ENVIRONMENTAL PROTECTION AUTHORITY NZTA-PROPOSED NORTHERN CORRIDOR IMPROVEMENTS CONSOLIDATED WILLMOTT (CUTS) SUBMISSION

(I wish to be heard)

David Willmott

Co-Director, Centre for Urban and Transport Studies. Expert in efficient urban development. BE(civil), DipTP, DipMgt, PostGradStuds(TransPlan/TraffEng/TranspEcon/ResMgt). Perpetual student of Urban Economics built on undergraduate studies and wide experience in Benefit/Cost studies, including New Zealand's first.

Extensively experienced in urban land development including planning and engineering of major traffic generators, motorway network and geometric design, traffic engineering, transport planning. Further details appended and expanded, together with Associates, on CUTS website < CUTS.org.nz >

Manner personally affected by the NZTA proposal:

(1) As a taxpayer and ratepayer, I am concerned that New Zealand in general is living well beyond its means, substantially driven into a position of rapidly-escalating debt not least through antieconomic planning and uneconomic development in Auckland. Congestion currently costs Auckland about \$2 billion per year (and rising), and the overall cost of Council's anti-economic planning has been conservatively assessed at \$6 to \$8 billion annually. Despite raising taxes, our "rockstar" Government's debt has risen from \$8 billion to almost \$80 billion under this government alone. Average private sector debt at 160% of annual income is amongst the worst in the western world.

Environmentally, this results in excessive (and costly) consumption of resources, including energy, for (net) neglible and possibly net-negative acquisition of the environmental "goods". Yet such enviro-goods are held to justify implosion planning within a rigid Metropolitan Urban Limit (until widespread recognition of planning ineptitude represented by unsustainably unaffordable escalation of land acquisition and development costs recently aroused Government to force its breaching), demonization of suburbs and automobility, and attempted reversal of socially- and economically-driven decentralisation through force-feeding of a radial transit system.

The NZTA proposal represents a compromise between improving the connectivity of inter-city state highways (for which NZTA is responsible) and furtherance of the Council's anti-economic enviroplanning which seeks to put the United Nations' definition of primary global needs ahead of the wants and needs of citizens paying rates (and road taxes) to have congestion effectively addressed. ("Think globally, act locally"). Thus Council is not providing any urban arterial roadspace for general traffic, nor has any plans for same, and is legally empowered to require that, in an urban area such as this, NZTA respects Council's social engineering ideology. In not addressing the primary causes of motorway access congestion, the proposal enables Auckland's escalating cost structure to continue growing faster than incomes, ultimately with predictable consequences.

- (2) As a resident of the area directly affected, whose own <u>inter-accessibility</u> with all parts of Auckland is already significantly restrained. The design and expenditure proposed will do nothing to stop its further deterioration, when it could easily have improved it by the addition of south-facing motorway-to-motorway ramps serving the SH18 extension. Although I rarely use Greville interchange lack of direct motorway ramps between SH1 (south) and Albany Expressway is truly amazing.
- (3) As a committee member of the Greenhithe Residents Association (<u>support letter attached</u>) I am assailed by local people to "do something" about <u>traffic congestion</u>; Council's anti-car stance "doesn't work". Further, members of Greenhithe Pony Club (which my property adjoins), Riding for the Disabled (the committee) and the hockey people still known to me since I stopped playing about ten years ago all express <u>concern at the disruption and cost of relocating facilities and loss of culture</u>.

(1) Position on Constellation proposal:

I am opposed to the lack of inclusion, or even demonstrated provision, for 2-lane motorwaystandard flyover ramps lining SH18 and SH1 (south)

Decision sought at Constellation:

- (a) Require consideration of CUTS' design proposal as a way of addressing all the concerns about impacts on local communities-of-interest listed above, and (my perception of) the North Shore public interest in "enabling" automobility generally.
- (b) Require provision later if not within this project for direct motorway to motorway 2-lane ramps between SH1 (south) and SH20,
- (c) Require assurance that such ramps will not be precluded by any first stage development, through the provision of drawings to the EPA as a condition of acceptance of any proposal for staged development.
- (d) Require sensible and cost-conscious (like, BCR) justification of any additional provision for pedestrians and cyclists beyond those already available.

(2) <u>Position on Greville Proposal</u>:

Similarly to the Constellation interchange, the proposal does no more than tinker with local needs for accessing and or bypassing the interchange, and addresses only the needs of inter-regional traffic. In this case also, I am opposed to the development as proposed, because it has not been irrefutably demonstrated with engineering drawings and due consideration of the feasibility of their implementation that local needs can be at least accommodated in future by the addition of motorway-standard ramps linking SH1 (sth) directly into Albany Expressway. Such "proof" is an essential pre-requisite for my "support-in-part" of the current proposal

Decision sought at Greville:

- (a) Require consideration of CUTS' design proposal (as attached) as a way of addressing currently bad and worsening congestion primarily caused by the heavy Albany Expressway to SH1 southbound movement (and to a lesser extent the reverse northbound movement), which is the worst feature of the current interchange. The busway extension pales into insignificance in comparison, yet could well compromise future interchange development and motorway widening for 2mill pop'n by 2060
- (b) If not included within the project (as NZTA currently proposes), require proof that the design does indeed allow adequately for a subsequent direct 2-lane Expressway to SH1 motorway (southbound) flyover, and a similar 2-lane northbound flyover of the Tawa drive intersection with the Albany Expressway and Greville Road extension, without precluding existing motorway ramps (even if they require partial extension) AND the busway allows for motorway widening.

