

27 June 2022

Ross Copland
Chief Executive
Te Waihanga NZ Infrastructure Commission

Email: s 9(2)(a)

Dear Ross,

Following ongoing communication, beginning in April 2022, between Let's Get Wellington Moving (LGWM) and Te Waihanga I would firstly like to thank you for doing your review at such short notice.

We welcome your review and feedback. As we progress the programme of work, we would like to close the review out as we move into completing the Transformational Programme Indicative Business Case and the scoping of the Detailed Business Case phase. An important factor to note is that the current preferred option decision is part of the Indicative Business Case¹ phase which limits a lot of detailed work and definition of what is proposed.

As per our communication, the LGWM Programme requested a review of Carbon and Economic assessment methodologies by Te Waihanga based on information supplied on 1 May 2022, and Te Waihanga supplied a response on the 10th of May 2022.

The inputs and ideas presented by Te Waihanga are very much appreciated, as has been discussed and outlined in subsequent communication. Your feedback has certainly shaped and sharpened our thinking as we begin shifting to the Detailed Business Case work. That said, LGWM needs to consider and optimise the preferred option across all the programme objectives (not just carbon, although it is very important) also covering liveability, mode shift, access, resilience and safety.

Further, while sharpening and shaping our thoughts on Carbon and Economics we believe that it is important to clearly set out those areas where we would challenge some of the assumptions and thinking that have shaped Te Waihanga's analysis and conclusions.

¹ The indicative business case provides decision-makers with an early indication of the preferred way forward for high value and / or high-risk investment proposal. The information presented is indicative only. It provides the decision-makers with just enough information to consider change and agree the short-listed options for further analysis, or to decide not to proceed with the project, before too much work is done." Better Business Case Indicative Business Case Guidance (Sept 2020).

This is largely to provide key stakeholders and the public with the necessary context to accurately assess decision-making within the programme as we progress to the Detailed Business Case. These are set out in detail in the review track sheet, which has been shared with your team previously.

Without necessarily limiting the details of this feedback, we see three broad areas where we would challenge the conclusions reached by Te Waihangā:

1. LGWM alignment with Net Zero Carbon targets and Te Waihangā's Rautaki Hanganga / Infrastructure Strategy:

LGWM supports the Government's goal of achieving zero net greenhouse gas emission by 2050 and welcomes the climate change recommendations and guidance as set out in Te Waihangā's Infrastructure Strategy.

In noting this, the LGWM Indicative Business Case was commissioned before Net Zero target was established in legislation, and before the Commission published its strategy. Hence, criticism that the LGWM programme is misaligned to the Net Zero target and the Infrastructure Strategy's climate change guidance are misplaced, when they are clearly out of the original scope.

Nevertheless, the LGWM programme is closely aligned to the broader outcomes that the Net Zero target seeks to achieve, with Option 1 and Option 2 both achieving net zero reductions from 2055 onwards. In addition, there is significant scope to reflect the guidance from the Commission going forward (such as congestion charging).

2. Factoring in urban density changes when assessing LGWM investment options

We recognise and acknowledge the analysis of the Carbon and Economic assessment methodologies. However, in reaching the conclusion that Option 4 is the highest performer for carbon reductions under the core (current) land use scenario, we feel the Commission has unweighted the role of urban intensification in achieving LGWM's dual objectives of encouraging mode shift and to develop greater public and active transport options.

Greater land use intensity is critical to achieving these objectives, and Options 1 and 2 are more likely to achieve realisable higher land intensity than Option 4. We note your concerns around the certainty of the land use and urban intensification changes required under each option, and while these are again outside the original scope of the project, are matters that can be subsequently addressed.

3. Congestion charging

We also note your comments about congestion charging. Travel behaviour change is part of the programme, but congestion charging was out of scope. Notwithstanding, we have done high level analysis and have committed to work on feasibility. However, we recognise that the Programme still needs investment in alternatives to cars to be equitable.

In setting out this context, let me assure you that we are committed to ensuring that we are making decisions within this programme that are best aligned to the wellbeing outcomes of all New Zealanders.

The Preferred Programme Option Report (PPOR) and recommendations will be available publicly once they are released for Council decision making (this could be as early as Wednesday 29 July). This will include background material including a full peer review that has been undertaken by Derek McCoy, and we propose to include the Te Waihangā review (we understand you have an OIA request for your review and suggest that we coordinate release). We would also be happy to provide a briefing/workshop for Te Waihangā on the PPOR once the full report is released.

As always, the LGWM team remains available to discuss our feedback in detail, and I welcome Te Waihangā's ongoing involvement in the programme as we seek to deliver a fit-for-future transport system for Wellington that meets our climate change commitments.

If you have any further questions, please do not hesitate to contact me on s 9(2)(a).

Yours sincerely



Dave Brash

Independent Chair of Let's Get Wellington Moving Independent Partnership Board