

Attachment 5: How the draft RLTP 2021-2031 meets the requirements of section 14 of the LTMA

1. The Land Transport Management Act (LTMA) requires that, before the RTC submits an RLTP to the regional council, it must meet the conditions set out in section 14 of the Act. Section 14 is set out in the appendix.
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.

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

Requirement

3. 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.
4. The Government Policy Statement on Land Transport 2021/22-2030/31 (the GPS) provides a clear indication at page 47 of how the purpose of the LTMA should be interpreted:

Without limiting the legal interpretation of these terms, for the purpose of GPS 2021, a land transport system is:

- *effective when it moves people and freight where they need to go in a timely manner*
- *efficient when it delivers the right infrastructure and services to the right level at the best cost*
- *safe when it reduces harm from land transport*
- *in the public interest where it supports economic, social, cultural and environmental wellbeing*

Evidence

5. The draft RLTP 2021-2031 sets out six outcomes relating to mode choice, environment and sustainability, access and connectivity, safety, supporting growth and asset management. The objectives are aligned with the 2021 GPS and Auckland Plan. The first five objectives are agreed objectives in ATAP, with the addition of the 'Sound Asset Management' objective by the RTC.
6. The RLTP's contribution to "an effective, efficient and safe land transport system in the public interest" is outlined below. Many of the contributions arising from the RLTP investment programme are overlapping and cumulative – for example effective transport interventions will support and enhance contributions to public interest and efficiency. The key reasons why the RLTP contributes to the purpose of the LTMA are as follows:
 - (i) **Effective:** The RLTP investment programme contributes to an effective land transport system by:

- a. Investing heavily in infrastructure and services to improve the speed, frequency, attractiveness and safety of the public transport and cycling networks. Examples are the City Rail Link and supporting projects, the Eastern Busway and Connected Communities, along with increased frequency and coverage of rail and bus services. This, in turn, will encourage mode shift away from private vehicle travel, improving conditions for those that continue to need to move on the road network, such as many freight operators.
 - b. Increased investment to ensure the transport system is appropriately maintained and renewed.
 - c. Investment across different modes to improve access to employment, social and cultural opportunities.
 - d. Investment in 'Community Connect' to make public transport more affordable to those on Community Services Card.
 - e. Major investment to support growth in the spatial priority areas and help ensure sustainable transport (public transport and active) mode use and reduced congestion. As an example, this includes over \$400 million in investment in the Auckland Housing Programme development areas.
 - f. Examples of the forecast results delivered by this investment between 2016 and 2031 include:
 - i. a 60 per cent increase in the number of jobs accessible to the average Aucklanders by a 45-minute public transport journey and a 14 per cent forecast increase in the number of jobs accessible by a 30-minute car journey at peak times (see 'Measuring outcomes: access and connectivity'). Access to social and cultural opportunities is expected to improve by a similar amount.
 - ii. A 55 percent reduction in time spent in congestion on the public transport network.
 - iii. A slight improvement in average travel speed across the road network in both the morning peak and interpeak.
 - g. Advocating for The Congestion Question as the primary tool to improve accessibility and travel speeds. Responsibility for implementing road pricing rests jointly with the government, Council and AT.
- (ii) **Efficient:** The RLTP investment programme contributes to the efficiency outcome as it has been rigorously developed and tested through the multi-party ATAP process to ensure the right mix of projects at the right scale of investment was selected to best address Auckland's transport objectives (and therefore legislative requirements). This includes use of the Portfolio Investment Analysis tool which is an appropriate approach to evaluating land transport investment and has also been applied by the MOT to prioritise government investment programmes. Specific analysis around land use and climate change priorities has also been undertaken. This prioritisation included identifying projects that were 'Committed or Essential' and recognising that there was very little discretionary funding available to invest in new areas.
- A major increase in investment in renewals on the local road and local public transport will also contribute to efficiency by ensuring the network is renewed at the appropriate time to avoid higher costs in the long-term.
- (iii) **Safe:** The RLTP contributes to reduced harm from the transport system through the adoption of Vision Zero principles along with:

- a. Investment in AT's Safety programme (including the Safe Speeds programme), Marae and Papakainga Turnouts programme, School Speed Management and other safety programmes, as well as Waka Kotahi's Safer Networks and other programmes.
- b. A major investment in mode shift, to encourage a greater take-up of this safer mode of travel.
- c. The delivery of over 200 kms of new or improved safe cycling infrastructure.
- d. The promotion of several policy levers to make the transport system safer.

These investments are expected to see a 67% reduction in deaths and serious injuries between 2018 and 2031.

(iv) **In the public interest:** In addition to the above, the RLTP contributes to the public interest as follows:

- a. Supporting economic, social and cultural wellbeing by investing in new transport capacity, particularly in the public transport network, to ensure that the transport system can accommodate Auckland's future growth and still function effectively. This includes delivering a forecast 60% increase in access to employment by public transport and a 14% improvement in access to employment by private vehicle between 2016 and 2031.
- b. Significant investment to support growth and new housing in the spatial priority areas in a manner that supports sustainable transport outcomes and reduced congestion.
- c. Supporting a safer transport system, by adopting the principles of Vision Zero and targeting a significant reduction in deaths and serious injuries on Auckland's roads.
- d. Developing the public transport and the cycling networks, to encourage greater take-up of these more sustainable modes. The RLTP expects:
 - i. 64% of new trips in the AM peak will be taken up by public transport and active modes; and
 - ii. 200 kms of new or improved cycling infrastructure will be delivered.
- e. Providing an investment programme that, along with initiatives already signalled by Government, will contribute to emission reductions goals by achieving a reduction in emissions between 2016 and 2031 - despite a 22 percent increase in Auckland's population over the same period. When coupled with other policy levers promoted in the RLTP, much larger reductions in GHG emissions could be achieved.

Section 14 (a)(ii) CONSISTENCY OF THE RLTP WITH THE GPS ON LAND TRANSPORT

Requirement

7. The RTC must be satisfied that the RLTP is consistent with the 2021 GPS.

Evidence

8. The following section sets out how the RLTP supports the four strategic priorities of, and is consistent with, the 2021 GPS. Note, this analysis was completed ahead of the Government's 13 June 2021 Clean Car Standard announcement.

GPS Priority - Safety: Developing a transport system where no-one is killed or seriously injured

9. The RLTP objective of "Making Auckland's transport system safe by eliminating harm to people" maps to this GPS Priority.

10. This GPS Priority is also supported by the RLTP objective of "Providing and Accelerating better travel choices for Aucklanders", which has a co-benefit of improving safety by moving away from private vehicle use and improving active mode safety.

11. Consistency with the GPS approach to delivering safety outcomes is achieved by a range of initiatives within this RLTP, including:

- significant investment in safety infrastructure across the local road and State highway networks included in the RLTP
- application of a Vision Zero approach across AT's programme
- investment in a variety of safety programmes, such as road safety education
- incorporation of safety elements across the range of improvement projects included in this RLTP
- supporting a shift to other modes and reducing demand for vehicle travel and associated harmful emissions
- delivery of over 200 kilometres of new or upgraded safe cycling facilities
- advocacy for a range of policy initiatives to further enhance safety outcomes
- major investment in renewals to ensure transport assets meet a reasonably standard and are safe

12. The Primary Outcome for safety is as follows:

The primary focus on this priority is to develop a transport system that advances New Zealand's vision that no-one is killed or seriously injured while travelling. New Zealand roads will be made substantially safer.

13. The RLTP investment programme is consistent with this outcome by reducing deaths and serious injuries on the local road network by 67% by 2031. This is also consistent with the GPS delivery expectations of 'reduced number of deaths and serious injuries' and 'a safer land transport network'.