(3) Position on east-west ramps between SH18 and Constellation Drive

I recommend serious consideration be given to their being shifted to west of Paul Matthews Road. By not doing so, the NZTA proposal preserves a few low-cost portal frame industrial buildings while requiring expensive and socially-disruptive relocation of the hockey grounds with domino effects on four other recreational clubs which have spent hard-won funds settling in to their current areas. If the SH18-Constellation ramps were to be shifted west of Paul Matthews Road to terminate on it (refer diagram), only the fourth hockey field need be affected, and that could be restored by sliding it northeast towards Watercare property.

Decision sought on east-west ramps

(a) Relocate combined footpath and cycleway to the lower speed and more pleasant Bush Rd – Paul Matthews Rd route

(b) Use this vacated space together with a slice off such industrial buildings as required to allow a better traffic and geometric solution and enable saving of hockey facility to prevent domino effects

THE SUBMITTER:

The submitter is ...

... a qualified civil (infrastructural) engineer, town planner, resource manager, and (project) manager, with almost 60 years of wide-rangeing experience, both as a public servant and as a consultant to (effectively an employee of) three major global agencies and also as a private sector employee for some major consultancies and a specialist consultant in his own right. A detailed Curriculum Vitae is available on the < CUTS.org.nz > website.

The submitter's 55 years of work experience etc are detailed on the CUTS.org.nz website. Since 2003 I have lived at Greenhithe accessed by SH20 and have considerable knowledge of the project area and it's functioning. While there can be little improvement during my expected lifetime, this submission is made in the (perceived) interests of future generations.

In practice, the submitter has been (i) an internationally accepted (by IBRD, ADB and UNDP) motorway and arterial road network development planner, designer, and engineer; (ii) a general civil engineer (of functional infrastructure including structures, land subdivision and development, institutional and commercial centres, roading, drainage and traffic), (iii) expert witness before Civil courts, Tribunals and Boards of Enquiry on all of the above, (iv) a widely-read, stage 1 qualified and substantially experienced economic evaluator of projects and would-be urban economist, and (v) an economically-oriented policy-advisor, who has always sought to "enable" (rather than restrict, constrain divert and anti-economically cross-subsidise to influence) the value-choices ...:

- (i) ... of "free to choose" individual funds-conscious urban dwellers seeking acceptable-value housing, and acceptable inter-accessibility with all parts of urban markets (not just the 10% represented by the transit-promoting and -subsidising CBD) to optimise their opportunities for betterment thus productivity thus wealth in all its meanings, and thus to maximise their social, economic and experiential standards (quality) of life ("liveability"?).
- (ii) ... of private-sector developers who undertake risk for the possibility of reward in free, democratic societies, and
- (iii) ... of commercial/industrial/educational (etc) operators and job providers, all seeking locations and buildings that serve their own purposes rather than those of the promoters of an ideologically-driven "designer city", on the anti-factual assumption that the result will be (environmentally) "sustainable development".

What the submitter is not ...

... is a supporter of the globalist "sustainability" bandwagon ("think globally, act locally") which seeks to achieve globalist goals, ostensibly to "save the planet", but mostly to transfer wealth and power from us as individuals and as a western nation to those pretending (or deluded into thinking) they can "play God" with the climate and return local ecologies worldwide to some sustained (static, ie non-evolutionary) "Garden of Eden" state, such as is held to have existed before humanity ruined it.

Those so deluded/pretending, hiding behind their wholly-subjective determination of what is "sustainable" – and not – are forever pointing to "world's best practice", which means it is unaffordable by those so defined as a (growing and increasingly angry) "underclass" facing widespread bankruptcy when interest rates are "allowed" to rise to economic (ie market-driven) levels. These deluded/pretending people are also bent on "changing attitudes" – requiring wholesale change of moralities, values, choice of transport modes and diversion of the general public's "natural" reach for better living modes, standards of living and inter-accessabilities, ie

everything that "enables" and incentivises efficient urban development and activity – to serve their definition of what life should be like in "their" city after its economic viability is subjected to the United Nations' globalist reach for power, ostensibly to command subjection to its wholly subjective determination of what is (or is not) "sustainable".

For the "rule book", Refer Enviro-NGO drafted and UNEP's Earth Summits-adopted (Rio 1992 & 2012) **Agenda 21**, recently re-booted as **Agenda 2030**, which seek effectively to require all nations to pay tribute (such as carbon taxes) to the UN in exchange (effectively) for global government under its aegis. "Fair access" to (and their definition and "protection" of) "environmental resources" requires inter-national re-distribution, eg of (rationed and UN-allocated) energy consumption, ie global socialism with "the West" as a necessary sacrifice. "Sustainable development" thus equates with getting people out of their cars and into equally energy-consumptive (/person-km delivered,day-long) buses, or worse; comparatively energy-wasting trains.

For the "foundation" of "urban design" aka "designer cities", refer to the original (idealistic) architect-drafted Ahwahnee principles (appended), subsequently opposed by (more realistic) infrastructural engineers and urban economists meeting at the Lone Mountain resort, known as the "Lone Mountain Compact" (also appended). Under incentivised and coerced recentralisation policies, all forms of transport travel are required to travel longer distances than they would with "natural" decentralisation, thus reducing urban inter-accessibility within budgeted time-frames (throughout history and regardless of culture or state of development, averaging 1.5 of 24 hours for all translocation regardless of travel mode) This renders Western cities (especially suburbanised, decentralised and highly automobilised Western New World cities such as Auckland) inefficiently dysfunctional under the (supposedly) "smart" planning regime epitomised by the Auckland Plan, which is a recipe for economic and social failure. (Don't believe it? Look around you! And don't blame it all on immigration; we have done it to ourselves through an economically distortionary Auckland Plan.). Unless reversed, such failure will in turn result in increased environmental degradation, surely the EPA's bete noir.

