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NZ Transport Agency – Tolling consultation

*via email*

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## **SUBMISSION FROM THE AA ON WARKWORTH TO TE HANA TOLLING PROPOSAL**

1. The NZ Automobile Association (AA) appreciates the opportunity to submit on the Warkworth to Te Hana tolling proposal.

### **AA position on the proposal**

2. The AA supports the Warkworth to Te Hana tolling proposal.
3. The AA is open to tolling a new road where we are satisfied the primary purpose is to support the road's construction, and there is a genuinely feasible untolled alternative route available to motorists who do not wish to pay a toll.
4. The tolling proposal for Warkworth to Te Hana meets these tests. The proposal states that toll revenue will contribute to the annual payment to the Public Private Partnership (PPP) delivering the road, and we are satisfied that the existing State Highway 1 provides a genuinely feasible alternative route.
5. We support the use of two toll points, north and south of the Wayby Valley interchange. This approach will enable motorists travelling only part of the new road to pay a lower toll than those travelling the road's full length.
6. We have reviewed NZTA's modelling, which indicates that most motorists will choose to use the new road at the proposed prices, and are satisfied that the assumptions underlying the modelling are appropriate. We support having different toll charges for each toll point. The lower charge proposed at toll point 1 is makes good sense given the northern section offers a smaller travel time saving relative to the existing State highway 1 for local trips, making it less attractive for a proportion of motorists.
7. However, we note that under the tolling proposal the BCR for the project is 0.8, compared with 1.3 if it is not tolled. Given the very considerable investment required for the road's construction, the AA recommends NZTA consider lowering the toll price so that more motorists will choose to use the road, with a view to achieving a result that will mean the project's benefits exceed its costs.

## **Additional matters**

### *Affordability for motorists*

8. NZTA has stated that it will assess each new section of the Northland Corridor for tolling. We support NZTA's indication that when tolling is being considered for future sections, the existing sections will be considered as part of the whole corridor. We look forward to seeing these assessments.
9. The consultation material for the Warkworth to Te Hana tolling proposal does not make clear how the Northern Gateway toll road, at the southern end of the corridor, has influenced the final toll prices NZTA has proposed. We are disappointed this information has not been made available as part of the consultation, and would appreciate it if NZTA could provide information to the AA to show how the Northern Gateway toll road has influenced the proposed toll prices for Warkworth to Te Hana.
10. As more toll roads are put in place – and more motorists rely on toll roads – tolling has the potential to raise affordability issues for frequent users. The AA recommends NZTA introduce a \$50 cap on the toll charges that any non-commercial light vehicle incur in a single week, across all toll roads.
11. We consider a \$50 weekly cap would improve affordability for the heaviest toll road users and help to build public support for tolling, without resulting significant revenue loss. We note that New South Wales has a \$60 weekly cap on toll charges for residents.

### *Duration of tolling scheme*

12. As noted, the tolling proposal makes clear that toll revenue raised on Warkworth to Te Hana will contribute to annual PPP payments. If NZTA decides to go ahead with its proposal, we recommend any toll on Warkworth to Te Hana should only remain in place for the duration of the PPP, and for transparency, this should be made clear in the Order in Council establishing the toll road.

### *Closing comment*

13. Thanks again for the opportunity to comment on the proposal, and for proactively releasing comprehensive information on the toll assessment at the start of the consultation period.
14. We are very happy to meet with NZTA to discuss any of the matters raised in this submission, if that would be helpful. Please contact Sarah Geard on [sgeard@aa.co.nz](mailto:sgeard@aa.co.nz).

Yours sincerely

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