

Attachment 3 - How the RLTP 2024-2034 meets the requirements of Section 14 of the LTMA and aligns to Council emissions reduction direction

1. The Land Transport Management Act (**LTMA**) requires that, before the Regional Transport Committee (**RTC**) submits a Regional Land Transport Plan (RLTP) for approval it must meet the conditions set out in section 14 of the Act.
2. This Annex sets out our evaluation against those considerations. Evaluation against Section 14(a)(i) and (ii) is set out in detail below, with the remainder of the evaluation in a table.
3. This evaluation also includes other matters around emissions reduction, that will be relevant for the final Auckland Transport (**AT**) Board decision on approval of the RLTP.

SECTION 14(a)(i) - THE RTC MUST BE SATISFIED THAT THE REGIONAL LAND TRANSPORT PLAN CONTRIBUTES TO THE PURPOSE OF THE ACT

Requirement

4. Section 14(a)(i) of the LTMA requires the RTC to be satisfied that the RLTP contributes to the purpose of the Act, which is to contribute to an effective, efficient, and safe land transport system in the public interest.

Evidence

Effectiveness

5. The RLTP 2024-2033 (the **RLTP**) sets out five Regional Objectives, namely: Faster and More Reliable Public Transport, Network Resilience and sound asset management, Support for the Region's Economic Productivity, Improved Safety and Reducing Deaths and Serious Injuries, and Continued Decarbonisation of the Transport System towards the 2050 Target. All 'discretionary' projects have been assessed for their contribution to achieving these objectives. This is essentially an 'effectiveness' assessment – which tests the scale of the expected contribution a project will make to desired outcomes.
6. In terms of the discretionary projects, what has emerged from the assessment is a programme which prioritises support for public transport infrastructure projects. These projects will improve the competitiveness of public transport (through improvements to speed and reliability), thereby encouraging mode shift and reducing congestion (compared to a do minimum) – enhancing the timeliness of travel for both public transport users and motorists. This in turn supports both enhanced economic productivity (through reduced travel costs) and emissions reduction (through reduced private vehicle travel) outcomes. Investment in walking and cycling achieves similar outcomes. Meanwhile, the programme includes proposals for substantial investments in State Highway improvements which, although a lower priority, are still anticipated to have a significant impact in improving travel conditions and contribute to resilience and economic productivity outcomes.
7. In terms of the non-discretionary elements of the programme, these largely reflect emphasis on:
 - Public transport services, which have already been considered for effectiveness under the Regional Public Transport Plan framework
 - Proposed Maintenance, Operations and Renewals investment. The major feature of this investment is a proposal for increased investment in local road renewals, which supports both effectiveness and efficiency by better ensuring the network is fit for purpose at a lower overall whole of life costs.

- Committed projects, which are effectively mandatory.

Efficiency

8. The RLTP has also assessed projects against four main 'Investment Policy' criteria. These are:
- Finish what we started before embarking on new large-scale investment
 - A back-to-basics approach of smaller scale, tactical, faster and lower cost solutions
 - Expenditure efficiency to deliver value for money solutions as indicated by a project's cost to benefit ratio
 - Timing and urgency.
9. In combination, these policy criteria seek to ensure we are maximising the benefits of existing investment and support overall value for money by delivering effective, smaller, more timely projects at lower cost. This is supported by the results of the prioritisation, which shows that projects with a higher benefit to cost ratio typically have a higher overall ranking.

Safe

10. Improved safety and reduced deaths and serious injuries is one of the key Regional Objectives driving this RLTP. All discretionary projects have been assessed for their contribution to this outcome, and the plan includes investment to improve safety outcomes through infrastructure improvements at high risk locations, speed management and working with communities to deliver road safety promotion and mode shift activities
11. The plan also supports reductions in harmful particulate emissions by supporting mode shift through investment in public transport services and public transport, walking and cycling infrastructure. Long-term decarbonisation of the public transport network (for example, through investment in low emissions ferries) is also supported.

In the public interest

12. For the reasons set out above, the RLTP contribute to an effective, efficient, and safe land transport system. It follows that it also contributes to a land transport system in the public interest.
13. To the extent that the public interest encompasses wider social, cultural, economic and environmental wellbeing, the proposed RLTP programme supports this wellbeing by:
- a. ensuring improved travel times across all modes. In turn, this improves connectivity and provides enhanced access to key social, cultural and economic opportunities; and
 - b. prioritising investment in public transport infrastructure and services, which is anticipated to support mode shift and reduce private vehicle travel and associated greenhouse gas emissions. As noted, the RLTP also proposes investment in the long-term decarbonisation of the public transport network.
14. Public and stakeholder feedback demonstrates broad support for the challenges and objectives identified by this RLTP, along with the priority for discretionary investment in public transport infrastructure. This suggests that the RLTP broadly aligns with the way that the public see their interests reflected in future investment in the transport system.

