



## **ALL ABOARD AOTEAROA**

### **Submission on the Draft Regional Land Transport Plan**

#### **Request for opportunity to be heard**

1. All Aboard Aotearoa requests the opportunity to be heard in person by the Regional Transport Committee on the Committee's legal duties in relation to the Regional Land Transport Plan (**RLTP**).

#### **Summary**

2. All Aboard Aotearoa is a coalition of climate and transport advocacy groups, including Generation Zero, Bike Auckland, Movement, Women in Urbanism, Greenpeace, Lawyers for Climate Action NZ Inc, among others. All Aboard Aotearoa is calling for decarbonisation of transport by 2030 because we see this as the best way for Tāmaki Makaurau to contribute to the global effort to limit warming to 1.5 degrees Celsius above pre-industrial levels. Decarbonisation should be achieved by reducing reliance on private vehicles and investing in public transport, active transport, and a compact city.
3. Our primary submission is that the draft RLTP does not comply with the law and must be entirely overhauled. The law requires that the RLTP be "in the public interest". What the public interest requires is clear: halving our greenhouse gas emissions by 2030 and reaching net zero by 2050. The Council has declared in Te Tāruke ā Tāwhiri (Auckland Climate Plan) that achieving this requires a 64% decrease in transport emissions by 2030, from 2016 levels.<sup>1</sup>
4. Rather than providing for this necessary reduction in transport emissions, the draft RLTP provides for transport emissions to *increase* by 6% by 2031, or, at best, reduce by 12% if the Government makes certain policy interventions. The draft RLTP is therefore plainly not in the public interest. It is no exaggeration to say that the public would be harmed by the implementation of this RLTP.
5. We urge AT and the Council to comply with the law and create a RLTP that achieves the necessary reduction in transport emissions. If this requires the Council to liaise with the Government on ATAP, then that is what must happen. If AT and the Council do not produce a RLTP that achieves the necessary emissions reductions, All Aboard Aotearoa will issue legal proceedings.

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<sup>1</sup> Auckland Climate Plan, p. 52.

6. Now is the time for action. The people whom you serve are counting on you to get this right.

### **Legal requirements for the RLTP**

7. AT's statutory purpose "is to contribute to an effective, efficient, and safe Auckland land transport system in the public interest".<sup>2</sup> AT must act in accordance with its statutory purpose. This means that, in preparing the RLTP, AT must "contribute to an effective, efficient, and safe Auckland land transport system in the public interest".<sup>3</sup>
8. In addition, before the RLTP can be approved, the regional transport committee must be satisfied that the RLTP contributes to the purpose of the Land Transport Management Act 2003, that purpose being "to contribute to an effective, efficient, and safe land transport system in the public interest".<sup>4</sup>
9. The Council has made clear what is in the public interest: a 64% reduction in gross emissions from transport by 2030, compared to 2016 levels.<sup>5</sup> The Council has decided that this is necessary to achieve its "core goal" of reducing emissions by 50% by 2030 and reaching net zero emissions by 2050.<sup>6</sup>
10. This reduction in emissions is of such public importance that the Council has declared a climate emergency.<sup>7</sup> The Council has also signed the Local Government Leaders' Climate Change Declaration in which it has committed to "develop and implement ambitious action plans that reduce greenhouse gas emissions".<sup>8</sup> The Council has promised that "these plans will: promote walking, cycling, public transport and other low carbon transport options".<sup>9</sup>
11. The Council has spelt out what actions it must take to achieve the necessary reduction in emissions. In short, it must: "encourage a shift to public transport use, walking and micro-mobility devices, rather than driving".<sup>10</sup> The Council has said it will take the following actions to deliver on this:<sup>11</sup>
  - "reduce private vehicle travel";
  - "make travelling by public transport more appealing than using personal vehicles";
  - "make travel by public transport faster, more frequent and reliable over a wider network";

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<sup>2</sup> Local Government (Auckland Council) Act 2009, s 39.

