

# Submission: GPS 2021 & NZRP

To: Ministry of Transport  
From: Auckland Transport Board  
Date: 12 May 2020  
Subject: Submission to the Ministry of Transport on the Proposed Government Policy Statement on Land Transport 2021 and the Draft New Zealand Rail Plan

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## **Auckland Transport**

Auckland Transport (AT) is a council-controlled organisation of Auckland Council. AT takes the lead in Auckland's transport planning and delivery. AT is also the road controlling authority (RCA) for Auckland's transport system (excluding state highways) and has responsibilities for all local transport services across the region serving customers and citizens driving, walking, cycling, parking, and taking trips on buses, trains and ferries. Auckland Transport plans, builds and maintains infrastructure - from roads and footpaths, stations and wharfs. Auckland Transport's day-to-day activities keep Auckland's transport system moving.

Given the importance of the GPS to our capital and public transport service programmes, we take a keen interest in the document – particularly from a funding and policy perspective. We also have an interest in the NZRP, given the critical role rail plays in Auckland's transport system.

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## **Introduction**

Thank you for the opportunity to provide feedback on the Draft 2021 Government Policy Statement on Land Transport (GPS 2021). AT would like to commend the Ministry for setting out clear context and process for how GPS 2021 is developed and undertaking a broad consultation approach.

We understand that formal engagement on the draft New Zealand Rail Plan (NZRP) is cancelled in response to Covid-19, and instead the Ministry of Transport (MoT) is inviting feedback through the GPS 2021 submission process. Therefore, this submission also provides AT's feedback on the NZRP.

### **Part 1: Feedback on GPS 2021**

In summary, our submission:

- Raises the issue of the revenue loss impacts associated with the Covid-19 crisis and seeks greater clarity from the GPS as to how the transport sector should respond to the Covid-19 crisis.
- Supports the inclusion of the Auckland Transport Alignment Project (ATAP) in the GPS as a 'Government Commitment' but seeks greater certainty on the realisation of key funding assumptions, including the 50/50 funding split between Council and the NZ Transport Agency and asks that the GPS is amended so that NZTA gives effect to the funding commitment.
- Seeks greater agility within the funding system to better support innovation and uptake of new technologies by widening the scope of what can be funded and taking a more outcomes-based approach.
- Supports the strategic priorities proposed in GPS 2021, these being: Safety, Better Travel Choices, Improving Freight Connections and Climate Change. We recommend including broadening the focus on climate change to cover the wider 'environment' to support

progress in addressing a range of key environmental issues.

- Emphasises the pressures that Auckland faces (namely growth in demand and costs for delivery and operations) particularly around impacts on public transport services and ongoing renewals, noting the underfunding of the renewals activity class.

## Part 2: Feedback on the draft NZRP

AT is broadly supportive of the draft NZRP. Our concerns (on alignment between the Rail Network Investment Programme and Regional Land Transport Plan (RLTP)) were raised through discussions on the draft legislation that seeks to give effect to the new rail planning and funding framework. We anticipate that our concerns will be addressed in amendments to the NZRP to align with the legislation.

## Part 1: Feedback on the GPS 2021

AT's feedback on the GPS 2021 is arranged into the following three areas:

- 1.1 Covid-19 – Role of the GPS in directing a policy response
- 1.2 A funding approach to deliver ATAP and Government's policy objectives
- 1.3 Policy content – Feedback on the GPS strategic priorities and activity classes

### 1.1 Covid-19

AT considers GPS 2021 as the key opportunity for the Government to provide policy direction on the land transport response to the Covid-19 crisis.

In particular, we are concerned about the effect of the Covid-19 crisis on key transport revenue sources. While the impact on our programme is still uncertain, Council revenue shortfalls are likely to result in a significant slowdown in delivery of AT's capital programme including capital investment in public transport infrastructure, with a detrimental flow-on impact for the construction industry. Meanwhile, we expect significant shortfalls in public transport fare revenue due to the need for social distancing and public concerns over public transport use.

We recognise that some of these impacts on the capital programme, particularly in the short-term, will be addressed by the Government's Stimulus Package and have also welcomed the NZTA covering a loss in fare revenue over Levels 3 and 4 of the lockdown. However, given the economic implications may continue for longer, we are looking to the GPS and other mechanisms to help provide the funding certainty that will be required to maintain current construction, maintenance and public service programmes.

