

Submission on the Draft Auckland Regional Land Transport Plan (RLTP)



30th April 2021

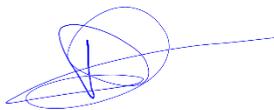
Attn: Auckland Transport and Auckland Council

Thank you for the chance to contribute to the Auckland Regional Land Transport Plan (RLTP). We acknowledge the work and consultation in preparing this draft. Please find our submission below. Our submission draws on an extensive evidence base around climate change and health, and has been prepared by a team of health professional volunteers representing OraTaiao: New Zealand Climate & Health Council.

We agree that Auckland needs a well-coordinated and integrated approach to help people and freight get around quickly and safely – one that significantly reduces harm to the environment and where there are multiple transport choices. We support the Auckland Council declaration of a climate emergency and the Te Tāruke-ā-Tāwhiri: Auckland’s Climate Plan, which boldly aims to halve Auckland’s greenhouse gases by 2030.

While we support the intent of the draft advice, much more ambitious targets for active and public transport increases, and modeshare shifts from private motor vehicles need to be included. There has not been enough consideration of the health and health equity gains that can be made by emission reducing policies and Te Tiriti o Waitangi has not been centralised throughout the draft.

Ngā mihi,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Dr Dermot Coffey, Co-convenor,
OraTaiao: NZ Climate & Health Council
co-convenor@orataiao.org.nz
Mobile: 021 026 75452
www.orataiao.org.nz

About OraTaiao

OraTaiao: The New Zealand Climate and Health Council is an organisation calling for urgent, fair, and Tiriti-based climate action in Aotearoa; we recognise the important co-benefits to health, well-being and fairness from strong and well-designed mitigative policies. We honour Māori aspirations, are committed to the principles of te Tiriti o Waitangi and strive to reduce inequities between Māori and other New Zealanders. We are guided in our practice by the concepts of kaitiakitanga (guardianship), kotahitanga (unity), manaakitanga (caring), and whakatipuranga (future generations).

OraTaiao has grown over a decade to more than 700 health professionals concerned with:

- The negative impacts of climate change on health, well-being, and fairness;
- The gains to health, well-being, and fairness that are possible through strong, health-centred climate action;
- Highlighting the impacts of climate change on those who already experience disadvantage or ill-health (i.e., equity impacts);
- Reducing the health sector's contribution to climate change.

As well as individual members, we are backed by 19 of New Zealand's leading health professional organisations for our Health Professionals Joint Call to Action on Climate Change and Health¹. This support includes the New Zealand Medical Association, the New Zealand Nurses Organisation and the Public Health Association, plus numerous specialist colleges. Together, these organisations represent tens of thousands of our country's health workforce. As an organisational member of the Board of the Global Climate & Health Alliance, we work with a worldwide movement of health professionals and health organisations focused on the urgent health challenges of climate change - and the health opportunities of climate action. OraTaiao signed the Doha Declaration on Climate, Health and Wellbeing of December 2012, which reflects this international perspective.

Submission

Our submission is focused on health and health equity co-benefits of well-designed emissions reduction policies, and in fully embedding te Tiriti o Waitangi and te ao Māori within the RLTP. If we are serious about our commitment to meet our obligations to the Paris Agreement, then we ask that the RLTP is bold and ambitious. The potential to recoup costs of emissions reducing policies with significant health gains, let alone savings from avoided climate changes, must drive responsible and effective emissions budgets.

The RLTP must “contribute to an effective, efficient, and safe Auckland land transport system in the public interest”. This requirement is contained in the Land Transport Management Act 2003, sections 3 and 14(a)(i) and Local Government (Auckland Council) Act 2009, sections 39 and 45. The draft RLTP does not meet this requirement because it proposes for emissions to increase by 6% by 2031. It is therefore not in the public interest. Auckland Council’s own Climate Plan defines what is in the public interest in this regard – 64% reduction in transport emissions by 2030.

Health

“Achieving net zero emissions is the most important global health intervention now and for decades to come,” and the “health benefits will outweigh the costs of mitigation policies, even without considering the longer-term health and economic benefits of avoiding more severe climate change,” according to the former WHO Director-General, Dr Margaret Chan².