<sup>3</sup> Preparing the RLTP is one of AT's statutory functions: Local Government (Auckland Council) Act 2009, s 45(a).

<sup>4</sup> Land Transport Management Act 2003, ss 3, 14(a)(i).

<sup>5</sup> Auckland Climate Plan, p. 52.

<sup>6</sup> Auckland Climate Plan, p. 7.

<sup>7</sup> [https://infocouncil.aucklandcouncil.govt.nz/Open/2019/06/ENV\\_20190611\\_MIN\\_6851\\_WEB.htm](https://infocouncil.aucklandcouncil.govt.nz/Open/2019/06/ENV_20190611_MIN_6851_WEB.htm).

<sup>8</sup> Local Government Leaders' Climate Change Declaration 2017.

<sup>9</sup> Local Government Leaders' Climate Change Declaration 2017.

<sup>10</sup> Auckland Climate Plan, p. 85.

<sup>11</sup> Auckland Climate Plan, pp. 82-85.

- “prioritise investment along congested corridors and expand Auckland’s Rapid Transit Network”;
- “increase access to bicycles, micro-mobility devices and the safe, connected and dedicated infrastructure that supports their use”;
- “accelerate investment in dedicated cycleways”;
- “improve access to public transport hubs”, among others.

12. The regional transport committee must also be satisfied that the RLTP is consistent with the Government Policy Statement on land transport.<sup>12</sup> The Government Policy Statement calls for reduced transport emissions by 2031 through mode-shift, i.e. increasing the share of people’s travel by public transport, walking or cycling.<sup>13</sup> This requires a “rapid transition to a low carbon transport system”.<sup>14</sup>

13. More generally, the Council has the legal obligation to work for the benefit of future generations:

- a. The Council’s statutory purpose is to “meet the current and future needs of communities for good quality local infrastructure” which means “infrastructure and services that are efficient, effective and appropriate to present and anticipated future circumstances”.<sup>15</sup> As a public body, the Council must act in accordance with its statutory purpose.
- b. When making any decision, the Council must act in accordance with the following principles:
  - i. The Council “should take account of the interests of future as well as current communities” and “the likely impact of any decision” on environmental wellbeing, as well as social, economic and cultural wellbeing.<sup>16</sup>
  - ii. The Council “should ensure prudent stewardship and efficient and effective use of its resources in the interests of its district or region, including by planning effectively for the future management of its assets”.<sup>17</sup>
  - iii. “In taking a sustainable development approach, the Council should take into account: the social, economic, and cultural wellbeing of people and communities; the need to maintain and enhance the quality of the environment; and the reasonably foreseeable needs of future generations”.<sup>18</sup>

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<sup>12</sup> Land Transport Management Act 2003, ss 3, 14(a)(ii).

<sup>13</sup> GPS dated September 2020, p. 22.

<sup>14</sup> GPS dated September 2020, p. 22.

<sup>15</sup> Local Government Act 2002, s 10(2) (emphasis added).

<sup>16</sup> Local Government Act 2002, s 14(1)(c) (emphasis added).

<sup>17</sup> Local Government Act 2002, s 14(1)(g) (emphasis added).

<sup>18</sup> Local Government Act 2002, s 14(1)(h) (emphasis added).

14. The foregoing purpose and principles plainly entail the Council acting in a manner that will achieve the required emissions reduction, as called for in its own Climate Plan.
15. Finally, as a consequence of its own declarations, plans and policies to significantly reduce emissions, in particular by encouraging a mode-shift away from driving, the Council has created a legitimate expectation on the part of Auckland residents that the Council will take action to do this, including by providing for it in the RLTP. Auckland residents have relied, and continued to rely, on the Council to do this. Legitimate expectations can be legally enforced against Councils.<sup>19</sup>
16. In summary, the law is clear: the RLTP must provide for a swift and substantial reduction in transport emissions, consistent with the Government Policy Statement, the Council's Climate Plan and the public interest generally.