Section 14 (a)(ii) THE RTC MUST BE SATISFIED THAT THE REGIONAL LAND TRANSPORT PLAN IS CONSISTENT WITH THE GPS ON LAND TRANSPORT

Requirement

15. The RTC must be satisfied that the RLTP is consistent with the Government policy statement on land transport 2024 (**2024 GPS**).

Evidence

16. The following section sets out how the RLTP is consistent with the 2024 GPS, and supports the four strategic priorities set out in that document..

GPS Overarching Priority – Economic Growth and Productivity

17. The Economic Growth and Productivity strategic priority is identified as the overarching strategic priority in the GPS. Increased maintenance and resilience, safety and value for money are all equally weighted and important priorities that collectively support the delivery of a transport system that drives economic growth and productivity.
18. The GPS notes that the transport sector supports economic growth and productivity by providing quality transport connections which enable goods and people to reach their destinations efficiently. The concept applied in this assessment builds on this to recognise the role of transport improvements in improving access to jobs and the labour force as part of supporting urban productivity.

Overall approach

19. The RLTP emphasises investment in effective and efficient public transport infrastructure projects as the key route to supporting economic growth and productivity within the Auckland region.
20. Public transport has the potential to move large numbers of people more efficiently than private vehicles. With limited available transport corridor space and the high cost of land purchases, public transport is often the only realistic way to increase the capacity of our transport network to accommodate future growth. In particular, prioritising public transport infrastructure supports economic growth and productivity by ensuring continued timely access to our key commercial employment centres. Investment in public transport, along with walking and cycling, also encourages mode shift away from private vehicle trips, which has the benefit of reducing congestion and therefore provides more space for freight and other business travel that needs to use private vehicles. This approach is recognised in the GPS, which notes that effective public transport provides commuters with more choice and helps to reduce travel times, congestion and emissions.
21. Alongside public transport, the RLTP also proposes investment in other modes to support economic development outcomes. For example, the RLTP proposes major investment in the State Highway network, particularly the Waitemata Harbour Connections project which will improve resiliency and reduce congestion on this critical national link (SH1). Other State Highway projects, such as the East West Link and Mill Road, support freight or provide network capacity outside of the urban area where public transport and cycling are less practical transport alternatives. Meanwhile, investment in projects on the local road network will help to optimise the network and support more sustainable travel from key growth areas. It will also enable future investment in Time of Use charging as a way of enhancing demand management approaches.

Inclusion of Key Projects

22. The GPS notes a number of key projects within Auckland as supporting its approach to achieving economic growth and productivity outcomes. These projects – Warkworth to Wellsford, Mill Road, the East West Link, Additional Waitemata Harbour Connections, completion of the CRL and supporting infrastructure, the Eastern Busway, NorthWest Rapid Transit Corridor and components of the Airport to Botany Busway - are all included in this RLTP's proposed investment programme.

Prioritisation approach

23. The prioritisation approach used to rank this RLTP's proposed investment programme supports the economic growth and productivity priority. Together the 'Faster, More Reliable Public Transport' and 'Support for the region's economic productivity' objectives in the RLTP, which both support the economic growth and productive strategic priority in the 2024 GPS, account for almost 50% of the weighting given to Regional Objectives in the assessment. This meant that projects performing well against these criteria typically received a higher overall ranking in the programme.

GPS Priority – Increased Maintenance and Resilience

24. The RLTP has treated Maintenance, Operations and Renewals as a non-discretionary, activity. In total, the RLTP proposes nearly \$13 billion of investment in maintenance, operations and renewals.

25. Importantly, the RLTP also proposes significantly increased investment in local network renewals to respond to recent cost increases, and enables progress to be made in addressing the backlog of local network road surface renewals that has built up over recent years. This aligns well with the new 'Pothole Prevention' activity class.

26. "Network Resilience and sound asset management" has been included as a regional objective, and therefore drives prioritisation of the discretionary programme. The RLTP proposes significant investment in network resilience activities, with almost \$500 million worth of investment in Auckland Transport's resilience portfolio, and over \$500 million for KiwiRail projects that will support improved resilience for the rail network. A number of State Highway projects - such as Waitemata Harbour Connections and Warkworth to Wellsford - will also significantly improve the resilience of key inter-regional corridors.