At present the draft sees transport emissions in Auckland could increase by 6% by 2030, which is absolutely unacceptable. As the largest city in Aotearoa New Zealand with transport as our largest sector of emissions the RLTP represents a significant opportunity to make a difference that will benefit the health of many. Recent work clearly shows that optimising health benefits depends on a country’s chosen path to decarbonisation³, such as how it manages resource extraction, food production, social organisation, new technologies, and air and other environmental pollution.

Air pollution poses a major threat to the climate and our health. The main cause of air pollution in Auckland is transport. We know that transport-related air pollution affects a number of health outcomes. Breathing in air pollutants can irritate airways and may cause shortness of breath,

coughing, wheezing and asthmatic episodes. Air pollution is the cause and aggravating factor of many respiratory diseases like chronic obstructive pulmonary disease, asthma, and lung cancer. Such pollution also contributes to an increased risk of early death.

Not all emissions reductions policies are equal in how they affect other challenges in Aotearoa such as our high rates of cardiovascular disease, obesity, diabetes, respiratory disease, suicidal depression, and many other non-communicable illnesses. International modelling shows the possibility of recouping the costs of emissions-reducing policies through the health gains made, but only with well-designed policies.

People have differences in health that are not only avoidable but unfair and unjust. Health equity recognises that different people with different levels of advantage require different approaches and resources to get equitable health outcomes. People would have better health, due to a reduction in morbidity and mortality from injury and air pollution and through increased levels of physical activity and active transport modes and a low carbon public transport system.

As Auckland continues to have one of the highest rates of pedestrian, cyclist and motorcyclist road deaths in the world, much more needs to be done to keep people safe. Your question around safety is misleading as safety is a priority, however, you have not included safe, separated cycleways which would go a long way to increasing road safety and encouraging active transport.

There are also known impacts of climate change on mental health, such as an increase the incidence of acute traumatic stress, post-traumatic stress disorder (PTSD), depression, anxiety, substance use disorders, and suicide. Indirect effects on mental health are likely to arise from damage to land, infrastructure and community functioning, leading to climate-related migration, armed conflict and other violence. As with physical health, mental health impacts can disproportionately affect already disadvantaged communities.

There are also mental health effects, particularly among children, arising from the perception that our society is failing in its duty to adequately address this existential threat. Conversely, individual and collective action to mitigate the crisis is regarded as an important means to address climate-related anxiety and depression. OraTaiao believes there will be appreciable mental health benefits, particularly to disadvantaged communities and to children and young people, of ambitious and visible policies regarding transport and emissions reductions in general.

Transport

We agree that “Emissions and other consequences of transport are harming the environment and contributing to the transport system becoming increasingly susceptible to the impacts of climate change”⁴, however this does not take into account the health impact of climate change and pollution.

Transport emissions are one of the fastest growing areas of greenhouse gas emissions in New Zealand, and the form of transport we use has significant implications for health and equity. People have differences in health that are not only avoidable but unfair and unjust. Health equity recognises that different people with different levels of advantage require different approaches and resources to get equitable health outcomes.

While we agree with the recommendation to rapidly decarbonise the vehicle fleet, we have significant concerns the advice represents a continuation of the status quo dominance of private vehicle ownership. What is required is a transformational shift in transport mode to safe and accessible active and electric public transport, and from road to sea and rail freight. This will not only address greenhouse gas emissions but also improve health, wellbeing and equity.

We require a just transition that does not unfairly burden low income and marginalised communities. Although we support some financial incentives to purchase EVs, it must also be realised that there is not enough resource worldwide for everyone to have an EV and maintaining this as an option is disingenuous and supports the status quo of relying on cars.

Mode shift to cycling needs to be supported by incentivising the rapidly accelerating uptake of electric bikes, and through safe cycling infrastructure such as separated cycling lanes and quiet streets. Wherever there is a footpath there should also be cycle infrastructure. Shared paths should not form part of new plans.