### **The draft RLTP breaches AT and the Council's legal obligations**

17. The draft RLTP does not contribute to an "effective, efficient, and safe land transport system in the public interest", as the law requires.<sup>20</sup> This is because the draft RLTP provides for a 6% increase in transport emissions by 2031, or, at best, a 12% decrease if the Government makes certain policy interventions.<sup>21</sup> Rather than encouraging the mode-shift away from driving the Council has declared necessary, the draft RLTP provides for private vehicle trips and vehicle kilometres travelled to increase.<sup>22</sup>
18. The draft RLTP thus fails every legal requirement: the transport system it proposes is neither effective, nor efficient, nor safe and plainly not in the public interest. Nor is it consistent with the Government Policy Statement on land transport. It is no exaggeration to say that the public would be harmed by the implementation of this RLTP.
19. AT, in preparing the draft RLTP, has thus breached its obligations and acted contrary to its statutory purpose.<sup>23</sup> The draft RLTP is incapable of approval, as a matter of law. No regional transport committee could possibly be satisfied that the RLTP contributes to an effective, efficient and safe land transport system in the public interest, or that it is consistent with the Government Policy Statement on land transport.<sup>24</sup>
20. The draft RLTP states that it has been informed by ATAP.<sup>25</sup> As the document rightly acknowledges, this does not replace AT and the Council's statutory obligations in relation to the RLTP.<sup>26</sup> The RLTP must comply with the law – specifically, "contribute to an "effective, efficient, and safe land transport system in the public interest" – regardless of what ATAP

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<sup>19</sup> *Hauraki Coromandel Climate Action Inc v Thames-Coromandel District Council* [2020] NZHC 3228 at [31].

<sup>20</sup> Land Transport Management Act 2003, ss 3, 14(a)(i).

<sup>21</sup> Draft RLTP, p. 65.

<sup>22</sup> Draft RLTP, p. 64.

<sup>23</sup> Local Government (Auckland Council) Act 2009, s 39.

<sup>24</sup> Land Transport Management Act 2003, ss 3, 14(a)(i).

<sup>25</sup> Draft RLTP, p. 85.

<sup>26</sup> Draft RLTP, p. 85.

says. AT and the Council are required to do what is necessary to produce a compliant RLTP. If that means that the Council must liaise with the Government, or that ATAP requires revision, then that is what must happen.

### **Necessary changes to the RLTP**

21. There must be a fundamental change in the philosophy that appears to underpin the draft RLTP – the preservation of driving. While the draft RLTP identifies walking, cycling and public transport as important, the substantial funds that it allocates to roading projects will continue to induce traffic and undermine any mode-shift.
22. For that reason, the RLTP requires a complete overhaul. Below we set out some more specific changes that we consider are required.

### ***Vehicle kilometres travelled must be reduced***

23. The draft RLTP does not attempt to reduce traffic volumes but instead forecasts for them to continue to rise. This must be changed.
24. Total road transport emissions are a product of vehicle kilometres travelled (VKT) and average vehicle CO<sub>2</sub> emissions per kilometre. The draft RLTP plans to rely on the uptake of electric vehicles to reduce the average CO<sub>2</sub> emissions per kilometre. However, as the draft RLTP acknowledges, the adoption of electric vehicles will not happen quickly enough to achieve the necessary reductions in transport emissions. Therefore, reducing VKT is critical for reducing total CO<sub>2</sub> emissions.
25. We believe an initial target of at least a 7% reduction in VKT per annum is required. This should be adjusted annually to ensure that Auckland's various carbon emissions reductions commitments are met. One early commitment is the C40 requirement that "in 2024, city remains on track to deliver its climate action plan."<sup>27</sup>
26. The RLTP makes some important observations:<sup>28</sup>

The proportion of distance travelled in private vehicles on a weekly basis (around 90 percent) is significantly higher than what we see during the traditional peak period journey to work commute. This is because trips outside peak periods are for a different purpose. They are often social, business and personal trips, are more distributed, generally involve multiple locations, passengers or moving goods, and on average, are longer. They are also less affected by congestion or parking and are harder to serve with public transport.