GPS Priority - Better Travel Options: Providing people with better travel options to access places for earning, learning and participating in society

14. The following RLTP objectives map to this priority:

- Providing and accelerating better travel choices for Aucklanders
- Better connecting people, places, goods and services
- Enabling and supporting Auckland's growth, focusing on intensification in brownfield areas and with some managed expansion into emerging greenfield areas

15. Consistency with the GPS approach to delivering the Better Travel Options priority outcomes is achieved by a range of initiatives within this RLTP, including:

- major investment in the rapid transit network, bus network and cycling network to accelerate mode change towards sustainable travel modes and help shape a more sustainable and attractive urban form
- major investment in maintaining and renewing the existing transport network to ensure it continues to enable people to get to places where they want to live, work and play
- major investment in key growth areas, particularly brownfields areas, with a focus on encouraging use of sustainable transport modes
- implementation of the Auckland priorities included in the New Zealand Rail Plan
- new investment to improve transport accessibility for people with accessible needs, consistent with the intent of the NZ Disability Action Plan and Auckland Accessibility Action Plan
- continued investment in specialised services to support accessibility, such as the total mobility scheme
- delivery of ATAP via the RLTP programme.

16. The Primary Outcome for better travel options is:

Providing people with better travel options to access places for earning, learning and participating in society.

17. The RLTP investment programme achieves consistency with this Outcome and its associated delivery expectations by:

- improving access to social and economic activities – particularly by public transport but also by active modes and private vehicle
- increased availability and access to public transport and active modes options
- increased share of travel by public transport and active modes
- reduced greenhouse gas emissions, when combined with government initiatives.

GPS Priority - Improving Freight Connections: Improving Freight Connections to support economic development

18. The RLTP objective of Better Connecting people, places, goods and services maps to this objective. It is also supported by the Providing and Accelerating better travel choices for Aucklanders.
19. Consistency with the GPS approach to delivering the Improving Freight Connections priority outcome is achieved by a range of initiatives within this RLTP, including:
 - Rail network investment, particularly new tracks on key Auckland chokepoints (the 'Third Main'), consistent with the New Zealand Rail Plan to enhance freight movement by rail
 - A range of corridor improvement and optimisation projects which will improve conditions for the freight and courier movements that continue to need to be made on the road network.
 - Major investment in mode choice to reduce, relative to a no-investment scenario, demand for private vehicle travel, reducing pressure on the road network and freeing up space for freight
 - A major increase in investment in renewals to ensure critical road and other links are renewed to an appropriate standard.
20. The Primary Outcome for freight is:

Improving freight connections to support economic development
21. Freight Delivery expectations are: freight routes that are more reliable; freight routes that are more resilient; reduced greenhouse gas emissions and reduced air and noise pollution.
22. The RLTP investment programme achieves consistency with the freight objective and delivery expectations by improving rail freight operations and providing a relative improvement in road freight conditions compared to a do minimum situation.

GPS Priority - Climate Change: Transforming to a low carbon transport system that supports emission reductions aligned with national commitments, while improving safety and inclusive access

23. The following RLTP objectives map to the Climate Change priority:
 - Improving the resilience and sustainability of the transport system, significantly reducing the GHG the system generates
 - Providing and accelerating better transport choices for Aucklanders
24. Consistency with the GPS approach to achieving Climate Change outcomes is achieved by a range of initiatives within this RLTP, including:
 - major investment in public transport and active modes, particularly cycling, to encourage a transformative shift to lower carbon sustainable modes and support shaping urban form and land use in a way that reduces car dependency over the long-term.