<u>As regards the NCI</u>, such anti-economic "getting western people out of their cars" results in Council's insistence on NZTA's lack of provision of south-facing inter-motorway/-express-way ramps. Public frustration and anger? We have yet to see it's full realisation, and discover the consequences. They will hardly be "environmentally-friendly".

Submitter's Perception of Auckland Planning:

New Zealand claims to be a "free, democratic" nation. The "free" descriptor means freedom of (societally-responsible) choice, ie "enablement" of such choices. In agreeing to "roll our loan obligations over" at affordable interest rates following New Zealand's economic collapse (effective bankruptcy) in 1984, the IMF required New Zealand to "go more market" than the then-current form of town planning-by-restrictive zoning allowed. The RMA was thus devised to better "enable" (RMA S.5) the development and use of land (and movement between urban activities) with the primary restraint of requiring observation of "environmental bottom lines". In the absence of any real economic foundation to globalised, ideologically-driven and formulaic planning ideology, the intended (choice-enabling thus economic) "enablement" has been reduced to frustration, diversion, over-regulation and/or DIS-enablement of land use, development, and inter-accessibility. And all this through imposition of a highly-restrictive planning regime reliant on "environmental high-jump barriers", with extraordinarily costly effects and their consequences.

<u>If "enabled" in such freedom of choice</u>, urban dwellers would automatically undertake trade-offs (choices) that optimise their personal preferences in housing location and at standards they select to reflect their values and circumstances, from which they will optimally trade off (select) and exploit the opportunities, experiences and accessibilities that **all** (not just the CBD 10%) of the city offers, their personal values reflect and their circumstances can afford.

Given such freedom of choice, people can achieve greater betterment, are happier, and the city becomes "more liveable", than when those choices are made for them

Examples of the latter include (i) land development standards, restrictions, locations, coercions and other requirements rendering land (thus housing) widely unaffordable, (ii) some travel modes are favoured by planners over others as tools for promoting a "designer city" –specifically <a href="https://examples.com/housing-travel-to-late

As regards private and commercial inter-accessibility, there have been no recent Council-delivered roading projects which add general purpose arterial roadspace to accommodate the growing population. Rather, there have been many projects which convert pre-existing general roadspace – whether for travel or parking – to exclusive use by buslanes and cycle-lanes. Nor are there any plans to develop the urban arterial road network to provide alternative routes in an inadequate and congested system. Yet the Auckland Plan is designed to accommodate a substantial increase in population. How will they – and the extra commerce they generate - get around efficiently? (Transit, cycling and walking won't cut this sort of mustard). And if they can't, will they still come? Or, like Detroit, will they "abandon ship" for a city which offers more affordable opportunity? What about the rubbish collectors, the cleaners, even the nurses and teachers?

The NZTA-proposed NCI project

As regards the need for inaccessibility, the NZTA design does not address the primary needs of private vehicular trippers, all of which are commercial industrial or recreational by cause (ie are undertaken to better the undertaker's life) and are selected to optimise personal and company betterment. (This, when aggregated, determines the (relative) degree of societal prosperity.) Rather, the NZTA proposal condemns those trippers (and would-be trippers) to growing congestion, the cost and anti-harmonisation of which reflects excessive consumption of "environmental" resources.

Background to and consequences of the NZTA proposal

Such anti-societal planning generates substantial commercial/industrial frustration and public anger, which has already been the cause of many amendments to the RMA. These amendments however do not address the real cause of all such problems – our planners comprise a local chapter of a globalising Absolutist Enviro-Planning Complex/industry ("think globally, act locally") which ignores the "enabling" intent of the RMA by importing an American architect-inspired style of town planning known there as "Smart (sic) Growth" and elsewhere as "Urban Implosion" or "Compact Cities".

This style of town planning (NOT resource management) is presumed — absolutely without foundation — to deliver "sustainable development", effectively regardless of any local commercial, industrial and citizen wants & needs. Instead of "enabling" optimal satisfaction of those local wants and needs at standards and requirements which are affordable and represent value to those parting with their own money, we are saddled with the "world class" aesthetics-driven standards of a "designer city", imposed by those who are often genuinely unaware (or otherwise uncaring) of the effects of what they plan for others of different values and (often lesser) means. Widely-unaffordable standards and freebie-seeking by the special interest groups encouraged by legislation and resulting planning processes, result in turn in increasing reliance on welfare paid for by over-taxing "survivors" and by compounding debt, the already un-repayable levels of which result in it being thrust on to future generations. (So much for "inter-generational equity")

(Relatively) "free" (thus economic and affordable) choices – and attendant personal responsibility for any anti-social (including environmentally unsound) effects of those choices - are only possible in a genuinely free and democratic society. Under current local governance in Auckland, 20 lay Councillors are easily captured by the enviro-planning professionals amongst the 11,000 staff.

They defend the socially and economically ruinous "Compact City" enviro-planning ideology instead of serving the interests of the public they are paid by to represent. The result is a lack of representation of the public interest in south-facing inter-motorway ramps to motorway standard.