This means that the traditional transport planning, investment and monitoring focus on peak period trips (typically with congestion in mind)

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<sup>27</sup> [https://infocouncil.aucklandcouncil.govt.nz/Open/2021/02/ECC\\_20210211\\_AGN\\_10132\\_AT.htm](https://infocouncil.aucklandcouncil.govt.nz/Open/2021/02/ECC_20210211_AGN_10132_AT.htm).

<sup>28</sup> Draft RLTP, p. 23.

must be broadened to tackle distance travelled across the day and week and year. It's estimated the proportion of kilometres travelled in the non-peak periods make up 67 percent of all kilometres travelled on the Auckland roading network.

27. Congestion is not a driver for mode-shift in the non-peak periods, and we do not want it to become one. There are many other ways to reduce vehicle travel in non-peak periods:

LEVERS for adjusting vehicle km travelled

WRONG DIRECTION - INCREASES TRAFFIC	LEVER	RIGHT DIRECTION - DECREASES TRAFFIC
Increase Road Capacity	Road Capacity	Decrease Road Capacity
Retain vehicle priority on all streets	Street Layout	Use Low-Traffic Neighbourhood layouts
Retain extensive general traffic amenity	Circulation Plan	Restrict general traffic as required to prioritise sustainable travel
Widen intersection space for vehicles	Intersections	Reduce intersection space for vehicles
W&C Budget Insufficient	Walking and Cycling	Invest in W&C Infrastructure
Decrease Safety	Safety	Increase Safety
Increase Parking Free or Cheap Parking	Parking	Reduce Parking Price Parking
Decrease Road Pricing	Road Pricing	Increase Road Pricing
Decrease Public Transport Infrastructure	Public Transport Infrastructure	Increase Public Transport Infrastructure
Increase Public Transport Fares	Public Transport Fares	Decrease Public Transport Fares
Decrease Public Transport Quality	Public Transport Quality	Increase Public Transport Quality
Sprawl	Land Use	Intensify
Decrease vehicle costs, or hold them steady in the face of steady car advertising	Vehicle Costs such as registration fees	Increase vehicle costs
Evaluation Methods Using Old Models	Land Use and Transport Evaluation Methods	Evaluation Methods Best Practice



28. The draft RLTP does not use enough of these levers to reduce vehicle travel; if anything, the draft RLTP will serve to increase vehicle travel:

- The draft RLTP should provide for reduced parking. Instead, it commits \$50 million to new and extended park and ride facilities.
- The draft RLTP commits significant investment to increasing road capacity and “network optimisation”, which will only serve to induce additional traffic volumes.
- The increases in traffic caused by adding road capacity and “optimising” road networks will undermine any mode-shift to walking, cycling and public transport improvements.

29. In short, the RLTP must provide for a reduction in VKT. This is an essential component of reducing total road emissions and encouraging mode-shift.

**Electric vehicles pose equity issues and are only part of the solution**

30. Electric vehicles can be part of the decarbonisation solution, but not at the expense of mode-shift, and only if policy addresses equity issues. The draft RLTP relies too heavily on uptake of electric vehicles and does not address the equity issues associated with them.

31. Some of the actions in this table shown in the draft RLTP<sup>29</sup> are inequitable (given electric vehicles are not accessible to those on low incomes) and will have negative effects on mode-shift (because they encourage parking and thus induce driving, for example).

**Proposed actions and responsibilities**

INTERVENTIONS	ACTIONS TAKEN
Parking benefits: such as exemptions or reductions on parking fees or time limits; preferential parking access; and wait-list priority on long-term parking.	AT (2018-): 48 dedicated EV parking spaces (with chargers).
Support additional public chargers: such as the provision of public chargers or making land available for public chargers.	AT (2018-): 50 public EV chargers. Other (as at August 2020): ~80 public EV chargers.
Public charger navigation: such as physical signage or digital tools to locate public chargers.	AT (2020): limited information on AT public chargers.
Charging benefits: such as free or reduced fees for public charging; monthly flat-rate charging for heavy users, including car-sharing, ride-share, and taxi companies.	AT (2018-): free charging at 50 chargers. AT (2020): providing electricity supply infrastructure for 21 car-share chargers.
Infrastructure use and access benefits: such as access to bus and other restricted lanes; reductions or exemptions on road tolls and congestion charges.	Waka Kotahi (2017-2018): access to bus lanes at selected State Highway 1 on-ramps. AT (2030): Zero-emission Queen Street Zone (within Access for Everyone programme).