- Over half of the capital improvements programme is directed to investment in low carbon modes, while other programmes such as the optimisation and technology programmes also support emission reductions by encouraging use of sustainable modes or improving flow in congested conditions.
 - A rapid transition in investment from the recent period, which saw construction of significant state highway capacity including the Waterview Tunnel and Western Ring Route, to a future state which will see all significant road capacity construction end in around 2027.
 - Assessment using the Waka Kotahi's RCAT assessment tool shows that overwhelming majority of the RLTP programme is either climate neutral or positive. The main elements that may have a negative climate impact (while supporting other GPS objectives such as the Freight Connections priority) are either committed or funded by the Crown and are therefore unable to be addressed by the Auckland Regional Transport Committee as part of RLTP development.
- major investment to support more sustainable transport for priority growth areas, particularly in brownfields
 - funding allocations to support sustainability initiatives and encourage electric vehicle take-up, including electrification of 50% of Auckland's contracted bus fleet by 2031
 - advocacy for a range of policy initiatives to incentivise emissions reductions by improving the efficiency of the private vehicle fleet
 - an allocation within the renewals budget to address the resilience impacts of climate change.

25. The Primary Outcome for Climate Change is as follows:

Investment Decisions will support the rapid transition to a low carbon transport system and contribute to a resilient transport sector that reduces that reduces harmful emissions, giving effect to the emissions reduction target the Climate Change Commission recommended to Cabinet until emissions budgets are released in 2021.

26. The GPS delivery expectations are: Reduced greenhouse gas emissions, reduced air and noise pollution, improved resilience of the transport system.

27. In the Auckland context, the forecast 22% increase in population between 2016 and 2031 would, in a do-minimum scenario, lead to a similar sized increase in greenhouse gas emissions by 2031. However, the combination of RLTP investment¹, improved vehicle efficiency as forecast

¹ The impacts of RLTP investments are modelled using the Auckland Forecasting Centre's macro strategic model. The structure and robustness of this model has been peer reviewed by international experts, and the model has been validated to 2016 conditions on the Auckland network.

in Vehicle Emissions Prediction Model 6.1² and planned government interventions such as the Clean Car Standard and biofuels improvements are expected to lead to a small absolute emissions reduction (in the order of -1%) for Auckland between 2016 and 2031.

28. Inclusion of the figures for the Clean Car Standards and Biofuels blend is based on advice and announcements from the Minister of Transport that government is moving aggressively to introduce Clean Car Standards and to mandate a Biofuels blend³. It is therefore reasonable to assume that these will be implemented as proposed by the Government. Note the overall estimates do not include the additional reductions that could be expected from completion of the City Centre to Mangere light rail project.
29. The above figures are based on a comparison with the 2016 base year. The results therefore include the impact of projects, including the significant investment in the Western Ring Route, and population growth between 2016 and 2021 which is outside the scope of the 2021 GPS. Accounting for the rate of population growth (which is a proxy for increases in demand) relative to forecast improvements in fleet efficiency, the impact of announced government interventions and the strong emphasis on public transport and active modes in the RLTP from 2021 onwards, we are confident of a greater absolute reduction in emissions between 2021 and 2031. This reduction is estimated to be in the order of order of 5%. In the time scale of transport change, this scale of reduction represents a rapid shift from the nine years between 2009-2018⁴ which saw an 11 percent increase in emissions.
30. Forecast emissions reductions are consistent with the priority of 'Transforming to a low carbon transport system that supports emissions reductions that align with national commitments.' They are also consistent with key elements of the Primary Outcome – particularly:
- *supporting* a rapid transition to a low carbon transport system and
 - “*contributing* to a resilient transport sector that reduces harmful emissions, giving effect to the emissions reduction target the Climate Change Commission (CCC) recommended to Cabinet until emissions budgets are released in 2021”.
31. Forecast emissions reductions are, however, likely to be less than the CCC's emission budget in its advice to the Government. Nevertheless, as required by the Primary Outcome the investment decisions as incorporated in the RLTP do *contribute* to and support this outcome. In addition, as the points below illustrate, there is little ability to further reduce overall emissions through RLTP direct investment in infrastructure and services.