FURTHER EXPLANATION - GENERAL

There are two main functions of urban interchanges on inter-city motorways, being (i) accommodation of long-distance "through" traffic, and (ii) accommodation of intra-urban traffic. Only the former (west to/from north) is being accommodated in the NZTA proposal with direct motorway-to-motorway ramps. The NZTA proposal effectively makes no new provision for the considerably greater traffic from the west wanting to turn south towards the city. This traffic includes pretty much all that generated by that part of North Shore northwest of SH1 and SH18 and southwest of Oteha Stream, ie the whole of the Rosedale industrial area and residential areas beyond, together with about three quarters of traffic on SH18 from west Auckland wanting to turn south.

My position is that both should be accommodated, very preferably at the same time with any interchange upgrade. If (for any good reason, and I can not see one) the through traffic is to be accommodated but not the intra-urban traffic "at this stage", provision should be made in what is built - and demonstrated beforehand as being feasible including for provision of engineering drawings - for the intra-urban traffic to be accommodated at some time in the future, including particularly for direct SH1 (south) to SH20 motorway-to-motorway ramps. Such proof would warrant my "support-in-part"

The whole point of motorway design as I know it is to preserve obvious options, not to foreclose on them, as the NZTA proposal may be doing. And I consider the future extension of SH16 northwards past Kaukopakopa then via expressway to Wellsford will, in the not-too-distant future, be re-discovered as a necessary alternative outlet from Auckland (applying the same logic as was used to justify Transmission Gully rather than further widening SH1), requiring similar "switchover" provision for Harbour bridge and North Shore traffic to that currently proposed to be afforded SH16 to SH1 (north) traffic.

In contrast, provision is being made <u>extension of a CBD-serving northern busway</u> in a manner which may preclude further motorway expansion, when public transport in Auckland currently carries less than 4% of day-long driver + passenger vehicular trips, and which may be increased to 5% only by the expenditure of an inordinate (and unaffordable) amount of money per passenger. Today only 10% of employment is located downtown, down from 50% before WWII when radial trams were the only form of transport widely available. No city is the western world has succeeded in reversing this trend, no matter how much is spent on radial transit and active discouragement of automobility; decentralisation has enabled far shorter travel distance/time/ cost/energy usage for most traffic, enabling additional destinations to be accessed (and commerce/productivity compounded) within the total 1.5 hours average daily time-budget for all forms of translocation.

The busway on which so much is being expended sees buses only at (approximately) 5 minute intervals in the peak direction. 300 cars could be filled between these buses, and the other buslane (with buses running mostly empty) takes the place of a general purpose lane which, in peak hours, carries about 3,600 people per lane per hour. The buslanes are part of a combined bus-rail public transport system which, I consider, may serve around 5% of total daily vehicular traffic after substantial expenditure; the current patronage is about 4%.

The current desire to allocate scarce arterial roadspace generously to <u>pedestrians and cyclists</u> is based on the theory of "build it and they will come". This is a triumph of dogma over common sense. Auckland can never be compact like Copenhagen or flat and cyclist-friendly like Stockholm and Amsterdam. I expect minimal use of the facilities proposed (particularly between Albany

highway and Paul Matthews Road, where existing provision is not much longer and far more pleasant. I therefore recommend their exclusion.

Also, some modifications to the design (as proposed in the attached concept sketch) could allow retention of the Hockey Association's grounds, saving considerable cost, convenience and community angst over the domino displacement of the Rosedal pony club and Go-kart facilities, and consequential inconvenience and cost to the Wainoni horse club.

FURTHER EXPLANATION - POSITION ON CONSTELLATION PROPOSAL:

<u>Position:</u> I am opposed to the development as proposed

Only one of the two main functions of interchanges, being (i) accommodation of long-distance "through" traffic, and (ii) improving inter-accessibility for longer-distance intra-urban traffic, is being accommodated. My position is that both should be accommodated, very preferably at the same time with any interchange upgrade. If (for any good reason, and I can not see one) the through traffic is to be accommodated but not the intra-urban traffic "at this stage", provision should be made in what is built - and demonstrated beforehand as being feasible including for provision of engineering drawings - for the intra-urban traffic to be accommodated at some time in the future, including particularly for direct SH1 (south) to SH20 motorway-to-motorway ramps. Such proof would warrant my "support-in-part"

The whole point of motorway design as I know it is to preserve obvious options, not to foreclose on them, as the NZTA proposal may be doing. And I consider the future extension of SH16 northwards past Kaukopakopa then via expressway to Wellsford will, in the not-too-distant future, be re-discovered as a necessary alternative outlet from Auckland (applying the same logic as was used to justify Transmission Gully rather than further widening SH1), requiring similar "switchover" provision for Harbour bridge and North Shore traffic travelling to Kumeu and beyond to that currently proposed to be afforded SH16 to SH1 (north) traffic.

Also, some modifications to the design (as proposed in an attachment) could allow retention of the Hockey Association's grounds, saving considerable cost, convenience and community angst over the domino displacement of the Rosedale pony club and Go-kart facilities, and consequential inconvenience and cost to the Wainoni horse club.

Explanation: The usual difficulties in accommodating both urban needs (the responsibility of Auckland Transport as directed by creators of the current Auckland Plan) and inter-city and/or interregional needs (the responsibility of NZTA) in the one project give rise to inconsistencies between development proposals when one is advanced but not the other. There is no rational basis for such inconsistency; it would not occur if all urban projects accommodated both needs.