Key issues that we think the GPS 2021, along with the wider transport funding system, will need to address are:

- Short-term funding security to both the National Land Transport Fund (NLTF) and local authorities. Our concern is that, without a broad-based funding solution, the stimulus effects of capital investment will be limited and projects that deliver local benefits or public transport and active modes benefits will be disproportionately impacted. Further capital projects take with them long-term operating costs that have a long tail of impact on the NLTF. Shortfalls in public transport fare revenue are also likely to lead to a reduction in some services to fit within available operational funding.
- Developing a policy-approach to medium-term economic stimulus and recovery, potentially including some refocus of short-term priorities. Policy guidance would be helpful to ensure coordination and shared expectations between RCAs as we tackle the challenges of economic recovery.

There may also be opportunities for the GPS to support natural resilience to this kind of shock by supporting working from home and more localised travel.

## **1.2 A funding approach to deliver ATAP and Government's policy objectives**

Aside from managing the impact of Covid-19, AT's foremost concern is that the GPS 2021 supports delivery of the ATAP programme and helps to address funding issues we have encountered after that programme was agreed. Although we recognise ATAP is not a statutory planning document, it reflects the RLTP, and is consistent with the national transport planning and funding framework under the LTMA. It integrates all major transport projects for Auckland delivered by AT, NZTA, KiwiRail and CRLI whether in the RLTP or not, and is in the nature of a sovereign agreement between the Crown and Council as to priority and full funding of these programmes.

### ***Delivery challenges***

A key issue is that the funding agreement in ATAP of a 50/50 split between the Crown and Auckland Council that relate to AT's capital programme are not being reflected in the programme funding decisions of NZTA. Critically, Auckland Council's Long-Term Plan (which is the key source of our local share) is predicated on AT's ten-year programme being funded at the levels assumed in ATAP, including through a 50/50 funding share with the NZTA. However, to-date, funding support from the NZTA has been closer to 40 percent of the programme. This has led to delays in AT's capital programme and required additional Council support. While these issues have been managed so far, Auckland Transport will be unable to deliver its part of the agreed programme if this situation continues.

As a separate but related issue the time-lag between high level programme decisions in the RLTP, and contained in ATAP, followed by the detailed business case processes to support funding decisions by the NZTA are taking too long, are very inflexible, reduce certainty and increase cost. They can also act as a barrier to effective community engagement by creating large time-lags between engagement as part of the business case phase and actual funding decisions and delivery. While we appreciate the need for a sound business case process, a more streamlined solution needs to be found. We will continue to work with the NZTA to improve these processes, but seek stronger guidance from the GPS to address the issues we have encountered.

### ***Solutions – improved certainty within a more aligned funding system***

Given these challenges, AT welcomes the recognition in GPS 2021 of ATAP as a Government Commitment. We also welcome:

- the clear expectation that future National Land Transport Programmes should deliver on the investment expectations set out in commitments such as ATAP noting that the RLTP will be prepared at the same time as the ATAP refresh
- the assurance that the activity classes included in the NLTP provide enough funding to cover the central government share for commitments such as ATAP
- the opportunity to address these issues through the RLTP and ATAP updates and other mechanisms.

We interpret these changes as signalling funding certainty for the projects included in the RLTP and then the agreed ATAP programme. We also assume that these changes mean that activity class levels should reflect the agreed funding requirements of key parts of our programme, such as maintenance and renewals as our asset base continues to grow.

These changes will help to address some of the difficulties Auckland Transport has encountered with NZTA funding falling short of what was anticipated by the 2018 ATAP agreements and which could occur again as ATAP is refreshed. However, to ensure successful delivery of the agreed programme, we think the GPS needs to go further to ensure the funding framework in the NLTP reflects the agreed funding split and programmes in ATAP.

The changes proposed above would allow AT to concentrate on delivery of the agreed programme, offer certainty to the construction sector and enable us to pursue new and innovative procurement mechanisms based on that greater certainty.

## ***Addressing the constraints of the activity classes: a more outcomes-based approach***

While the approach outlined above would work for Auckland specifically, we think the activity class approach could still be improved by addressing the scope issues that impact on all approved authorities and other activities within RLTPs.

We welcome the Minister's expectation at paragraph 148 that the NZTA will find ways to remove barriers to innovation in its own programme and for other agencies. This is particularly important to enable appropriate social procurement and whole-of-system benefits. However, for innovation to occur in practice, the GPS itself needs to support this intent by deliberately widening the scope of activities that fall within each activity class.

To support innovation, a more outcomes-based approach to the activity classes and their definitions is key. We recognise this is a big step, but believe there is still significant room for improvement within the activity class definitions themselves, and in the guidance around expected results from policy objectives.