² The Vehicle Emissions Prediction Model (VEPM) has been developed by Waka Kotahi and Auckland Council to predict emissions from vehicles in the New Zealand fleet under typical road, traffic and operating conditions. The model provides estimates that are suitable for air quality assessments and regional emissions inventories

³ Government support for the Clean Car Standard and biofuels improvements, along with forecast scale of effects, has been outlined in the correspondence to the Mayor of Auckland, along with the ATAP media release and confirmed in recent correspondence with the Ministry of Transport. The scale of reductions from the Clean Car Standard and Biofuels changes is based on the average & medium point for estimates provided by Ministry of Transport officials, which correspond to the figures advised by the Minister of Transport. The Ministry noted that the estimate for biofuels are indicative only. Using the range advised by the Ministry, the estimated change in vehicle emissions compared to 2016 is between +2 and -4% and the estimated change compared to 2021 is between -3 and -8%.

⁴ This is the most recent CO₂e emission data we have available.

- Fundamentally, investment in infrastructure or services only has a very minor impact on total emissions, whether positive or negative. Even the biggest projects may only account for changes in the order of one percent of total. Scenario testing as part of ATAP development, along with analysis of other scenarios as background to the Te Tāruke ā Tāwhiri (Auckland Climate Plan), shows that plausible changes to the programme are unlikely to yield materially different results. External variables such as demand associated with population growth or improvements in fleet efficiency have a much larger impact on total emissions.
- With the possible exception of a Crown allocation to complete the City Centre to Mangere light rail project, no further funding appears likely for additional sustainable modes. Assumed funding from the NLTP is already at the \$16.3 billion allocation set out in the GPS. Meanwhile, Council funding for additional public transport services is also limited, with the final allocation being smaller than desirable (although increased on the original draft).
- There is limited practical scope to relocate elements of the programme from roading projects to further increase investment in public transport and active modes. The bulk of major roading projects included in the RLTP are either committed or included in the NZUP programme, which cannot be altered by the RTC.
- It is not a given that roading projects will automatically lead to increased tailpipe emissions. For example, Penlink is likely to result in a net reduction in tailpipe emissions as it significantly shortens the connection to the North Shore and reduces congestion while managing demand through tolling. As an illustration, a modelling test for the 2031 year shows that removal of the Penlink and the full Mill Road project (as originally announced in the NZUP package) would lead to a very small (0.15%) increase in CO2 emissions due to an increase in total VKT and higher congestion⁵. Remaining projects will also make important contributions to other objectives including safety, connectivity overall effectiveness and freight access – or may be multi-modal in nature.
- General road space reallocation towards cycling and other sustainable modes has also been proposed by submitters as a way of addressing climate issues. This is already occurring as part of the wider cycling programme and projects such as Connected Communities that will provide for bus lanes, bus priority and cycling and safety improvements. As noted, there is no available funding for further reallocation. In practice, it is also likely that gains from deterring car travel through lane reallocation alone would be largely offset by the increase in emissions associated with increased congestion⁶ and diversion amongst the remaining traffic. Reallocation of general traffic lanes without additional effective alternatives (which cannot be funded) would also materially reduce the RLTP's contribution to LTMA objectives around effectiveness and economic, social and cultural public interests.

32. Although there is limited scope to further reduce emissions through RLTP investment, we anticipate further interventions from government, beyond the already announced clean car standard and biofuels, that will support achieving the Climate Change Commission budgets. These further interventions are discussed below.

⁵ The test assumed that all other variables are held constant

⁶ For example, the Vehicle Emissions Prediction Model shows emissions per kilometre increase significantly as average traffic speeds get closer to zero – especially with heavy vehicles.

33. In terms of delivery expectations, as discussed above, we expect to see an absolute reduction in emissions (between 1% and 5%) between 2021 and 2031. Relative reductions in air⁷ and noise pollution and relative improvements in transport system resilience are also expected under the RLTP investment programme.