<u>Problems arise when there is conflict between multiple "clients"</u>. Such conflict exists in this proposal

(a) <u>Auckland Transport</u>: It has become evident over decades that Auckland Transport is constrained (by the designers of the Auckland Plan) to build no more arterial roadspace and to actively discourage automobility by such mechanisms as obstructions in roads, converting existing arterial roadspace into bus-only lanes, reducing intersection efficiency by moving stop-lines back, reducing roadside parking without providing replacement off-street parking, driving up parking prices, and provision for walking and cycling within the area paid for by vehicular road users, all to "encourage" (enforce?) use of public transport, walking or cycling, which for most purposes are inferior to car use, and unusable by certain sections of the public.

Regrettably, wholly commercial and wholly industrial traffic (ie vans, utes and trucks) are part of "general traffic" and efforts to date to separate them have (and will in future) prove mostly futile, as cars are mostly engaged in trips serving commercial and industrial needs as well as residential tripends. The end result of such "demonisation" and active discouragement of auto-mobility - which has "enabled" most of the economic growth over the last century - is that of socio-economic degradation, as is becoming everywhere apparent in Auckland. (If this actually achieved "environmental goods", one could understand if not support such a position, but it doesn't do that either, despite claims to the contrary.)

The inevitable consequence (unless the Auckland Plan proceeds to the point of irretrievably destroying the Auckland socio-economy, as it is well on the way to doing) will be the overturning of its anti-automobility (and anti-residential subdivision) positions, and the retrofitting of the arterial roadspace it currently actively discourages. That is, provision should be made - and proven feasible - in this proposal for south-to/from-west movements between SH1 and SH20 by direct intermotorway connections. The need for it will become irresistable in future, if there is to be a future for Auckland.

(b) NZTA: is primarily responsible for improving inter-access between nationally-disparate economic zones of concentrated economic activity - ports, cities, airports and (previously?) railheads, and access between them and their hinterlands. Inevitably, however, by providing access to areas of intensive commercial and industrial activity within cities, it attracts intra-urban traffic often linking residential areas with those intensive use zones. There is thus "overlap" between the needs of intra-urban and inter-urban traffic, resulting in one motorway network serving both functions. Initially, the long-term future network was apportioned between "primarily inter-regional" traffic as the responsibility of the (then) MWD, whereas those parts primarily serving intra-urban traffic were the responsibility (for design and funding) of local government.

(In the case of Auckland, that responsibility was initially laid on Auckland City Council by the 34 other local governments in the region (the submitter was the third (junior) of three engineers assigned to (then) ACC's Traffic and Motorways Department), then taken over by Auckland Regional Council when it was converted from a planning only agency to include for regional works before 1970).

<u>The situation today is thoroughly confused,</u> with conflicting ideologies at play, and lack of clarity on how they can be resolved other than on a case-by-case negotiation between the two parties:

- (i) NZTA is the lead planner/engineer of the project, but (in effect) has to obtain Auckland Transport (ie instigators of the Auckland Plan)'s approval of any proposal through Auckland Transport's "territory"
- (ii) The position of the Auckland Council (as protectors and advocates of the antiautomobility Auckland Plan) is that it would be best if no motorways were built, but if they have to be built through Auckland, cost is no object to ensuring that "social goods" labellable as "environmental" (tunnels, beaches, walkways, sculptures, separation landscape wildernesses, sound barriers) are incorporated. Its requirement for provision for local traffic has no rational basis, varying considerably from no provision at all (ie no interchange on SH20 at all to serve Unitech and the Rosebank peninsula, and no motorway provision to serve North Shore to West Auckland traffic through the Constellation Drive proposal) to full provision for local traffic at the expense of NZTA's "through" traffic (eg the East-West link through Te Papapa as currently proposed)
- (iii) NZTA is also strongly influenced by Ministry for the Environment's positions on development, which (a) favours environmental protection and enhancement (ie a return to a static "Garden of Eden" ideal) over economic development, while asserting that the two are compatible and can both be achieved together, and (b) unquestioningly accepts the thesis that the United Nations, on the advice of its own UNEP-hosted IPCC, can control climate, so long as all nations subscribe to (and pay for) it's governance of their energy use. CUTS holds that, while some accommodation of both is possible, this is too often achieved at substantially increased cost which is often unaffordable and results in increased per capita debt, already at a dangerous level.

The inevitable result:

- (i) Excessive, unnecessary and increasingly unaffordable cost of all transport projects in Auckland, including roading development projects, and any rail-based and separate busway public transport projects, For examples, see Appendix entitled "Auckland's Over-costly Transport Projects" (The costs and negative socio-economic impact of the 1984 national bankruptcy remain with us today, and have handicapped our ability to afford the amenities to which we believe we are entitled, including (a) the social welfare services to which we have become accustomed, eg student loans, middle-class welfare, superannuation at 65, affordable housing, more extensive "free" medical services etc etc. (b) the transport solutions (including adequate provision for automobility) we aspire to, (c) housing affordable to most classes of society (including for those with eg 20%ile incomes), (d) adequately maintained and extended infrastructures, including scholls, hospitals, pipes and wires), (e) environmental acquisitions, protections and enhancements.)
- (ii) growing motorway congestion, passed off onto city arterials as holding pens by the use of on-ramp signals.
- (iii) Irrational outcomes of disparate projects, some accommodating local traffic at the expense of through traffic, some the reverse, and some (hopefully including this project) accommodating both, while also substantially reducing the impact on adjoining communities (Hocket Association, Go-Kart people, pony club members both Rosedale and Wainoni) thus the cost of their relocations (if my proposed design is implemented)
- (iv) Sporadic achievement of world class standards (some very well indeed, some clumsily through lack of adequate skilled oversight, some poorly), but which are generally unaffordable by the new Zealand economy, exacerbating our indebtedness at a time when, as the Governor of New Zealand's Reserve Bank has repeatedly warned, such debt is dangerous in today's (over?)-indebted world. (refer (i) above).