GPS Priority – Safety

27. "Improving safety and reducing deaths and serious injuries" is one of the regional objectives driving RLTP prioritisation. Discretionary projects were ranked for their contribution to safety outcomes, and the RLTP includes \$710 million in proposed direct investment in safety.

28. Much of the direct safety investment is focused on the Road Safety Programme and Safe Speeds programme, which reflects the way AT view of how safety objectives in the Auckland context are best achieved. Investment will, however, be tailored to ensure safety interventions are fit for purpose for each location. AT expects to reduce its reliance on things like raised pedestrian crossings (in light of the regional objective and GPS strategic priority relating to value for money, discussed below), and will work to deliver the right intervention at the right location.

GPS Priority – Value for money

29. The RLTP's approach to value for money aligns well to the GPS. As described above, we have prioritised projects for their contribution to overall Regional Objectives, incorporating GPS priorities. We have also prioritised projects against the following 'investment policies':

- Finish what we started before embarking on new large-scale investment
- A back-to-basics approach of smaller scale, tactical, faster and lower cost solutions
- Expenditure efficiency – which seeks to deliver value for money solutions as indicated by a project's benefit to cost ratio
- Timing and urgency – the urgency of the problem to be solved

30. In combination, our assessment against the Regional Objectives, which test effectiveness, and Investment Policies, which test value for money, means the RLTP aligns well to the Ministry of Transport's effectiveness and efficiency framework referenced in the 2024 GPS.

31. Although not directly influenced by the RLTP, Auckland agencies are also undertaking a number of initiatives that support the GPS value for money objective. These include:

- An expected increase in the farebox recovery ratio for public transport services from around 30 percent to around 40 percent by the end of the decade
- Work to reduce expenditure on temporary traffic management while preserving safety
- Changes to AT’s approach to road safety investment to insure investment is focused on the highest benefit and cost effective changes
- Pursuing time of use charging and dynamic lanes to make the most out of existing assets.

Overall Conclusion

32. Overall, the RLTP is consistent with the 2024 GPS, although it reflects elements that are specific to Auckland in the way it proposes to deliver on the 2024 GPS strategic priorities. In particular, this sees a strong focus on public transport investment as the most effective way to achieve economic growth and productivity and other strategic priorities in the crowded urban environment.

Other requirements in s.14 of the LTMA

Before a Regional Transport Committee submits a regional land transport plan to a regional council or Auckland Transport (as the case may be) for approval, the regional transport committee must:

<p><i>(b) have considered—</i></p> <p><i>(i) alternative regional land transport objectives that would contribute to the purpose of this Act;</i></p> <p><i>(ii) the feasibility and affordability of those alternative objectives</i></p>	<p>The RTC considered Regional Land Transport Objectives at its meeting in March 2024. The relative weighting of these objectives was also considered, and then refined in the final RLTP in response to public feedback.</p> <p>A number of objectives were considered earlier in the process, with a view to aligning to the direction from the LTP and expected direction of the GPS. These objectives included Inter-regional freight, and Progress with Projects of National Significance.</p> <p>Officers considered that these alternative objectives were less feasible than those that aligned more closely to final GPS guidance.</p>
<p><i>(c) have taken into account any—</i></p> <p><i>(i) national energy efficiency and conservation strategy; and</i></p>	<p>The NZEECS 2017-22 identifies three priorities, of which ‘Efficient and low emissions transport’ is most relevant to the RLTP. In addition to matters discussed above, the RLTP supports the NEECS by:</p> <ul style="list-style-type: none"> • The inclusion of programmes to decarbonise the bus and ferry fleet • Projects to expand the reach and capacity of the Rapid Transit Network, supporting greater intensification around transport hubs • Programmes to support Intelligent Transport Systems • Projects that support freight and passenger movement by rail. <p>Note that the NZEECS expired in June 2022 under section 12 of the Energy Efficiency and Conservation Act 2 but has not yet been replaced.</p>
<p><i>(c) have taken into account any—</i></p> <p><i>(ii) relevant national policy statements and any relevant regional policy statements or plans that are for the time being in force under the</i></p>	<p>The National Policy Statement on Freshwater Management (NPS-FM) 2020. The NPS-FM sets the direction on how freshwater should be managed in New Zealand. The RLTP projects will incorporate improved stormwater management. The Government has announced its intention to begin work on a replacement for the NPS-FM in 2024 and the deadline for councils to notify freshwater plan changes has been extended by three years to 31 December 2027.</p>