The scope of the public transport activity class is one example. This is currently restrictively defined as "Investment in new public transport infrastructure to improve the level of service". Instead, it could be redefined along the lines of "Investment in infrastructure that encourages increased uptake and mode change to public transport". This revised approach offers the flexibility to bring a range of new infrastructure and service types to the task of supporting mode shift, and doesn't limit the objective to 'level of service improvement'.

We recognise that restricting the scope of what qualifies under the fund also serves as a de-facto prioritisation methodology, and this may be appealing from a Ministry point of view. However, we think that ranking proposals based on their contribution to outcomes, rather than the scope of inputs or outputs, is a better and more agile approach - and one that NZTA's processes are robust enough to handle.

In the remainder of the submission, we highlight some specific areas where widening of the scope of what qualifies for funding would enable us to better-support government policy objectives.

### **1.3 Policy content**

AT supports the reframed strategic direction of GPS 2021. The reframed strategic priorities allow AT to interpret the Minister for Transport's direction on investment more clearly than the current GPS. We welcome the integrated nature of outcomes and co-benefits.

In order to further this integration and co-benefits, the GPS 2021 should provide clearer alignment between land transport and other government policy frameworks. Transport and land use integration relies on recognition of interdependencies at a governance level. Relationships between policy for government responsibilities such as health, education and social housing should be emphasised in the GPS 2021.

While GPS 2021 identifies the requirement to engage with Maori and reflect the Treaty of Waitangi through a Crown-Maori partnership, none of the priorities specifically identify any connection with Maori outcomes. GPS 2021 could provide more direction on how Maori outcomes can be incorporated into investment in the land transport system. The Climate Change strategic priority in particular provides an opportunity to deliver on Maori outcomes through environmental improvements.

AT recognises that value-for-money is integral to public investment and already inherent in decision-making processes such as the business case approach.

### **Strategic priorities**

#### **Safety**

AT supports retaining Safety as a strategic priority. This is aligned with Auckland's Vision Zero approach to managing the transport network.

Auckland's transport safety strategy sets a target of reducing current road deaths and serious injuries by 60 percent by 2027. This is more ambitious than the Government's target of reducing current road deaths and serious injuries by 40 percent by 2028.

In the Auckland context, safety of vulnerable road users is a particular issue, with there being more people, more active mode users and therefore higher exposure and risk.

### ***Better Travel Options***

AT is supportive of refocussing the current GPS strategic priority of Access into two, more focussed priorities of Better Travel Options and Improving Freight Connections. This will shift and increase focus on improving movements for goods and services.

Following are specific suggestions for note on this strategic priority:

- Section 2.3 should provide stronger direction on incentivising “the right” travel choices, not just travel choice. While this is directed at a local level by policy such as regional mode shift plans, we think this direction towards sustainable and efficient transport should come from the GPS as well.
- Section 2.3 should emphasise the relationships between land transport and other government policy frameworks e.g. education, housing, health.
- AT suggests that Section 2.3 should be more explicit in that this also means widening the range of travel options available. As written, this section could be interpreted as only making existing options better, which could be counter to the intent.
- Another co-benefit that we suggest is included is space efficiency. Where they are well-used active modes, public transport and high occupancy vehicles can be space efficient modes. This is particularly important in urban settings where there is contest for space.
- We support reference to regional mode shift plans We suggest reference to Regional Public Transport Plans (RPTPs). As statutory documents, these establish the expectation for public transport delivery and operation.
- AT suggests a more targeted indicator on public transport travel time reliability. This is proven as a key factor in public transport attractiveness.
- Further opportunities exist to resolve perverse outcomes affecting the transport system. An example is the (already exhorted) initiative to waive fringe benefit tax to enable employers to subsidise and incentivise employee use of public transport. This would enable and encourage the private sector to help deliver on this strategic priority.

### ***Improving Freight Connections***

AT is supportive of Improving Freight Connections as a strategic priority and transport planning with a mode neutral approach. Nonetheless, it should be recognised that Auckland's regional freight network hinges on truck transport and most intraregional freight trips are necessarily made by truck. AT has been developing a freight plan in conjunction with partners, including the MoT and industry stakeholders, for future freight projects which will look to improve freight connections within the Auckland region. AT provides the following suggestions for inclusion in regard to this strategic priority:

- Inclusion of an ‘efficiency’ indicator for freight to encourage best use of the various modes. This could assist with decisions in a mode-neutral way.
- Reference to reducing conflict between freight and metro rail services (for AT this would capture issues such as the third main line).

