

Auckland City Centre Resident's Group

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

Every infrastructure decision is inevitably a climate decision – this is entirely applicable to Transportation.

What we spend our money on, is what we value.

This RLTP with its 10-year time frame, is the most important transport spending plan for climate for Auckland.

While there are some good projects in the plan, it fails to deliver cycling infrastructure at anything like the rate required, and it fails to reduce emissions in line with our commitments.

The overarching aim must be to decarbonise our transport system.

Our view on this draft RLTP is that these proposals will not achieve this, and therefore do not recognise the urgency of our climate change situation.

This plan won't reduce emissions by 2030 despite the city committing to halving its carbon footprint. In fact, it is expected that transport emissions may **increase** by 6 per cent by 2031.

For some years now, Auckland Council's aim has been to reduce transport emissions – yet the business-as-usual transport plans the Councillors are regularly asked to approve do the exact opposite. This one is little different as it may actually lead to an **increase** in emissions.

Transport is Auckland's biggest source of emissions, at around 40%, it's the fastest rising source of emissions, and it also has an outsize impact on our daily lives – this is utterly clear in the city centre where we live, which regularly has the worst air quality, especially black carbon, in NZ.

The Government Policy Statement on Land Transport (GPS) lays out four strategic priorities, one of which is climate change:

Developing a low carbon transport system that supports emissions reductions, while improving safety and inclusive access.

To meet the GPS requirements, the draft RLTP must lay out a plan for a low carbon transport system and not just be an "electrified" version of what we currently have. Reducing emissions needs to involve systems change, which also fundamentally would address safety and inclusive access outcomes.

The draft RLTP also minimises the improved travel options and access possible from other decarbonisation pathways:

*Because the adoption of EVs cannot happen quickly enough to deliver the required reductions by 2031, meeting the Council's target would require very strong interventions to reduce demand for private vehicle travel. Potential examples include road pricing schemes that would dramatically increase the cost of driving. **While such an approach would achieve climate outcomes, perverse social, cultural and economic outcomes would also be expected under settings this strong.***

The statement is incorrect. We understand how it will appeal to those fearful of faster and more fundamental change, but it is a serious misrepresentation of the decarbonisation options available to Auckland. Road pricing is not the "very strong intervention" that is required; it can be part of the solution if it accompanies other much more major tools within an equitable framework of systems change. The above statement about "perverse" outcomes ignores the more fundamental systems changes that have long been needed to deliver better social, cultural and economic outcomes. Reducing transport emissions is a co-benefit of these holistic systems changes. Indeed, reducing demand for private

vehicle travel is best achieved in a way that is primarily designed to deliver better social, cultural and economic outcomes.

What we must do is reduce traffic volumes by putting vehicle kilometres travelled (VKT) reduction at the core of travel demand management, by using every lever available.

This draft RLTP does not attempt to reduce traffic volumes, but instead show it continuing to rise.

Sprawl must be discouraged, and if not then public transport and active modes must be installed to service those greenfield developments first. More roads only create more traffic, and new roading for housing development comes at a direct cost to sustainable transport and the environment.

Achieving a “quality compact urban form” was an underlying principle of the Auckland Plan, and the Unitary Plan, key strategic plans out by the council in its first two terms, with public backing. This focus must be maintained.

It seems so much easier to find money for capital improvements (if it supports sprawl) than to find money for operating expenses (such as for a better bus network to support the existing population). This needs to change.

Reduce PT costs

In a climate emergency all levers must be applied to shift transport modes from single occupancy vehicles. When AT’s own modelling shows that rising PT costs decrease PT use, then costs must come down, not go up as is currently occurring every year by up to 10%.

The Auckland Climate Plan requires 64% transport emissions reduction by 2030. Applied today his would require 2/3 petrol stations closed. 2 out of 3 of the existing cars no longer being driven. How does the RLTP plan to achieve this? Answer – it doesn’t as it doesn’t provide the most meaningful practical policies.

The RLTP doesn't even mention cycling as a solution to climate change, and claims "perverse social, cultural and economic outcomes" if we actually pull the levers on climate action, whereas in reality those things will be the result of failing to act on Climate Change in meaningful ways right now.

EV’s do provide some air quality benefits but these are undermined by factors relating to their production, the plastic discharge to the environment of their tyres and brakes like any other ICE vehicle, disposal and the obvious kickers – they take up as much space as any other vehicle, and will continue to kill and maim 100’s every year.

Transitioning our vehicle fleet to EVs over the next 8 years is estimated to cost about 25 billion dollars, that's the cost to electrify half of domestic vehicles (public transport and heavy vehicle cost not included), and won't even achieve our emissions aims. It's simply not a solution.. Nor is the cost of supporting infrastructure. It won't solve congestion, either - in fact, it will probably make things worse.

A safety programme.

This should no longer be a “programme” but instead the overarching principle that shapes strategy and decides whether projects and programmes are even included. Safety is the backbone of both mode shift, and of creating liveable places to complement intensification.

The draft RLTP overstates the safety improvements possible through electrification. Yes, EVs, may provide better ANCAP ratings, and may be quieter – but this also brings a heightened crash risk to vulnerable road users. EVs also have the benefit of lower operating costs, so we might expect this will lead to increased driving, which in turn increases the safety risks to other road users. So ANCAP are not a complete picture of the safety situation - it ignores the safety achieved via mode shift to active modes.