32. We oppose giving electric vehicles access to bus lanes at state highway on-ramps. This has already been researched and found to have no effect on electric vehicle uptake: "*The ability to access priority lanes didn't have any significant impact on peoples' decision to buy an EV.*"<sup>30</sup>

33. We also oppose providing parking benefits to electric vehicles: the public supply of parking must only cater to mobility parks or otherwise be priced to ensure that they are only used when truly necessary.

<sup>29</sup> Draft RLTP, p. 48.

<sup>30</sup> <https://www.newshub.co.nz/home/new-zealand/2018/09/priority-lane-trial-for-ev-drivers-flops.html>

34. Any money spent on encouraging electric vehicle uptake is better spent on mode-shift away from driving, so we do not agree with the \$34 million price tag (*"To tackle these barriers \$34 million has been allocated to support the uptake of EVs by Aucklanders, which is expected to complement Central Government initiatives."*).<sup>31</sup>

**Renewals and road network optimisation budgets needs to be re-allocated to low-carbon transport**

35. The draft RLTP commits very large sums of money to road maintenance, operations and renewals:

- State highway maintenance, operations, and renewals: \$1.862 billion;
- Renewing AT's transport network and corporate assets: \$3.931 billion.

36. This needs a complete overhaul. To use this budget to build "like for like" is to lock Auckland into increasing traffic volumes and increasing emissions.

37. The draft RLTP says that emissions cannot be reduced without government policy to increase electric vehicle uptake and biofuels. We fundamentally disagree with this proposition. Emissions can be reduced quickly and cheaply by re-allocating existing roading to cycling and walking. Cycling and walking do not damage road surfaces the way motor vehicles do, leading to lower renewals costs over time.

38. The renewals budget can also be reduced by separating the light modes from the heavy ones, giving the light modes plenty of space. Space used by light modes does not need such frequent renewal.

39. Further large sums are proposed to be spent on "optimisation" projects aimed at keeping vehicles flowing:

- Network Performance \$138 million;
- Intelligent Transport Systems \$52 million;
- Freight Networks Improvements: \$30 million;
- ITS Programme & State Highway Optimisation Programme: \$122 million.

40. Some of these optimisation projects work against our climate goals. They will create congestion at pinch points around the network by making driving more attractive. Therefore, the road network optimisation budget needs to be reconsidered.

41. If we cannot reduce the optimisation budget we can at least use it to improve safety, reduce emissions and help transform the transport system away from car dependence. In particular, we suggest that:

- Traffic incidents on motorways should be managed to minimise interruption to any public transport services operating on the motorway. There are two solutions. If shoulders are being used for bus lanes, then they should not be used for

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<sup>31</sup> Draft RLTP, p. 48.



breakdowns. Likewise, if shoulders are used for breakdowns, motorway lanes need to be reallocated to bus lanes.

- Vision Zero training for motorway operations teams should ensure they contribute to healthy discussions about ways to make on- and off-ramps risk-free for people walking and cycling past them.
- Vision Zero training for AT street network operations should ensure, for example, traffic signal incident responses are focused on keeping vulnerable road users of all ages and abilities safe at all times. Currently AT prioritises responses to incidents that affect drivers and leave issues that affect pedestrian safety in a state of malfunction, sometimes for weeks.

### **Capital works**

42. Capital works, regardless of the programme, should not include:

- Increases in driving capacity;
- Intersection widening for extra driving lanes;
- Intersections with [missing pedestrian legs](#),<sup>32</sup>
- Intersections with slip lanes;
- Missing safe cycling infrastructure;
- Walking infrastructure that doesn't meet the minimum standards laid out in the AT Transport Design Manual.