<p><u>Resource Management Act 1991</u>; and</p>	<p>The National Policy Statement on Urban Development (NPS-UD) 2020</p> <p>The NPS-UD seeks to ensure that New Zealand has well-functioning urban environments. The RLTP supports this objective by ensuring that the urban environment is serviced by existing or planned public transport, and that land-use planning can be integrated with infrastructure planning and funding decisions.</p> <p>The NPS-UD also requires councils to prepare a Future Development Strategy (FDS) and councils are strongly encouraged to use the FDS to inform the RLTP. The FDS sets broad strategic context for the RLTP, including high priority housing development areas.</p> <p>Auckland Unitary Plan (AUP). The development of the RLTP has taken account of the provisions and general direction of the AUP in that the RLTP objectives, investment programme and outcomes align with the following transport objectives in the Regional Policy Statement within the AUP.</p> <p><i>(1) Effective, efficient and safe transport that:</i></p> <ul style="list-style-type: none"> <i>(a) supports the movement of people, goods and services;</i> <i>(b) integrates with and supports a quality compact urban form;</i> <i>(c) enables growth;</i> <i>(d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and</i> <i>(e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.</i> <p>In particular, the RLTP’s strong emphasis on fast and reliable public transport supports efficient movement, enables compact growth and helps to mitigate adverse effects on the environment.</p> <p>The expected form of land use under the AUP has also been part of the context considered when assessing project prioritisation.</p>
<p><i>(c) have taken into account any—</i></p> <p><i>(iii) likely funding from any source</i></p>	<p>The RTC has considered likely funding sources through the development of the Draft RLTP investment programme and these are set out in Section 8.</p>

Other considerations - Alignment to Auckland Council’s emissions reduction objectives

33. As part of its approval of the final RLTP, the AT Board in particular will need to consider how the document aligns with the Board’s additional responsibilities under local government legislation. A key additional consideration are the environmental responsibilities arising from AT’s obligation to “give effect” to relevant aspects of the Long-Term Plan (LTP) and for the decisions of AT’s Board to be in accordance with AT’s Statement of Intent (SOI).

The Auckland Long-Term Plan: Strategic Direction

34. The LTP sets out strategic direction on climate change. It notes:

“To face the challenges that climate change poses to the region, the council adopted Te Tāruke ā-Tāwhiri: Auckland’s Climate Plan in July 2020. The principles of Te Tiriti o Waitangi are foundational to council’s approach to climate action and the plan was developed in partnership with mana whenua to ensure it incorporated a Te Ao Māori perspective.

Te Tāruke-ā-Tāwhiri sets the pathway for the Auckland region to achieve a 50% reduction in GHG emissions by 2030 compared to those in 2016 (referred to as the baseline), and net-zero emissions by 2050 and adapting to the impacts of climate change.

Te Tāruke-ā-Tāwhiri is a plan for all of Auckland to deliver and the council plays an important role in facilitating the required action to achieve its objectives. We recognise that we need to make fundamental changes to our organisation, the way we work and how we interact with our communities.

This long-term plan includes proposals that focus on our physical and financial resilience. It also acknowledges that we will need to continue to consider how council contributes and leads the way towards a low carbon and resilient region.”

35. The Infrastructure Strategy section of the LTP also addresses emissions reductions targets. It notes Auckland Council’s climate goals include

“reducing regional greenhouse gas emissions by 50% by 2030 and achieving net zero emissions by 2050. The following pathways have been identified as ways to meet this goal:

- Reducing Auckland’s transport emissions by 64% by 2030 through significant transport mode shift, as well as through the change to a more compact urban form (that also reduces the need for other ancillary infrastructures such as water or stormwater)
- Reducing vehicle kilometres travelled (VKT) in Auckland by 50% by 2030 through improved urban form and providing better travel options.”

36. While these pathways, including the Transport Emissions Reductions Pathway (TERP), have been identified, they are not fully funded by the LTP. Previous work advised to the Council, such as the Vehicle Kilometers Travelled Reduction Plan which looked at options for achieve large scale reductions in private vehicle travel, has identified that a significant increase in funding would be required to achieve the scale of reduction in VKT needed to achieve the Council’s greenhouse gas emissions pathway. Instead, the overall intent is that the transport investment funded in the LTP contributes towards the outcomes. For example, the transport section of the LTP summary notes:

“Transport investment will remain as one of the council’s most important tools to reduce carbon emissions, such as the ongoing addition of electric vehicles to our bus and ferry fleets. Getting more people to use public transport also helps reduce emissions.”

The Long-Term Plan: Specific expectations and measures

37. Section 2 of the LTP sets out Council’s proposed investment in transport activities, along with expected results and the specific measures that will be used to track performance. Consequently, this section provides the best description of Council’s expectations from transport investment.