Decision sought at Constellation:

- (a) Require consideration of CUTS' design proposal as a way of addressing all the concerns about impacts on local communities-of-interest listed above, and (my perception of) the North Shore public interest in "enabling" automobility generally.
- (b) Require provision later if not within this project for direct motorway to motorway 2-lane ramps between SH1 (south) and SH20,
- (c) Require assurance that such ramps will not be precluded by any first stage development, through the provision of drawings to the EPA as a condition of acceptance of any proposal for staged development.

Areas of concern include: (i) location of SH20 gores with respect to distance from on & off ramps between Constellation Drive (west) and SH20, (ii) vertical separation between north to west and west to south inter-motorway ramps, (iii) ability of west to south inter-motorway ramp to clear over the 3-lane Constellation Drive southbound on-ramp before ducking beneath the Sunset Road overbridge, (iv) ability of both west to south ramp and 3-lane SH1 southbound on-ramp from Constellation Drive to pass between the columns of the Sunset Road overbridge, (v) land is available (or could be made available by shifting the busway eastwards) for adequate separation between on-ramp merges for the southbound inter-motorway ramp and the Constellation Drive southbound on-ramp, (vi) space is available south of Sunset Road overbridge for widening of SH1 from two lanes to at least three lanes (and five lanes - 3 + 2 - where motorways merge). This may also require an eastwards shift of the busway; if so it is an expensive consequence of inadequate planning in previous years for which Auckland's (and New Zealand's) economy should not (IMHO) be made to suffer.

(d) Require sensible and cost-conscious (like, BCR) justification of any additional provision for pedestrians and cyclists beyond those already available.

(While pedestrian access must always be available for non-motorway properties (preferably not alongside motorways) the sort of long-distance walking and cycling proposed to be provided for is already available through local roads and arterials, and the sort of provision proposed seems to

require belief in the proposition "build it and they will come"; those who could come will very likely be a very specialised, age/desire constrained and small if not tiny (but well-organised) percentage of the population who do not pay for the specialised facilities being provided for them by the silent megamajority who pay their bills.)

FURTHER EXPLANATION: POSITION ON GREVILLE PROPOSAL:

<u>Position:</u> Similarly to the Constellation interchange, the proposal does no more than tinker with local needs for accessing and or bypassing the interchange, and addresses only the needs of inter-regional traffic. <u>In this case also, I oppose the development as proposed</u>, because it has not been irrefutably demonstrated with engineering drawings and proven feasibility that local needs can be at least accommodated in future by the addition of motorway-standard ramps linking SH1 (sth) directly to/from Albany Expressway beyond the Greville and Tawa arterial intersections (diagram to be provided in due course). <u>Such "proof"</u>, is an essential prerequisite for my "support-in-part" of the current proposal

Explanation: as with the Constellation interchange, busway extension is so close to the motorway as to restrict and possibly preclude the subsequent insertion of the southbound on-ramp from Albany Expressway. This would repeat Auckland Transport's current pre-disposition to spend all available funds for new development generated by the 96.2% of daily vehicular trips in private vehicles on that (current) 3.8% (future maximum of 5%) daily vehicular trips in public transport, leaving the former to continue congesting without relief.

My concern here is not so much for my own convenience as a (predominantly) car user, but for the general traffic – thus commerce, thus jobs, thus bankruptcy-avoidance – so "congested off the road". While some (in my opinion, a very small percentage) of such traffic could still occur using public transport, cycling or walking, it would mostly do so with much-reduced efficiency, and an unknown quantity of commerce (my assessment would be around 80%) would be prevented or diverted to less-convenient times of the day, resulting in reduced (net) betterment, ie reduced net wealth-creation.

Decision sought at Greville:

- (a) Require consideration of CUTS' design proposal (to be attached) as a way of addressing currently bad and worsening congestion primarily caused by the heavy Albany Expressway to SH1 southbound movement (and to a lesser extent the reverse northbound movement), which is by far the worst feature of the current interchange. The busway extension pales into insignificance in comparison, yet could well compromise interchange development in future.
- (b) If not included within the project (as NZTA currently proposes), require proof that the construction as proposed does indeed allow adequately for a subsequent direct 2-lane Expressway to SH1 motorway (southbound) flyover, and a similar 2-lane northbound flyover of the Tawa drive intersection with the Albany Expressway and Greville Road extension, without precluding existing motorway ramps (even if they require partial extension).

FURTHER EXPLANATION - OVERALL

The writer well recognises that the views expressed above are opposed to the globally-universalised conventional wisdom supporting the Auckland Plan (which derives from an American architect-driven approach to exclusive "cost-is-no-object" residential subdivisions

(source of the term "Urban Design"). Such "wisdom" was picked up by American town planners, unjustifiably labelled "sustainable planning" and formularised for application to whole cities, the resulting development being known there as "Smart (sic) Growth" and here as "Compact Cities":. When there is monopoly empowerment of such conventional wisdom with no competition for ideas, as now applies in Auckland, anything repeated often enough in the Mainstream Media becomes conventional wisdom, but, despite many claims that it does, that doesn't make it "good for the environment" – or for socio-economic "sustainability". One detrimental consequence is the development proposed.

This submission goes way beyond the scope normally expected by the EPA or held (by some) to be relevant to this hearing. But the submitter submits a true concern for the environment should encompass all considerations of which the proposal is an outcome. Implementing it as proposed will further cement Auckland's degradation with negative consequences for all environmental considerations. Questions on this would be welcomed.