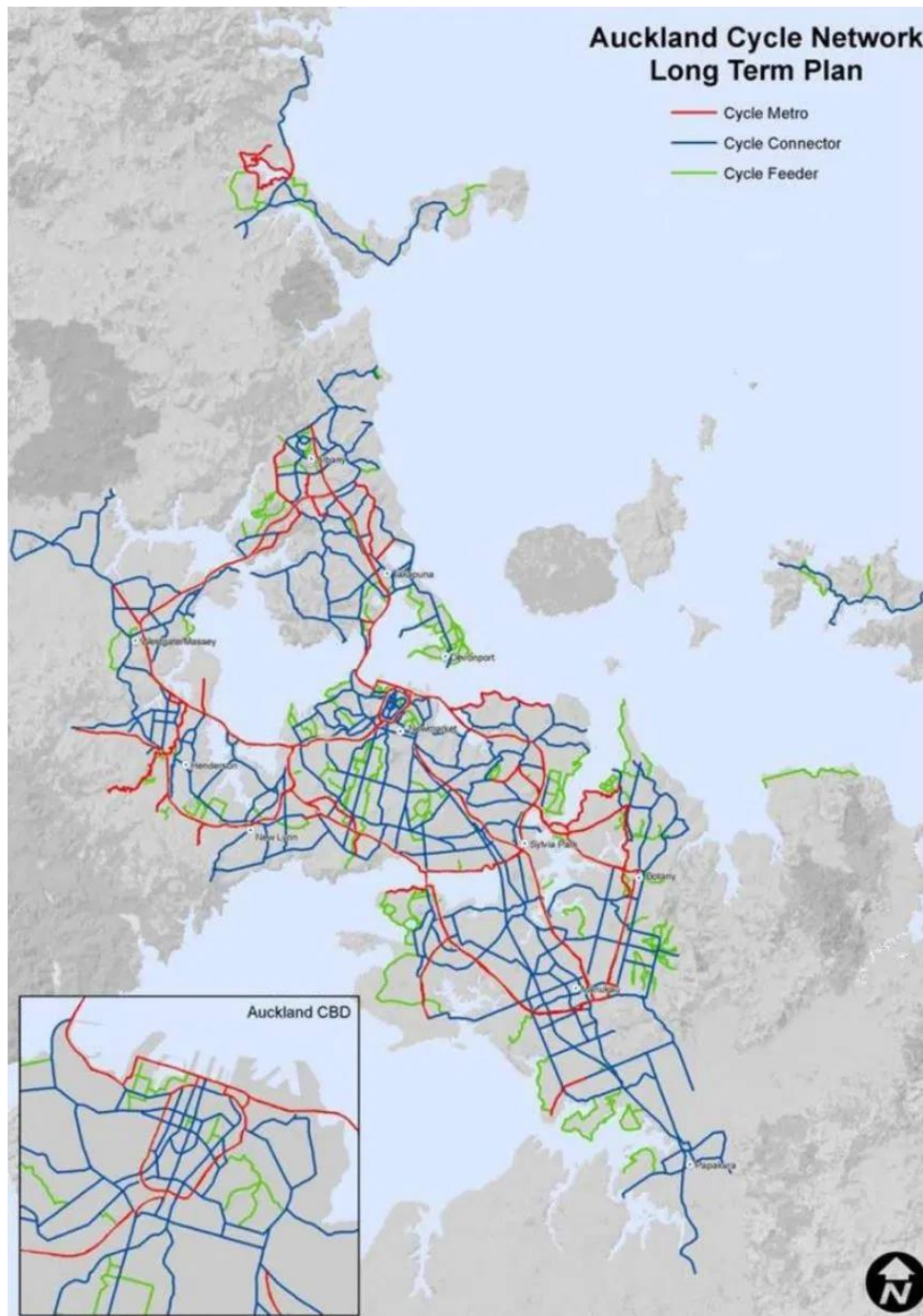
43. An immediate halt should be called to all projects that include any of these, regardless of their stage, followed by a full re-assessment of whether the projects are compatible with the programme required to deliver the Auckland Climate Plan. Projects underway may need to be converted to cycle lane or bus lane projects. Allowing contracts to continue that we know are unsafe or will increase emissions is unacceptable.