- Ensuring that the framing of this objective also supports projects that improve the efficiency of freight delivery by truck, particularly for intra-regional movements.

## ***Climate Change***

AT welcomes the inclusion of Climate Change as a strategic priority. This is seen as a critical step forward towards sustainability. In New Zealand, environmental health has strong link with cultural values, and it would be both appropriate and effectual to make this connection. There is room for greater detail and guidance as to how this priority can be achieved in the transport sector. Auckland Council provides further details on this in their submission, which we support. AT notes the following opportunities to support this area of strategic priority:

- Because there is no specific activity class for Climate Change/environment, and climate change investment is expected to be delivered through other activity classes, particular attention is required to providing planning framework and assessments that align and support positive environmental outcomes (under other activity classes). These processes need to be enabling for environmental outcomes such as bus fleet electrification. GPS 2021 should elaborate on how initiatives can be approached or assessed in a more innovative way to demonstrate climate change credentials and positively link environmental investment and economic prosperity.
- The only indicators proposed for Climate Change relate to air quality. Emissions reduction is only one aspect of managing climate change. Water quality, flooding and biodiversity are other environmental considerations with land transport system impacts. These environmental considerations should also be reflected through indicators.
- Air quality is affected by many factors unrelated to land transport such as heating sources and weather; potentially making this a spurious measure of progress. Because there are so many other factors contributing to air quality, it is important that government policy in other areas connects to strategic outcomes such as Climate Change (the HUD is an example, equally Ministry of Health and Ministry of Education have strong roles in land use development, thus impacting transport patterns).
- AT suggests that one way to meaningfully incorporate broader environmental outcomes is recognition of the role of “streetscapes” as a conduit to environmental outcomes. The presence of vegetation contributes to carbon sequestration and can assist with traffic calming, safety, ecological pathways and heat stress reduction. Streetscaping is an area of the land transport system that has traditionally not been funded.
- Other suggested indicators are proportion of the public transport bus fleet (including school buses), as low emission. Similarly, proportion of the private vehicle fleet as low emission.
- Although not strictly an environmental issue, explicit support for social procurement initiatives would also be welcomed as a key area where transport sector investment can contribute to wider social and economic outcomes.

## **Activity classes**

### ***Travel Demand Management***

AT requests retention of the TDM activity class, or at least modification to the GPS guidance to ensure that TDM is supported. AT is concerned that removal of clear references to this activity could impact on funding availability, though TDM is a key lever identified in ‘making the most of our existing land transport network’.

TDM falls into a number of areas, including safety, active mode and public transport promotion and improvements and all with a customer focus. This whole of system approach, as mentioned in paragraph 95-96, relies on behaviour change programmes such as TravelWise

as a key intervention. Not having a recognised activity class for this programme has proved to be an issue for us in the past, when our TravelWise and Business Travel Planning programmes were forced to align with the outcomes of just one activity class.

Auckland has significant history and success in the TravelWise programme with 420 schools participating (out of just over 550 schools in the region) and annual survey data on mode shift patterns for schools participating in TravelWise programme (in some cases 15 years' worth of data). Lack of funding for this programme would also impact on the effectiveness of actions from the Road to Zero strategy, i.e. improving school speed zones, enhancing safety and accessibility of footpaths and cycle lanes.

## ***Climate Change***

AT would like to see better links between the Climate Change priority and expected delivery through activity classes. We acknowledge that the climate change and environmental impacts of transport are generally by-products of most projects and therefore not simple to address through investment. To mitigate this, more thorough consideration needs to be given to how to shape and influence investment for positive environmental outcomes. AT acknowledges that the Government and Councils are currently involved with this work.

From a practical perspective, we are keen to ensure that GPS guidance is broad enough to allow for key climate mitigation projects. For example, a key opportunity for Auckland is early realisation of the Low Emission Bus Roadmap. AT plans to contract for low emission buses from 2025 onwards and have a full low emission fleet by 2040. Auckland's Mayor has recently stated a preference that AT accelerate the conversion of Auckland's bus fleet to electric vehicles. This would have implications for bus contract costs and renewals costs but is an area that could clearly bring benefits for the Climate Change strategic priority. AT suggests consideration of whether the Public Transport Services Activity Class could accommodate this funding.

## ***Road to Zero Activity Class***

AT welcomes the Road to Zero activity class and suggests amendments to Road Policing and Road Safety Promotion components to help achieve the Road to Zero 2030 targets.