Further emissions reductions from likely future policy initiatives

34. Further emissions reductions are expected as a result of additional government policy interventions. These will be necessary as the investment allocation and direction outlined in the GPS itself does not achieve the transport sector contribution to national commitments under current policy settings. For example, the CCC's base case, which presumably includes the effects of transport investment consistent with the GPS, anticipates a 6 percent increase in national transport emissions between 2016 and 2031 without new tools. The Hikina te Kohupara reference case also anticipates similar increases over the same period.

35. In practice, it is clear that achieving the GPS priority of 'Transforming to a low carbon transport system that aligns with national commitments and CCC emissions budgets at a national level depends on additional major national scale policy interventions that have yet to be put in place by government. This is evident from paragraph 72 of the GPS, which anticipates further elements in a Transport Emissions Action Plan as follows:

“the outcomes for the Climate Change strategic priority in GPS 2021 Reflect the Government’s move towards setting emissions budgets to make sure New Zealand achieves its emission reduction goals. The independent Climate Change Commission (the CCC) is developing emissions budget which will set a cap for emissions in five-year periods (2022-2025, 2026-2030 and 2031-2035). The CCC will provide advice on the direction of policy required for an emissions reduction plan for the first budget, by February 2021. The government will respond with its plan to achieve the first budget by 31 December 2021. All investment decisions will need to be consistent with the transport component of that plan, which will be informed by the Transport Emissions Action Plan.”

36. The reliance on further policy initiatives is also clear from the CCC's draft emissions budget and the Hikina te Kohupara modelling, which both depend on major new policy initiatives to achieve emission reductions targets. For example:

- the CCC's draft emissions budget has proposed new policies to incentivise much faster uptake of electric vehicles as a key part of its transport programme
- Hikina te Kohupara canvasses significant changes, including EV incentives and distanced based pricing, as key mechanisms to achieve transport emissions budgets. Meanwhile, the release of the document itself demonstrates that government expects further policy changes are required.

37. The implementation of the type of new climate change policies that can have effect at scale is beyond the scope of the RLTP as an investment programme or even local government more generally. The GPS recognises this situation, noting “Government should lead [on the reduction of

⁷ Some types of air pollution are expected to reduce dramatically as a result of more of the vehicle fleet meeting Euro 6 standards.

greenhouse gas emissions] because it has a range of tools available to reduce land transport emissions from regulations and standards to direct investment, urban planning requirements and incentive schemes”.

38. In an Auckland specific context, the Minister of Transport’s ATAP media release also provides confirmation of further policy intervention, stating that:

“To achieve meaningful reductions, changes are required in the vehicle fleet which require wider Government policy levers to be implemented to encourage electric and hybrid private vehicles.

As Government we are developing multiple policies in order to achieve forthcoming emissions budgets and the long-term goal of net zero CO2 emissions by 2050 as required under the Climate Change Response Act 2002. We recently introduced a CO2 reduction in light vehicle imports by 2025 (the Clean Car Standard), to introduce a biofuel mandate in principle, to decarbonise the public transport bus fleet by 2035.”

39. Overall, given the CCC’s carbon budget process and Government’s commitment to further policy initiatives, emissions reduction outcomes well in excess of the current modelled forecasts can be expected. For example, implementation of the EV incentives outlined in the CCC’s draft advice would see Auckland’s transport emissions reduce by a further 12 percent by 2031 beyond the reductions discussed above. T. Consequently, we can be confident that the additional policy initiatives signalled by government will further support the initiatives in this RLTP towards achieving the GPS Primary Outcome for climate change, including CCC budgets.

Government agreement to ATAP implicitly supports consistency of the RLTP with the GPS

40. Based on the above, it can be concluded that the RLTP is consistent with the GPS. In addition, the ATAP process and its incorporation within the GPS is consistent with this conclusion. ATAP is an aligned strategic approach between Government and Auckland Council and is recognised in the GPS as a key element of delivery of GPS outcomes in Auckland.