DISECONOMIES OF THE NORTHERN BUSWAY

by David Willmott March 2017 < david@cuts.org.nz >

The design proposed for the Northern Corridor Improvements (February 2017) is a trade-off between controlling agencies; - NZTA gets to "complete the ring-road" (for northbound traffic only) at the cost of extending the Northern Busway. But the busway extension compounds the already "inefficient use of scarce (financial, material and energy) resources" resulting from the Auckland Plan's "designer city", in ways which greatly affect and concern home-seekers, travellers and commerce generally, and should also concern EPA.

The provision of a separate busway for Bus Rapid Transit is a "nice-to-have" luxury provided at general road user cost of the capital investment, and at artificially-reduced ticket prices (subsidised by ratepayers as well as general road users). Originally, ie before the advent of the automobile when few urban dwellers could afford a horse (quite apart from a trap and the 1/3 of all agricultural land required to feed and paddock the horses), bulk (collective) transport services were provided by entrepreneurs for the profits to be made.

When automobiles proved far more economic, attractive and safe than the runoff from horse excreta and the dead horses left for days on the roadside, public transport lost its attractiveness and its profits, and was taken over by local government, as a social service (for the not-yet-automobilised) and as a "fallback" for those whose automobiles were "temporarily inconvenienced". In general, local government operatives welcomed the opportunity to expand their "empires" unconstrained by commercial imperatives; losses could be passed off as charity and passed on to general ratepayers. Today, those subsidies extend to the "free" assignment of motorway land and arterial road-space paid for by private sector road users. Add to that the capital cost of creating busways, cycle lanes, and rail transit expansions, plus further subsidies with which to bribe downtown workers (not known for their poverty) to use public transport, and downtown property owners are laughing all the way to the bank.

Refusing to address the road congestion arising from population – thus traffic – growth, densification and enforced re-centralisation, coupled with prohibitively expensive and restrictive parking policies, is today known to transit managers as "creative congestion". Yet these people are paid by over 95% of travelling ratepayers for whom even substantial subsidisation of transit does not overcome their preference for automobility to most

efficiently effectively and comfortably meet their own wants and (for many, essential) needs, not those of a priviledged and tiny minority who happen to live within easy walking distance of a frequent-enough bus or train stop and also happen to work downtown. And congestion is most certainly "unaddressed" when virtually none of Auckland's substantial transport budget is spent on provision of additional general purpose arterial roadspace.

As regards the (so-called) "success" of the Northern Busway, one can stand on the Akoranga overbridge any peak hour and wait for around five minutes for a bus to pass, while alongside the motorway users grind along in congestion (using up to four times as much fuel per km as freeflow at 70kph) caused when widening the motorway is precluded by its own user-bought-and-paid-for expansion land being allocated instead to the busway. Of course, those whom the busway benefits, including transit managers, think (and regularly proclaim to a compliant media) it is a wonderful contribution to Auckland mobility, even 'though around 200 extra vehicles could fit between successive buses. ("A bus replaces 50 cars" applies only when and where the bus is full and sharing general purpose roadspace with other vehicles.) Even in the peak hour approaching the harbour bridge, the busway carries less than a quarter of the people carried by an equivalent in-out pair of motorway lanes, and the imbalance is far worse outside peak hours and/or nearer the outer terminus. So much for economy, efficient use of scarce ratepayer (and taxpayer) funds, and a duty of care to spend those funds wisely.

Today, when the "social service" and "breakdown backup" justifications for public transport have lost most of their validity, and transit users include wealthy city workers with cars in their garages back home, justification (as if this were the role of public "servants") has swung around to include demonization of automobility, "saving the planet", "reducing congestion" (but see above; also, even immediate directly comparative reductions amount to less than 3 months growth of general traffic; any hiatus in that growth while population is rising is caused by a decline in commerce, productivity and wealth-creation), and "overcoming peak oil" (even 'though the average (day-long) bus uses every bit as much energy per person-km delivered as does the average car (engines are designed to pull full vehicles, and buses, on average day-long, have a load factor about a quarter that of the average carload), and any form of rail transit, day-long, uses considerably more energy than both cars and buses).

But rather than current planning reducing congestion, it is exacerbated by the usurpation of existing arterial road-space for the likes of bus-laneing and cycle lanes, together with no additional roadspace being provided for a growing population — "its too hard", "there is no room left (only room for forced re construction and densification of existing landuses)", "no money" (unless you give us an extra \$14 billion - on top of the overblown cost of most of NZTA's Auckland urban projects being forced into ludicrously-expensive tunnels or being expensively (and, for most, unaffordably) engineered and landscaped to meet Council's demands). Most foolishly ignorant of all, "why build roads; they only fill up with traffic". And despite the denigration and unprovision of additional arterial roadspace, trips-to-work are artificially lengthened, by forcing re-centralisation against all "natural" (economic) social and economic forces driving decentralisation of jobs to sub-regional centres, where they are closer to suppliers, tradesmen, customers and workers; thus travel times & costs, congestion, and emissions are lower, and parking is more easily available.