The GPS 2021 includes the Road to Zero activity class as a new approach to improve safety and reduce death and serious injuries (DSI). Road to Zero includes initiatives that are currently funded as part of the promotion of road safety activity class, as well as road policing. AT supports this approach and that the activity class proposes significantly more funding than the current GPS.

Paragraph 12 states that around 70 percent of Road to Zero funding is allocated to areas outside Auckland and Wellington. Therefore, around 30 percent of funding allocation from the Road to Zero activity class is to Auckland and Wellington. AT requires further information on the Road to Zero allocation to understand whether or not there is sufficient allocation for AT's and our partner NZ Police's safety programme, including System Management activities and Workplace Health & Safety activities. For example, the Auckland 2018/28 Road Safety PBC recommends an additional one hundred Road Policing staff over ten years which does not align with the GPS 2021. AT requests confirmation that the funding allocated to Auckland aligns to the NZTA-endorsed 2018/28 Road Safety Programme Business Case (PBC) \$750 million investment.

We also note that the Road to Zero and walking and cycling activity classes should make allowance for the changes needed to support the 'Accessible Streets' regulatory package. In particular, there will be a need for education campaigns and infrastructure funding to achieve the intent of the Accessible Streets package in a vision zero context.

## ***Public Transport Services Activity Class***

AT supports the separate Public Transport Services and Public Transport Infrastructure activity classes.

AT recognises significant pressure for additional funding from public transport activity classes. This pressure comes from increasing costs of operating the network (some due to changes to the Employment Relations Act), as well as from the need to invest in new infrastructure to improve the network and provide additional capacity to respond to urban growth and to patronage growth. We seek clarification and assurance that regional public transport planning can be funded from the activity classes.

AT would like clarity as to whether the Public Transport Services activity class has sufficient coverage for the:

- SuperGold card operation, and sufficient provision for the continued growth/demand for SuperGold card to continue to be 100% funded,
- Indexation of drivers across services, new delivery models (such as ongoing Public Transport Operating Model (PTOM), rail and ferry procurement models that are being developed),
- Other Government public transport initiatives that may be anticipated (e.g. Green Card concessions).
- Costs associated with operation, maintenance and renewals for City Rail Link project (CRL) and for other rapid transit plans in Auckland. While these are likely to be outside the first 3 years of the GPS, the activity classes need to acknowledge this step-up once it is online.
- Anticipated increases in service frequency aligned with ATAP and our RPTP.
- Provision for the increase in PTOM contract costs associated with the electrification of bus fleets
- Explicit allowance for the use of this funding to support “On Demand” transport services – which is a key area AT is exploring as part of its approach to mobility as a service.

AT supports the GPS 2021 referencing regional mode shift plans. We also suggest reference to RPTPs – as these are after all the relevant statutory documents - and confirmation of funding in principle to public transport improvements as outlined in RPTPs.

Section 124 refers to rail network maintenance funding coming in part from the Public Transport Services activity class. It is not clear how much funding will come from the Rail Network activity class. Clarification on this would be helpful.

### ***Public Transport Infrastructure Activity Class***

A Rapid Transit activity class was included in the current GPS to invest in busways and light rail infrastructure. Under GPS 2021, the Rapid Transit activity class is incorporated into the Public Transport Infrastructure activity class, as is Transitional Rail.

AT is currently assessing the impact of continued high increases in rail patronage, including the boost that is expected around the time of the opening of the CRL. Continued growth may impact upon the timing of purchase of new trains, and supporting infrastructure, ATAP update will provide an opportunity to raise these issues.

### ***Walking and Cycling Improvements Activity Class***

Auckland has ongoing pressure to improve, retrofit and deliver active mode infrastructure, particularly for people on bikes. AT supports any increase in funding to enable improvements in these areas of historic under-investment (particularly for cycling infrastructure).

While funding for this activity class is around 3 percent of the NLTF and slightly more than in previous years, we query whether this will enable Mode Shift Plans.

We suggest referring to this activity class as “active modes”, including micro-mobility, to align with current planning and policy in these areas.



## ***Local Road Improvements Activity Class***

We note the pressures that population growth and growth in travel demand are placing on local road and public transport maintenance and improvements. This is an area where the size of the activity classes has limited what we can deliver. Given the commitment to ATAP in this GPS, we look forward to these activity classes being adjusted to address this issue.