38. Section 2.1 covers Roads and Footpaths. It notes a capex budget of \$8.3 billion and \$3 billion for operating, with a focus on:

- Fixing the roads by fully funding council's share of road renewals (\$5.5 billion) if co-funding is available and the Unsealed Road Improvements programme (\$125 million)
- Progressing removal of level crossings needed for the CRL as well as removal of the next priority level crossings in Takānini (\$613 million)
- Working with Kāinga Ora. The council has allocated \$200 million for transport capital expenditure to support investment in priority housing areas and the Auckland Housing Programme. The council is working on next steps with Kāinga Ora to explore the potential use of the Housing Acceleration Fund (HAF), which is pending government approval.
- Cutting congestion by making the most of what we have and making progress on 'time-of-use charging.

These are key parts of the investment programme proposed by AT for the RLTP.

39. Section 2.1 outlines a range of targets for this investment area. These are around improved safety along with improved maintenance standards. Outcomes in these are supported by the RLTP. There are no targets relating to greenhouse gas emissions reduction.

40. Section 2.2 covers public transport and demand management, noting \$6.3 billion of capital investment and \$14.1 billion of operating budget. This section notes the focus is on:

- Maintaining and enhancing public transport services, including maintenance activity for rail tracks through additional operating funding
- Enabling \$50 weekly public transport pass, a maximum weekly charge for adults
- Improving bus driver safety by installing safety screens to protect drivers over the next two years (\$6.5 million), enabled by the co-funding from NZTA and Council (\$3.25 million each)
- Expanding the 'Fareshare' scheme to businesses with at least five employees to allow employers to cover a part of the cost of their employees' public transport, a benefit that is exempt from fringe benefit tax (FBT)
- Investigating further innovative fare products that reward people who make regular public transport trips
- Finishing existing Rapid Transit projects (including the CRL and Stage 3 of the Eastern Busway) and progressing work on additional affordable projects to complete the network.

41. Under "things we are keeping an eye on" Section 2.2 notes:

"Works on the public transport network can create emissions and run-off sediments and disrupt commuter travel. We seek to minimise environmental impacts by building a sustainable transport network that reduces carbon emissions and by ensuring adequate sediment controls are in place.

Auckland Transport provides safe, reliable and frequent public transport to reduce the need for light vehicle trips that account for around 70 % of transport emissions. We mitigate disruptions through public information campaigns, schedule changes, traffic management systems and alternative public transport services. These measures also keep work areas safe".

Although this section references the contribution public transport can make to supporting emissions reduction, it does not set specific targets.

42. Section 2.2 also includes a range of performance measures, which largely relate to public transport and other transport network performance. These is a target around reducing AT's operational emissions, including from public transport – but this does not capture wider transport network emissions.
43. Overall, the key operative sections of the LTP relating to transport set a range of expectations from Council's investment in transport, which this RLTP supports, but it does not include an expectation to achieve the scale of greenhouse gas emissions reductions envisaged by Te Tāruke-ā-Tāwhiri or the Transport Emissions Reduction Plan.

The Statement of Intent

44. The SOI also addresses emissions reduction. The current draft (as at 10 July) of the 2024 to 2027 SOI notes:

“Auckland Council set a target to reduce emissions by 64% by 2030 in Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan and outlined a potential pathway of activities in the Transport Emissions Reduction Pathway (TERP). This target is more ambitious than Central Government's Emissions Reduction Plan, and although we acknowledge these targets and are working towards them, there is insufficient funding to deliver on these outcomes. Council is not on track to meet its 2030 targets and this focus has been deprioritised.

To the extent that is possible within approved funding, we will continue to work collaboratively with Council and key partners to progress the transformation areas outlined in TERP, including exploring demand management tools”.

45. This RLTP seeks to make a strong contribution to reducing greenhouse gas emissions, while meeting other policy objectives particularly those outlined in the 2024 GPS. Discretionary projects were prioritised against 'Continued decarbonisation of the transport system towards a 2050 target' as one of the five Regional Objectives.
46. As a whole, the RLTP places significant emphasis on investment in public transport infrastructure and services, in particular to support a range of objectives that includes decarbonisation of the public transport fleet along with mode shift to support a reduction in emissions. Around 43% of the total proposed RLTP investment is allocated directly to public transport infrastructure and services.
47. Within Auckland Transport's programme, around 60% of proposed investment is directly allocated to public transport and walking and cycling projects. The figure would increase if public transport and active mode elements in other project categories are fully assessed. In the context of the range of objectives expected from the LTP and SOI, this demonstrates a strong commitment within AT's overall fundable investment programme to support mode shift activities that reduce emissions and contribute to the Te Tāruke-ā-Tāwhiri and TERP pathways.