### **Implement the Auckland Cycling Network as a priority**

44. The Auckland Cycling Network was approved by Auckland Council in 2012.

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<sup>32</sup> <https://www.greatauckland.org.nz/2019/11/28/legless-crossings/>.



45. Seventy percent of this network was meant to have been delivered by 2020, with the remaining thirty percent delivered by 2026. Today, only a fraction of this has been delivered.
46. This full Auckland Cycle Network should be completed in the first half of the decade, so its completion date is as originally intended. The rapid rollout of pop-up cycling infrastructure in Europe as a response to covid-19 showed us that this can be implemented quickly, be done in a cost-effective way, and lead to cost-effective permanent solutions. Implementing the Cycle Network is not expensive, particularly if existing road capacity is re-allocated.

There are plenty of roading projects that should be cancelled (e.g.: Mill Road) to fund the Cycle Network, and the benefit to Auckland would be enormous. We simply cannot ignore the enormous improvements in rapid cycling network rollouts at minimal cost (e.g. 9,500 Euros per km for protected cyclelanes - not painted lanes<sup>33</sup>) that have been developed elsewhere in 2020 and 2021.

47. Committing one lane on the Harbour Bridge for cycling is a critical political step. It is a high visibility project that has the capacity to change the public's understanding of how to better use road space, especially where space is at a premium. It is an example of the sort of project that could help create rapid mode-shift throughout the network, which is required to achieve the C40 commitment Auckland has made of getting its emissions on track for meeting our targets in 2024.

### ***Bring forward rapid transit and public transport improvements***

48. We generally support the rapid transit and public transport programmes in the draft RLTP. Some of the programmes are unnecessarily expensive because, instead of using road reallocation to provide the corridors for the buses or light rail, the space for public transport is to be provided by widening the corridors. The unnecessary expense, therefore, is a result of retaining driving capacity. This reflects the philosophy underpinning the draft RLTP – that driving must be preserved. As explained above, the RLTP should aim to reduce VKT. This would make active and public transport projects significantly cheaper.
49. All public transport projects in the RLTP should be brought forward to the first half of the decade. Other projects to provide bus priority at scale, involving road reallocation to prevent road widening costs, and circulation plans that reduce traffic, should begin planning work now for implementation as soon as possible and no later than the second half of the decade.

### ***Safer speeds***

50. Auckland speed limits should be changed to 30 km/hr by default, except where it can be demonstrated that a higher speed is safe,<sup>34</sup> and sufficient funding should be provided for the Police to enforce this. It will help enormously with mode-shift, reduce traffic volumes and congestion, and therefore make driving easier for those who do need to drive.

### ***Low traffic neighbourhoods***

51. The entire city should be divided into low traffic neighbourhoods up to approximately 1 square kilometre, in which the streets are quiet and for access only, with no through-traffic. This is a cheap way to re-create a healthy road hierarchy, lower traffic volumes and enable radical mode-shift and reduction in car ownership. These can be implemented using tactical urbanism, but that approach is not essential. Low traffic neighbourhoods are simply good transport planning.