The GPS identifies ATAP as an aligned strategic approach between Government and Auckland Council

41. This RLTP is guided by and aligned to the ATAP programme agreed by Cabinet and Auckland Council for 2021. In its summary of key policy direction documents, the GPS describes ATAP as follows:

The Auckland Transport Alignment Project (ATAP) is an aligned strategic approach between the Government and Auckland Council to develop a transformative programme that addresses Auckland’s key challenges over the next 30 years. The GPS makes explicit reference to supporting ATAP 2018 projects. The RLTP for Auckland is fully aligned with ATAP 2018 and the NLTP must give effect to the Government’s priorities that for Auckland [sic] are embodied in the ATAP package.

42. As noted, delivery of ATAP is identified as one of the key expectations of the GPS and is highlighted as a key means by which the GPS expects to achieve its outcomes. The GPS makes explicit reference to supporting ATAP 2018 projects. In particular, the GPS indicates funding to give effect to the Government’s commitment to the next ATAP will be factored into future GPS updates. So, given Cabinet agreement to the 2021 ATAP, we expect to see the same support for ATAP 2021 in future GPS documents.

MOT involvement in development of the ATAP investment programme and Cabinet endorsement

43. The 2021 ATAP report states that the Auckland Plan and GPS provide key strategic direction to ATAP. This key strategic direction is reflected in the agreed ATAP objectives around responding to climate change, growth, better transport choices, safety and connectivity outlined above. These objectives were developed in conjunction with the MOT officials, endorsed by a Governance Group with the MOT's Chief Executive and finally agreed by the Minister of Transport via the ATAP Terms of Reference.
44. Like the ATAP objectives, the agreed ATAP investment programme was developed through a joint working group lead by the MOT, with Waka Kotahi as a core party, and overseen and agreed by a Governance Group jointly chaired by the Chief Executive of the MOT and including the Chief Executive of Waka Kotahi.
45. The ATAP package was then agreed by Cabinet after advice on the expected outcomes, including emissions. The core involvement of MOT officials in developing the ATAP programme and its agreement by Cabinet provides a reasonable basis to assume that the ATAP programme is consistent with Government's policy objectives, implicitly including the GPS.
46. This is further reinforced by the Minister of Transport's request that officials progress work on funding rules to enable full utilisation of the GPS 2021-31 commitment of \$16.3 billion for Auckland – essentially to implement the 2021 ATAP programme. This includes modifying the 2024 GPS to increase the allocation to Local Road Maintenance Activity Class.
47. As the LTMA requires that the Waka Kotahi ensure approval of funding for activities is consistent with the GPS, and the ATAP programme was supported by the Waka Kotahi along with the Minister and Ministry, it is reasonable to assume these agencies considered the ATAP programme to be consistent with the GPS. Otherwise, the resulting RLTP and NLTP would not meet legislative requirements. This can reasonably be taken into account as supporting the overall conclusion that the ATAP programme is consistent with the GPS.
48. The RLTP investment programme is directly aligned to the ATAP investment programme and achieves the same results. Therefore, Cabinet and central agency support for ATAP is consistent with a conclusion that the RLTP is consistent with the GPS. However, given the evaluation above, the RLTP is consistent with the 2021 GPS in any event.

Summary

49. In summary, the 2021 RLTP is consistent with the 2021 GPS as it:
 - seeks to achieve a set of objectives that are consistent with the four GPS investment priorities
 - follows an investment approach that is consistent with the GPS
 - is forecast to achieve outcomes that are consistent with the Primary Outcomes and delivery expectations included in the GPS.
50. This conclusion is consistent with the fact that the RLTP itself derives from the ATAP programme, which was:
 - Developed in conjunction with the MOT and Waka Kotahi and proposed to Cabinet, indicating that these agencies considered the RLTP to be consistent with the GPS

- Agreed by Cabinet, who were advised of the anticipated results, which supports the overall conclusion that the ATAP programme, and thus the RLTP, is consistent with the GPS.

