points. The focus should be on providing a strategic vision on how this mode shift will occur and how it will dovetail into the wider transport network. We suggest the inclusion of KiwiRail in any work on inter-regional freight you undertake.

Action Point	Commentary
11	As NZAA fully endorses driver-training programmes, we support this action point.
12	We support this action point; we are already seeing the positive benefits of Auckland Transport’s smart travel information measures.
13	While we support this action point, we would like to see the number of contributors broaden to include Central Government agencies like KiwiRail and Ministry of Transport as well as private sector freight businesses.
14	NZ already adopts the latest standards and our small market means we cannot influence manufacturers. Auckland Council should investigate introducing an in-service emissions monitoring programme, especially for diesel commercial vehicles (ensuring vehicles continue to comply with the standard, or are serviced if they do not. This will reduce net emissions).

Element 4: Moving away from the use of fossil fuels

With today’s technology, almost all transport in Auckland uses fossil fuels. This includes the aircraft at the airport, the ships visiting the port, the trucks and diesel trains transporting goods, the mobile businesses operating daily, all Auckland buses, and the vast majority of Aucklanders providing their own transport and subsidising others. Currently, these make up approximately 40% of all greenhouse gas emissions in Auckland.

NZAA supports initiatives that encourage the voluntary uptake of low or zero-emissions transport energy solutions, and which gives motorists and commercial transport operators a wider choice of transport fuels. Motor vehicle development is in a constant state of flux, with significant technological developments occurring rapidly. The future of vehicles is renewable power, for example, electric, hydrogen, and bio fuels. Furthermore, the electrification of the rail network and the electric train-set roll out is another step towards breaking this fossil fuel dominance.

Action Point	Commentary
15	We believe that the Council should broaden the targeted trials by investigating introducing an in-service emissions monitoring programme, especially for diesel commercial vehicles (ensuring vehicles continue to comply with the standard, or are serviced if they do not, will reduce net emissions).
16	While supportive, we do not want to see a disruption in public transport services while the conversion is taking place. Any conversion must also not have a significant financial impact for the Council.
17	We would like to see the Council working with a range of industry stakeholders in undertaking the public awareness campaign.
18	Electric cars are already on the market and we can expect an increased shift to them in the future. An electric vehicle-charging network could provide an impetus for an increase in their uptake.
19	As a fleet operator itself, the Council could provide a market incentive for biodiesel and electric vehicle alternatives or through stricter emission standards in its contractors to bus service providers. The use of such technologies would provide a degree of leadership and a demonstration the Council “walks its talk”. We are cautious of about initiatives that seek to convert cars to alternative fuels as they are not cost effective and only keeps older, less safe vehicles on the road for longer.

Developing an evaluative criteria

The Council should establish clear and transparent evaluative criteria for all the actions in the Action Plan to ensure that spending of public funds is efficient and targets carbon dioxide emission reduction. This criterion will curb political enthusiasms that may provide disproportionate subsidies to particular sectors or businesses in the marketplace.

Low carbon initiative investment criteria

The Action Plan proposes reprioritising future expenditure to create a low carbon future. Such reprioritising creates winners and losers.

As the Action Plan is a discretionary activity for the Council, it is essential that their obligations are open and democratic, as specified in the Local Government Act 2003. Furthermore, the Council must clarify and publicise the investment criteria it bases its decisions on. This will:

- Establish clear return on investment processes for the projects
- Establish clear return on investment criteria for projects
- Make transport the basis for deciding between projects
- Highlight any undue influence in deciding between projects
- Highlight any prejudicial preferences in deciding between projects.

We envisage the Council basing initiatives on the net present value of the cost per tonne of carbon removal. Using this approach is cost effective and allows the Council to remove the most amount of carbon for the least expenditure.

Internationally, there are many examples of why the Council needs this criterion. Without them, influential businesses can capture significant subsidies under the guise of climate change. For example, a supermarket in Paris received a subsidy of €22,000 per tonne of CO₂ avoided by convincing the mayor that the city should pay for a rail distribution centre in the city centre. This occurred at a time when the European Emissions Trading Scheme valued a tonne of carbon at €22. Essentially public funds were subsidising the business.

Yours sincerely

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