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<sup>33</sup> <https://www.pnas.org/content/118/15/e2024399118>

<sup>34</sup> <https://www.roadsafetysweden.com/contentassets/b37f0951c837443eb9661668d5be439e/stockholm-declaration-english.pdf>

### ***Delay route protection, property purchases and designations for road projects***

52. Road capacity expansion leads to increases in traffic volumes, which affects safety outcomes and therefore further influences mode-shift, increasing traffic volumes further. This increases emissions. We must stop planning road expansion projects. At a very minimum, delaying the below line items until after 2030 would free up \$130 million for better uses.<sup>35</sup>

SH1 Additional Waitematā Harbour Connections (Business Case, Designations and Property)	Waka Kotahi	60
East West Link (Property)	Waka Kotahi	31
Warkworth to Wellsford (Designation)	Waka Kotahi	21
SH1 Drury South to Bombay (Route Protection)	Waka Kotahi	18

### ***Parking***

53. Council land vested in parking is a significant public asset. To achieve the Council’s goals of mode-shift, equity and a liveable city, parking spaces need to be reduced and the land repurposed. All remaining parking needs to be sufficiently priced (public) or levied (private) to encourage mode-shift and provide an equitable revenue stream. Council should wind up the existing residential parking schemes. These inequitable schemes allow residents of wealthier inner areas to store their private vehicles on expensive public land, freeing up their own land for other uses. These areas should have wider footpaths, safe cycling, and fewer cars — this can be enabled through getting rid of kerbside parking.

### ***Re-thinking Future Connect***

54. Future Connect always presented a risk; any planning tool that was adding an interpretive extra step to the planning process can add a hidden bias, however well-intended. The Future Connect layers can easily lead to poor decision-making. For example:

- The deficiency layer does not seem to distinguish between progressive methods for addressing deficiencies (such as road reallocation, circulation plans, pricing, better public transport frequencies, etc) and regressive methods (such as widening intersections, increasing road capacity, favouring dominant traffic flows over vulnerable road users at traffic signals).
- There is no layer for road reallocation plans (despite Auckland Transport having been instructed to do this in the Council’s Letter of Expectation 2016).
- There is no layer to show the vehicle emissions, despite NZTA having a GIS Vehicle Emissions Measurement Tool.
- The tool still uses the “Level of Service” system. Replacing the system with “VKT reduction” would produce outcomes more in line with necessary emissions reductions.

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<sup>35</sup> Draft RLTP, p. 55.

- The cycling layer is just a subset of the Auckland Cycle Network, and it shows different types of cycling treatments, even though decisions on the type of cycleway would generally be something the Roads and Streets Framework should resolve.
- There are plenty of amenities for which AT is responsible that do not have layers yet need to feed into decision-making (e.g. trees and green infrastructure).

55. In summary, Future Connect could be useful if it is re-imagined as a mode-shift, climate and safety planning tool to enable a swift reallocation of road space and of driving priority to other modes and uses.

56. This is significant for the RLTP as Future Connect informs decision-making for many projects. The budget allocated to Future Connect does not seem to be itemised. This budget can only be considered well-spent if the programme is improved to ensure it accelerates mode-shift, transport transformation, urban place regeneration and emissions reductions. Good governance requires this programme is monitored closely, and that it is managed by someone suitably qualified in using planning tools that are intended to achieve these goals.

### ***Spatial priorities***

57. To help reduce VKT, we need to improve “proximity” for residents to the things they visit. Reducing trip distances in this way requires Council and Auckland Transport to deliver on a genuine compact city strategy.

58. The transport plans for Dairy Flat, Silverdale, Warkworth, Drury, Paerata and the other sprawl areas need to be shifted away from transport plans that “support growth”, towards developing a functioning public transport network and walk-bike routes for the existing population.

59. There are many areas within the existing urban area that need concentrated planning attention. The RLTP needs to shift all funding from new roading and growth infrastructure in new urban areas to supporting regenerative intensification of brownfields areas.

### ***Regional Fuel Tax***

60. The Regional Fuel Tax scheme should be further amended to ring-fence funding solely to public transport and active modes infrastructure. Long-term the fuel tax should become irrelevant due to mode shift and electrification of the vehicle fleet. Regardless, it can provide short-term assistance in prioritising sustainable transport infrastructure.

### ***The way forward***

61. The draft RLTP must be revised to propose a land transport system that provides for swift and substantial emission reductions in line with legal requirements and with the urgent demands of the climate emergency. If this requires the Council to liaise with the Government and revise ATAP, then that is what must happen.

62. We are counting on you.