Such centrally-planned de-emphasis, indeed active discouragement, of automobility (thus also of vans, utes and trucks), is a degradation of the efficient inter-accessibility on which

commercial productivity depends. It obstructs the primary purpose of cities; to more easily enable commerce between mutually benefitting thus consenting adults. (Cities DO NOT exist primarily to "save the planet"; that is best left to the comparative wisdom, self- and family-bettering aesthetic and other values (given their preferred affordabilities and financial resources) of the people paying the bills. After all, the Thames, London pea-soup fogs, and smog days in LA were all cleaned up as soon as such could be afforded, all without an RMA

In the absence of any major improvement in the other factors of productivity, the economic consequences of Auckland's (would-be) "planet-saving" designer city, including the proposed development, can only be reduced economic vitality, ongoing job losses, a continuation of our long-term escalation of per capita debt, and increased exposure to the sort of financial collapse such as we experienced in 1984, and Brazil is experiencing today. Only next time it could be very much worse, as most other nations are in the same bind; witness the general financial collapse of 2008, lessons from which New Zealand – and the world - has (to date) refused to learn.

These "natural" (economic) forces reduced downtown jobs as a percentage of all urban jobs from 50% immediately after WWII to around 10% today, and still falling despite the abortive and very expensive focus on "encouraging" (expensive) premature densification and recentralisation. Supposedly, this is so that planners, using other people's money, choices, property, lives and lifestyles can "create" (ie take credit for enforcing premature aesthetics-based reconstruction of) a "world class (designer) city", while also "making Auckland more liveable" than nature enables, but in reality (ab)using their enviro-planning power to focus on impressing tourists at the expense of meeting the wants and needs of their ratepayers, ie the ratepayers' own affordability and "liveability".

It is no accident that Auckland Council has already reached its (government imposed, and government relaxable) debt limit, nor that the current government's debt has grown from \$8 billion at the 2008 election to almost \$80 billion today, or that per capita debt (including private debt) has grown to around 170% of GDP; one of the worst performances in the western world. So much for a "rockstar" economy.

In fact, the northern busway aids the achievement of none of the above enviro-planner goals; instead, it can be persuasively argued – and indeed proven to the satisfaction of any open-minded rational and educated person (without a vested interest) that its effects include:

- (i) ... increased motorway congestion through usurping its expansion (which concerns CUTS greatly on behalf of our economy, and should (in CUT's submission) concern the EPA)
- (ii) ... driving up energy consumption per person-km delivered, day-long, as exacerbated by consequential congestion of adjacent motorway, and by longer trip-lengths through densified traffic imposed by enforced re-centralisation. (Increased energy consumption concerns CUTS only as regards cost; there is no such thing as the "peak oil" theory as hypothesised by ill-educated people and supported by vested interests four times since 1895. After all, carbon is the 15th (of 78) most prolific of planet earth's elements and their compounds and it is a combustible (oxygen-combining, CO2-producing) fuel in most of those carbon compounds. Those carbon compounds can be formed biologically or through natural synthesis; whichever, they and CO2 exist in quantities far in excess of any human requirement or effect. Moreover, they are the very stuff of life itself; flora release oxygen from carbon compounds while

fauna maintain a balance by reversing the process. Imbalances occasionally occur, but they are "short-term", being "corrected" by growth in the other form of life; current growth inP the atmospheric CO2 reflects out-gassing from warming oceans (which in turn gain most of their CO2 from fumaroles of cooked subducted shale.) FAO records show a net gain in afforestation (and food-production) stimulated by higher CO2 levels in the atmospPhere; CO2 is a plant fertiliser, not a toxic gas. In dinosaur days, CO2 concentrations were some 15 times current atmospheric concentration (without runaway global overheating and fauna fry-ups, providing fast food growth in balance with gigantic consumers. Whatever, any careful research via the internet*** reveals the ubiquity and effective inexhaustibility of carbon fuels. Only those blinded by the proclamations of scarcity by the ignorami or those with vested interests believe that burning carbon fuels in vehicle engines will exhaust resources; for the rest, AGW offers the alarm that would-be global wealth-redistributors need to warrant their control of energy use)

- (iii) ... driving up CO2 production per person-km delivered, day-long, as exacerbated by consequential congestion of adjacent motorway, and by longer trip-lengths through densified traffic imposed by enforced re-centralisation (note the absence of any real consequential problem (eg human-driven climate change) as outlined in (ii) above)
- (iv) ... reduced efficiency of financial resource allocation by incentivising use of transit. (A basic social transport service for those unable to afford or use a car is most economically (thus environmentally) provided with call-up door-to-door taxis or multi-user vans using arterial routes along with other traffic, and not by presuming public transport should be subsidised for the less fortunate members of our society)

Refer Appendix "Transport Exhausts Don't Warrant Command and Control of Land Use"

*** The curious could do worse than viewing Nobel Prize-winning physicist Iver Glaevar's half-hour address on You Tube entitled "Nobel Laureate Smashes the Global Warming Hoax" (Jul 12, 2015)

Attachments hereto:

- Concept sketch of CUTS-proposed Constellation and Paul Matthews interchanges
- Concept sketch of CUTS-proposed Greville interchange
- Letter of support from Greenhithe Residents Association
- Agenda 21's 17 principles (annotated) (Agenda 2030 similar, but even more controlling)
- "Ahwahnee Principles" (which characterise "Smart (sic) growth" aka "Compact Cities")
- Essential elements of "Smart (sic) Growth" aka "Compact Cities" (ie the Auckland Plan)
- "Lone Mountain Compact" (compared with the <u>idealistic</u> Ahwahnee Principles, a <u>realistic</u> interpretation of how cities should be managed to "enable" human flourishing with attendant economic, social AND environmental improvements.)
- "Environmental effects" of the project as proposed (including Diseconomies and environmental degradation resulting from the Northern Busway restricting the growth of that 95% of all vehicular urban traffic which will (mostly) not occur if sufficiently discouraged from doing so, resulting in loss of commercial activity and the betterment which flows from it.)