

Engineers for Social Responsibility Inc. Submission to the Draft Auckland Regional Land Transport Plan 2021 - 2031

Engineers for Social Responsibility Inc. is of the firm view that the Draft Auckland Regional Land Transport Plan 2021 - 2031 (Draft ARLTP 2021) should not be finalised. Instead it should be put on hold and revised when the Central Government has developed clear climate change policies and interim targets following finalisation of the Climate Change Commission's Draft Advice for Consultation. We anticipate that this revision process would be complete within 3 years.

In the interim, a decision is needed on implementing congestion pricing instead of yet more studies, and much higher priority must be given to developing and implementing actions which start to make the major reductions in Auckland's emissions required.

Climate change is one of, if not the most important issue facing the world today. The Climate Change Commission 2021 Draft Advice for Consultation (CCC Draft Advice) sets out a pathway for New Zealand to achieve the required net zero emissions by 2050. A significant and ongoing reduction in transport emissions is essential to achieving the required reductions in greenhouse gas (GHG) emissions.

The Draft Advice for Consultation states that National Transport Emissions (which include domestic flights, rail and coastal shipping) should reduce by 47% by 2035 with a 19% reduction in transport emissions by 2030 (relative to 2018). In addition, it has the average travel distance per person reduced by 7% by 2031; overall household travel distance (by car) staying relatively flat; half of all light vehicle travel to be in electric vehicles (EVs) and 40% of light vehicle fleet to be EVs by 2035. Auckland has a key role to play in this process and must contribute at least its share to the necessary GHG reductions.

However, it is important to note that the emissions reductions proposed in the CCC Draft Advice report are not nearly strong enough to meet the emissions reductions of 45% below 2010 levels by 2030, that the IPCC said in their 2018 report were required to meet the Paris Agreement of holding global temperature increases to under 1.5°C compared to pre-industrial times. Hence, when the Commission comes out with their final recommendations, we can reasonably expect that they will involve budgeting for considerably higher emissions reductions than are covered in their draft report.

Auckland Council's Climate Change Plan, December 2020 includes a 14% reduction in CO₂ emissions by 2030 due to a shift to public transport, walking and cycling, and a 10% reduction in CO₂ emissions by 2030 due to remote working and reduced trip lengths. The Plan also has the total travel by private transport reduced by 12% by 2050. According to the Draft ARLTP 2021, the CCC Draft Advice's aim to halve Auckland's GHG emissions by 2030 means that the region's transport emissions would need to reduce by 64% by 2030 compared to 2016.

The Draft ARLTP 2021 has a total expenditure of \$31.4 billion over the 10-year period. The Draft ARLTP 2021 projected outcomes ("results") have overall vehicle kilometre travel (VKT) **increasing** between the 2016 base year and 2031 "in line with the expected 22% increase in population". The Draft ARLTP 2021 states that what is needed is for the total VKT to remain at the 2018 level (15.4 annual billion-km). GHG emissions per capita are projected to decrease by 13% over this period. However, the projected 22% increase in population over the same period means that the region's total emissions are expected to **increase** by 6% between 2016 and 2031. **These results are not**

aligned with either the CCC Draft Advice or the Auckland Council Climate Change Plan, and are certainly not in keeping with the emissions reductions that the IPCC says are needed.

The “agreed objectives” of the Draft ARLTP 2021 include the following “Improving the resilience and sustainability of the transport system, significantly reducing the GHG emissions the system generates”. It clearly fails in meeting this objective.

The Draft ARLTP 2021 makes a number of statements which are intended to explain the reasons for its inadequate performance in meeting the above climate change and emission reduction objectives. These include the following:

- In the context of the CCC Draft Advice, the Draft ARLTP 2021 states that “the final advice and Central Government’s response to it is critical to tackling climate change”. Also, “the way to successfully execute the transition (to a carbon neutral future) is both complex and unclear”.
- The approach set out in the Draft RLTP 2021 is “broadly consistent with” the CCC draft Advice themes, “but far more needs to be done to reach Auckland Council’s climate change emission targets”.
- “additional measures are needed that are beyond (the Draft ARLTP 2021’s) scope to implement”.

We suggest that finalising a transport strategy which fails to achieve our national and regional emissions reductions targets for the reasons outlined above is not in the best interests of ratepayers and the public. It creates a significant risk that significant funding will be directed towards projects that will not provide sufficient return on investment over coming decades. Any infrastructure project attracting current investment must be able to demonstrate clear benefits to a future zero-carbon economy. If not, the investment is not future-proof for the next 10 years, let alone the longer term. For example, over-investment in roads is a particular risk.

The Draft ARLTP 2021 points out that the accelerated uptake of electric vehicles is vital to reduce road transport emissions. The document outlines a range of strategies to support this uptake, but is vague on what will be done and when. Specific projects need to be designed and fast-tracked for inclusion in the final ARTP. These projects should include, but are not limited to, the following:

Congestion pricing: Measures to potentially achieve a 50% reduction in total emissions include road pricing “for demand management purposes” and the accelerated take up of EVs with purchase incentives”. Congestion pricing has not, however, been included in the Draft ARLTP 2021. By way of explanation, it is stated that “ongoing investigation work is required” despite several previous investigations into congestion pricing over many years.

Urban re-form: The Draft ARLTP 2021 quotes The Climate Change Commission’s 2021 Draft Advice for Consultation which states that “we need to change the way we build and plan our towns and cities.” The ARLTP 2021 needs to rapidly develop a clear strategy for this, which is fully coordinated with Auckland Council plans. Important aspects of this would include the development of major public transport nodes at 5-6 urban centres across the city, with arterial routes feeding these. Rapid transit would also be provided to allow for transport between these nodes. This differs from the strategy of having most public transport networks radiating to and from the CBD. Clear and co-ordinated strategies also need to be developed for increasing urban density around public transport nodes.

Expanding car-sharing pilots throughout the city: A move towards accessing shared motor vehicles as a service would achieve significant cost and emissions reductions benefits for the

community, compared with the current practice of private ownership. The Draft ARLTP 2021 talks about “providing charging infrastructure for 21 car-share chargers”, and there is clearly an opportunity to expand on this. If most people had access to a rentable EV parked at a public car share charger located within 400m of their residence, this could significantly change vehicle purchasing habits. AT could support this by developing charging station designs and making contestable funding for installation available to suburban communities on an equitable basis.

The Draft ARLTP 2021 has been prepared in the absence of Central Government policies, plans and funding for effectively tackling the climate change challenges New Zealand and Auckland faces. In addition, Auckland Council “needs a Climate Plan for its transport system which sets out the preferred pathway to meeting the Council’s emissions targets”. Consequently, there is no means of verifying whether the Draft ARLTP 2021 is compatible with achieving the current Central Government Climate Change objectives for 2050, nor is it possible to identify the changes to the Draft RLTP 2021 that may be needed to deliver the required GHG emissions reduction by 2031.

Under these circumstances finalising the Draft ARLTP 2021 should be postponed until the CCC Draft Advice is finalised and the Central Government has developed firm climate change policies and actions including interim targets. Once these are in place, Auckland’s RLTP and associated transport plans can be evaluated against the adopted pre-set climate change targets, and appropriate changes can be identified. Only by doing so can there be any certainty that the ARLTP is consistent with and supports a future where climate change objectives and interim targets can be achieved.

A three-year delay should be sufficient provided Central Governments acts quickly and decisively. It is unlikely to have a significant short-term effect as funding is or can be made available for committed transport projects underway or scheduled to commence over that period. During this period, a much higher priority should be given to developing and implementing actions which will contribute to making the major reductions in Auckland’s emissions essential to our future.



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