Transport investment to support growth initiatives cut across multiple activity classes, including the local road improvements, Road to Zero and public transport activity classes. It is crucial that having assigned activity classes does not impede or preclude funding for transport investment in areas that do not clearly fall into one area, such as that required to support the growth pressure that Auckland faces.

A key example of this is the large-scale comprehensively planned growth occurring across Auckland within brownfield/redevelopment areas. AT requires funding in these areas to support quality, efficient and liveable urban form. These upgrades and improvements include intersection upgrades, new roads, safety improvements, walking and cycling improvements, and renewals (e.g. pavements, footpaths, kerb and channel, and drainage).

There are a number of initiatives that are currently unfunded but are required to support growth in greenfield and brownfield locations across Auckland and align with the Future Urban Land Supply Strategy. ATAP update will provide an opportunity to raise these proposals.

AT is concerned that there is insufficient funding in the Local Road Improvements activity class for Advance Property Funding, where route protection processes incur property costs in advance of construction, particularly for growth and major projects within the Auckland Region. In these instances, AT has to fund property purchase upfront and cannot apply for funding until construction is underway.

Electric buses are noted above as an opportunity for improving emissions. Related to this, this activity class may need to consider the incremental road renewal costs of electric buses.

## ***Local Road Maintenance Activity Class***

AT supports any increase in funding allocation to the local road maintenance activity class. AT has significant cost pressures in areas of maintenance, operations and renewals. This is caused by a number of issues including:

- higher standards to address environmental and safety issues (e.g. extra stormwater treatment requirements, SCRIM (pavement surface skid resistance) testing),
- cost increases in new maintenance, operations and renewals contracts,
- the impact of truck movements for increasing residential housing construction on parts of the local road network, and
- having to maintain an ever-increasing asset base.

AT has been managing these renewals costs by bringing forward budget from future RLTP years. This is an interim solution and the need for increased baseline budgets will need to be considered in the 2021-31 RLTP. Given the commitment to ensuring ATAP investment levels are achieved, we expect some modification to the activity class will be needed to alignment with ATAP funding assumptions.

## ***Rail Network Activity Class & Coastal Shipping Activity Class***

With two new activity classes for Rail Network and Coastal Shipping there is an opportunity to start to shape the freight network around these modes. However, funding for the Coastal Shipping and Rail Network activity classes is very limited.

Only some of the rail network improvements included in the agreed ATAP programme subsequently had funding provided to them through the Transitional Rail activity class. There are a number of ATAP projects that have not received funding, and the funding source

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therefore remains unclear. ATAP update will provide an opportunity to raise these proposals.

While KiwiRail is responsible for delivering most of these projects, AT currently operates as NZTA's Approved Organisation for these Auckland-based rail activities. As the Transitional Rail activity class no longer exists, the level of funding available within the Public Transport Infrastructure activity class may not allow for these projects.

There is a lack of clarity around which activity class will cover projects that KiwiRail are responsible for, whether there is enough funding allocation, and whether AT can access this fund on behalf of KiwiRail

The current GPS assumes the Land Transport (Rail) Legislation Bill will pass as currently written. AT has submitted on the Bill and requested changes. AT will assume any changes will be incorporated into the final GPS.

## **Part 2: Feedback on the Draft New Zealand Rail Plan**

AT welcomes the draft NZRP and supports the NZRP's strategic priorities for rail, which will support the critical role rail plays in Auckland's transport system.

As noted above, AT submitted on the draft legislation intended to give effect to the new planning and funding framework in the NZRP. In that submission we supported the Bill's intent but sought key changes regarding the alignment between the Rail Network Investment Programme (RNIP) and Regional Land Transport Plans (RLTPs), and also sought the protection of existing funding arrangements under the Auckland Network Access Agreement.

AT notes that the Select Committee has reported back on the Bill and expects that the NZRP will be amended to reflect the proposed changes to the legislation (assuming these are passed), in order to clearly articulate the new framework as enacted by legislation. The final NZRP should better-articulate how the RNIP and RLTP processes will interact.

AT supports the Investment Priorities for the Auckland Metropolitan Network in the NZRP, and notes that they are aligned with ATAP 2018 priorities. AT also expects that these priorities will be updated to reflect:

- The projects announced as part of the New Zealand Upgrade Programme (NZUP), including details on when these will be delivered, and which organisation(s) will be responsible for delivery.
- Subsequent changes to the Investment Priorities that may arise from the RLTP and ATAP update process (if available when the NZRP is finalised), which may include new projects to make use of funds available as a result of NZUP.