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>(b) have considered—</p> <p>(i) alternative regional land transport objectives that would contribute to the purpose of this Act;</p> <p>(ii) the feasibility and affordability of those alternative objectives</p>	<p>The RTC approved the regional land transport objectives at its meeting of 29 October 2021. Those objectives were identified following an Investment Logic Mapping process undertaken through the Future Connect project. The ILM process considered alternative objectives, and alternative formulation of objectives. The RTC considered the objectives and added an additional objective of ‘Sound Asset Management’.</p> <p>The feasibility and affordability of this objective was considered in the context of additional investment needed to ensure an appropriate and sound level of asset management.</p>
<p>(c) have taken into account any—</p> <p>(i) national energy efficiency and conservation strategy; and</p>	<p>The NEECS 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"> • inclusion of programmes to decarbonise the PT fleet (the conversion of 50% of the bus fleet to electric/ hydrogen-powered by 2031), starting to decarbonise the ferry fleet, electrification between Papakura and Pukekohe and new electric trains) • Projects to expand the reach and capacity of the Rapid Transit Network, supporting greater intensification around transport hubs • Programmes to support ITS • Projects that support freight and passenger movement by rail <p>The EV take-up target in the NEECS (Electric vehicles make up two per cent of the vehicle fleet by the end of 2021) relates to the full vehicle fleet. However, the RLTP contains programmes and possible policy levers to support the uptake in EVs and advocates for further action in this area.</p>
<p>(c) have taken into account any—</p> <p>(i) relevant national policy statements and any relevant regional policy statements or</p>	<p>The National Policy Statement on Freshwater Management 2020. The NPS on Freshwater Management was released during RLTP development. NPS objectives around improved water quality were taken into account via the “Improving the resilience and sustainability of the transport system, significantly reducing the GHG the system generates” objective. The RLTP sets out a range of initiatives to improve water quality, including via general mode change and specific water related</p>

<p><i>plans that are for the time being in force under the Resource Management Act 1991; and</i></p>	<p>initiatives and includes a target to reduce the impact of runoff from Auckland’s busiest roads. Further work underway to identify more specific responses to the revised 2020 NPS.</p> <p>The National Policy Statement on Urban Development’s objectives around urban form and greater density taken into account via the “Enabling and supporting Auckland’s growth, focusing on intensification in brownfield areas and with some managed expansion into emerging greenfield areas” objectives. The relationship between this policy statement and development of the rapid transit network is specifically discussed in the RLTP in the section “Rapid transit and the National Policy Statement on Urban development”.</p> <p>Auckland Unitary Plan - Development of the RLTP has taken account of the Auckland Unitary Plan in that the RLTP objectives, investment programme and outcomes align with the transport objectives in the AUP of</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><i>The expected form of land use under the Auckland Unitary Plan has also been a key input to development and modelling work for the RLTP, along with identification of priority growth areas.</i></p>
<p><i>(c) have taken into account any—</i></p> <ul style="list-style-type: none"> <i>(i) likely funding from any source</i> 	<p>The RTC has considered the funding sources through the development of the draft RLTP investment programme. This consideration is set out in the RLTP:</p> <ul style="list-style-type: none"> • Section 8 sets out the likely funding sources. • RLTP reflects the ATAP investment programme and the funding commitments from the Government and Council.

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| | <ul style="list-style-type: none">○ The Government's funding commitment is in the GPS (for ATAP 2018), with an expectation that the funding commitment for 2021 will be reflected in a future GPS.○ AT's capital and operating investment has been made consistent with AC's LTP.● The RLTP indicates how AT's capital programme will be amended if funding shortfalls arise. |
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