Macmillan et al. modelled which cycle lane policy would yield the best benefit-cost ratio and found that “the most effective approach would involve physical segregation on arterial roads (with intersection treatments) and low speed, bicycle-friendly local streets”; and this would be cost effective: “These changes would bring large benefits to public health over the coming decades, in the tens of dollars for every dollar spent on infrastructure”⁵.

E-bikes will be an important part of the active transport strategy and must be incentivised. Uptake is rapidly accelerating and has the potential to disrupt the urban transport status quo. Their uptake is far outpacing the uptake of electric cars and this should be capitalised on. E-bikes lower barriers to cycling, allow longer commutes, and would benefit suburban and rural settings the most given the right infrastructure⁵. E-bikes could help low-income households that are the most affected by the cost of running a car^{5,6} but safety and connectivity are key in making cycling a usable option for commuters⁷.

The RTLP recommends “encouraging” active transport. OraTaiao recommends building infrastructure that will empower New Zealanders to cycle. People do not necessarily need to be encouraged to cycle; they need to be enabled.

Electrified public transport needs major investment as a public health good and should be free for under 25s, with reduced fares for other age groups. There should be enhanced quality and access to public transport.

Private vehicle use should be curtailed through measures such as increased parking charges, zero emissions zones, widespread adoption of “traffic calming” measures and reduced speed limits. Private vehicles should be regulated as a health hazard including the advertising of high emissions vehicles such as fossil fuel powered SUVs. Of note, there should not be advertising at bus stops for high emissions vehicles. This would go towards reducing the social license for their sale and consumption, as well as eliminating the political influence of industry lobby groups on climate policy.

We agree that insufficient physical activity being a key risk factor for conditions such as cardiovascular disease, cancer, and diabetes. Removing barriers to walking and cycling provides a genuine opportunity to support Aucklanders to live longer and healthier lives. We therefore expect the funding to support this to be much more ambitious than the current 6% proposed.

Disabled People

We note that the terms disability or disabled are not mentioned in the draft and this community must be included in any consultation and transport plans. Auckland Transport must ensure transport accessibility for disabled people by working in partnership with disabled people and

representative organisations to set out urgent priorities in all transport planning and policies across Auckland.

Te Tiriti o Waitangi

The right to the highest attainable standard of health is recognised in the UN Declaration on Human Rights⁸, and hauora (health and wellbeing)⁹ is one of the taonga guaranteed to all citizens under te Tiriti o Waitangi (Te Tiriti). Te Tiriti is only mentioned once and that was in relation to another document. The health and health equity co-benefits of well-designed emissions reduction policies need to be explicit and fully embed te Tiriti and te ao Māori within the advice.

Te Tiriti is the basis for society in Aotearoa New Zealand. “It forms part of our constitutional framework for living well together. The three articles of Te Tiriti allow for a balance of Crown-lead kāwanatanga (governance) alongside Māori tino rangatiratanga over taonga Māori (Māori self-autonomy over Māori treasures), in order to achieve ōritetanga (equality amongst peoples). That is the Te Tiriti bargain ought to be more than the sum of its parts, but a mutually beneficial arrangement with exponential benefits for all under its korowai (cloak)”. Further “The way we live and move around on these lands are vital to all dimensions of our health and wellbeing – that is our wairua, hinengaro, tinana and whānau health (spiritual, emotional and mental, physical and whānau health)”¹⁰.

OraTaiao asks that the RLTP goes further to centralise te Tiriti o Waitangi. We note that the Waitangi Tribunal states¹¹ in their Ko Aotearoa Tēnei (Wai 262) report: “...that it is for Māori to say what their interests are, and to articulate how they might best be protected - in this case, in the making, amendment, or execution of international agreements. That is what the guarantee of tino rangatiratanga requires.” It is important that we don't reduce the Tiriti kaupapa and narrative to simply an equity argument. We need the special partnership relationship, as contemplated by te Tiriti, to be front and centre, and acknowledging that Māori are not just one-of-many stakeholders.

We recommend the concepts of kaitiakitanga (guardianship), kotahitanga (unity), manaakitanga (caring), and whakatipuranga (future generations) be clearly applied to the draft. The principles of both intergenerational equity¹² and tikanga require the current generation to do everything possible to address the climate crisis and reduce the harm inflicted on future generations.

Spending

Climate Change and Safety are our two main funding priorities, but the council has missed the key ways to optimise these and this is not able to be commented in your online submission form.

We suggest that funds from the “National Land Transport Fund” are reorientated to reflect a focus on active and public transport. In particular a focus should be on access to public and active transport for children travelling to and from school.

In regards Auckland's growth there needs to be a clearer focus on whether providing transport infrastructure for new housing developments and growth areas and improving transport infrastructure relates to active and public transport or roading projects. Better public transport connections and roading have been grouped together. We support better public transport and roading projects are less important. This should have been separated out in the questionnaire.

Summary

We urge Auckland Transport and the Council to ensure that the RLTP is bolder and more ambitious with its plan. By including health, equity and te Tiriti it will go much further in promoting the wellbeing of people, improving safety, and reducing our emissions. We ask that the plan goes further in re-balancing the investment towards low-emission public transport, walking and cycling – these are the modes that will contribute to a thriving, resilient and healthy future economy and society.

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Part A: Questions relating to the Draft Regional Land Transport Plan (RLTP)

Auckland is growing, and our transport system faces significant challenges now and into the future. To meet the directives set by central and local government policies and strategies, the draft RLTP aims to contribute solutions to the following challenges:

- Climate change and the environment
- Travel choices
- Safety
- Better transport connections and roading
- Auckland's growth
- Managing transport assets

Do you think we have correctly identified the most important transport challenges facing Auckland?

YES

Please tell us why.

Auckland faces a climate emergency and road safety crisis. There needs to be more focus on public and active transport and less on roading projects. Walking and Cycling needs more than 6% of the budget.

With the Policy Objective to “Make the transport system safe by eliminating harm to people” there is no response about increasing the safe, separated cycleways. A rapid improvement of the current system with clear road markings and separations and an increase in the network would rapidly increase the amount of people choosing to cycle. Cycleways need to be safe for all users, adults and children alike¹³.

This would also support the initiative to “Significantly reduce climate change emissions” and it is a clear omission that cycling has not been included in this section.

The Travelwise Programme and the Walking School Bus programme, while supporting our active transport, unfairly puts the onus on children and parents to keep safe when the responsibility should be with vehicle drivers and policy changes which make streets safer. There is no safety vest bright enough or bell loud enough to protect children from motor vehicles.

“The significant investment in public transport and active modes outlined in the RLTP is forecast by our transport model to increase the combined AM peak mode share from 23 percent in 2016 to 29 percent in 2031”³. An improvement of 6% over the next 10 years is not nearly ambitious enough to help reduce our emissions.

This goal “200 km of new and upgraded cycleways and shared paths across the region by 2031” (Page 46) should be much more ambitious. Retrofitting a range of existing painted cycle lanes with appropriate safety barriers is also a “quick win” that has seen cycling rates increase rapidly overseas. This was also evident in many communities across Aotearoa New Zealand during the Level 4 Covid lockdowns.

To help us understand whether we have correctly allocated funding, please indicate how important the following focus areas are to you.

Climate change & the environment

Projects include:

- Electrifying the rail line to Pukekohe
- Increasing the number of electric/hydrogen buses
- Starting decarbonisation of the ferry fleet
- Funding to support the uptake of electric cars

Very important

Safety

Projects include: Road safety projects which align with our Vision Zero strategy to help prevent anyone being killed or seriously hurt on our roads. This involves:

- Safety engineering improvements, like red light cameras and safety barriers
- Ensuring speed limits are safe and appropriate
- Improving safety near schools
- Road safety education

Very important

Travel choices

Projects include:

- Rapid transit - fast, frequent, high-capacity bus and train services separated from general traffic.
- Additional and more frequent rail services
- New train stations
- New and improved bus stations
- Accessibility improvements at bus, train, and ferry facilities
- New and extended park and ride facilities

Moderately important

Better public transport connections and roading

Projects include:

- Improving the capacity of our roads for people and freight to improve productivity.
- New bus/transit lanes
- New roads to support housing development
- Unsealed road and signage improvements

Less important

Walking and cycling

Projects include:

- New cycleways and shared paths and improved road environments to make cycling safer.
- New or improved footpaths

Very important

Auckland's growth

Projects include:

- Providing transport infrastructure for new housing developments and growth areas
- Improving transport infrastructure in redevelopment locations

Less important

Managing transport assets

Projects include:

- Maintaining and fixing footpaths, local roads, and state highways
- Maintaining the rail network
- Works to address climate change risk e.g., flooding, earthquake and slip prevention requirements

Moderately important

Other

Projects include:

- Funding for community projects which is shared amongst the 21 local boards. This enables smaller scale transport projects decided upon by each local board.
- Funding to undertake long-term planning for the future.
- Customer experience and technology improvements – this includes things like AT HOP card and real-time travel information for customers.

Moderately important

Having considered all of the projects included in the RLTP, please let us know if there are any other projects that you feel should be included.

We encourage the council to support:

- Connecting up the cycling infrastructure to create a network of “Cycle Superhighways” across the city.
- Improved connections to major new cycleway projects such as connections to the North Shore’s Northern Pathway along SH1 and over the Harbour Bridge, Glen Innes to Tamaki Drive and the Southern Corridor Cycleway to connect people and places with these routes.
- Funding to fill in the major safe cycling gap running south from Karangahape Road towards Ellerslie. There are major destinations here (e.g. around Greenlane), but a plan and investment is long overdue to connect through Newmarket and onto the southern areas of the city from Penrose to the new cycleway underway between Takanini to Papakura.
- More funding for nimble and low-key infrastructure projects like Innovating Streets, Low Traffic and Slow Speed Neighbourhoods and ‘popup protection’ that provide both value for money and speedy implementation.

Which project(s) would you remove in order to include the new project(s) you listed above?

Any project that does not aim to deliver on the core objectives of Vision Zero, mode shift and reduction of climate change emissions should be reassessed or dropped including:

- Mill Road
- Penlink

This should include property acquisition due to designations including:

- East West Link
- Warkworth to Wellsford
- SH1 Drury South to Bombay

Savings in these areas need to be reassigned to projects meeting the objectives outlined in the RLTP.

Do you have any other feedback on the draft RLTP?

The draft RLTP funds approximately 16kms of new cycleway across the first 3 years, which means less than 5.5 km per year. This is an extremely low target and does not support us reaching our emission reduction targets, providing safe cycleways or considering the health gains.

Beyond the Regional Land Transport Plan

Delivering a transport system that works effectively and efficiently relies on transport policy and regulations. In order to further improve the safety of our roads, reduce congestion and tackle climate change, some policy changes will be required. Some changes can be implemented by Auckland Transport, but a high number would need to be led by the central government. Your views on the policy changes below will help us to understand the views of Aucklanders and inform us on where we focus our efforts.

How important do you think the following policy changes are to deliver an effective and efficient transport system?

Road safety policy changes

Increased fines for unsafe driving

Moderately important

Demerit scheme to address persistent unsafe driving

Moderately important

Congestion charging

Introduce demand-based road pricing to tackle congestion in phases, supported by improved public transport services and measures to assist financially vulnerable members of our communities

Very important

Environment and climate change policies

Higher standards for fuel emissions to reduce the number of cars on our roads which emit higher emissions

Very important

Incentives to promote electric vehicle ownership

Less important

Removal of the Fringe Benefit Tax for employers who subsidise public transport for their employees

Very important

Part B: Questions relating to the Regional Fuel Tax (RFT)

A key source of funding for transport projects in Auckland is the Regional Fuel Tax (RFT) which was introduced by Auckland Council in 2018 after public consultation. Auckland Council is proposing to change details of projects funded in their current Regional Fuel Tax scheme, in response to funding decisions made by the government and to align with the Draft Regional Land Transport Plan. The proposed changes only relate to projects the RFT will fund (e.g., project descriptions, timings, and allocation of funding for each project). The amount of fuel tax you pay will not change. To learn more about the proposed changes, [please read the full proposal for Regional Fuel Tax for Auckland.](#)

Do you support the proposal to vary the Regional Fuel Tax Scheme?

Yes

Do you have any other feedback on the proposal?

None