Also, “safer vehicles” is only one strand of the Vision Zero approach, which has been poorly summarised in the draft RLTP and does not mention the core tenet of Vision Zero - the “primary emphasis on system designers” - which requires more attention to:

- move mode shift away from driving, which is the mode that causes the most DSIs, to PT & active transport, the safest modes for all road users
- Moving responsibility away from bus, truck or taxi/rideshare drivers to the companies employing them to be safe and compliant
- Safe systems such as temporary traffic management that is focused on the safety and amenity of the most vulnerable road users
- Safe operations such as enforcement and responses to network failures by prioritising the safety of vulnerable road users
- Safe road rules rewritten with the needs of a vulnerable road user at their core
- Safe regulations, design manuals and monitoring systems
- Planning methods that prioritise short distance, active trips over long distance trips requiring motorised vehicles

Reducing Vehicle Kilometres Travelled (VKT)

Reducing VKT must be an immediate goal and therefore must be a key metric of the RLTP. However, the draft RLTP opposes this and states that we can only try to accommodate future growth in travel demand via sustainable modes, not to reduce VKT – this attitude needs to change. Council’s own, agreed Climate Plan sets a specific target of vehicle kilometres travelled being reduced by 12%, therefore this the bare minimum that should be in the draft RLTP.

The GPS also lays out how this can be achieved:

“Mode shift in urban areas from private vehicles to public transport, walking, and cycling will support efforts to reduce emissions”. And the GPS’s requirement: “Investment decisions will support the rapid transition to a low carbon transport system”.

Both Council and the Government have directed Auckland Transport to reduce vehicle km travelled (VKT) and not just attempt to hold it steady, clearly contradicting Auckland Transport simply declaring that we need to “hold VKT steady” so that electric vehicles can then reduce emissions.

However, underlying that is the question of what drives transport emissions and the answer is *poor planning and investment decisions*.

A major component of traffic volumes is road capacity. Yet the draft RLTP discusses projects that increase road capacity as if they are improvements.

Capacity increases are not improvements, they are methods for increasing traffic.

Walking Priority

The yearly figures on the appendix A are most alarming pushing out essential cycling and walking expenditure out a further year – These need to be brought forward to Year 1.

Only \$49 million for new footpaths for all of Auckland over 10 years, is not nearly sufficient.

Allocate 10% of the total transport capital budget for pedestrian infrastructure, (and a further separate 10% for cycling projects).

Much more attention must be paid to both the environmental and health and well-being benefits walking brings. Sitting in an electric car is still sitting in a car. By encouraging walking and cycling, we can not only reduce emissions, but improve public and personal health and the ‘liveability’ of our city.

Walking works well when combined with public transport. Please prioritise create better, safer walking connections between where people live, work, shop and go to school, and public transport routes.

Our cities can and should be places where nature flourishes. Let’s make as many footpaths as possible greenways, not concrete jungles.

Short walking trips replace long car trips to work once people get sick of the long commute. Short walking trips replace medium length shopping trips once people start shopping locally. Short walking trips replace being chauffeured. Short walking trips replace short driving trips.

These shifts happen when Low Traffic Neighbourhoods are provided. Or when walkability is improved. It requires safety, which is a fundamental right. And something we're not currently providing.

A complete low traffic neighbourhood (LTN) plan

Low Traffic neighbourhoods that encourage walking and other active modes for those 2-3 km trips are required throughout the entire city, including industrial areas, within the decade.

LTNs are good transport planning where we divide the city into blocks where the streets are quiet and for access only, with no through-traffic. This is a cheap way to re-create a healthy road system, lower traffic volumes and enable mode shift and reduction in car use if not ownership.

Right now, our streets are dominated by cars, and that means everything else tends to end up on the footpath, making life difficult for many pedestrians and people with disabilities. More people will choose to walk if we make footpaths safer and less cluttered. We need much more investment in safe footpaths for people on foot and users of low-speed mobility devices, and investment in safe, separated cycle lanes for bikes, e-bikes and e-scooters.

LTN's reduce traffic, improve air quality, drastically cut injury crashes, and they are the single most effective method of increasing active travel.

This is a system that can deliver on our safety, health **and** climate.

Access for Everyone (A4E) – for the city centre this is a core part of the City Centre Masterplan.

<https://www.aucklandccmp.co.nz/access-for-everyone-a4e/vision-for-a4e>

A4E was specifically developed to address the future disruption from the CC2M light rail project and enable Auckland Council's city centre priorities.

It is on the main driver of the City Centre Master Plan refresh which was adopted by the Planning Committee on 5 March 2020 – and the RLTP also needs to focus some energy and budget on delivering what is in the CCMP, and A4E can be rolled out across the city metro and village areas..

Safe cycling networks

An Auckland Cycling Network was approved by Auckland Council in 2012.

A full 70% of this network was supposed to have been delivered by 2020, with the remaining 30% delivered by 2026. Clearly this has not been achieved. An AT Board report late last year stated Auckland achieved ZERO percent Mode Shift towards cycling and transit between 2013-2018.

This full Auckland Cycle Network should be completed in the first half of the decade, so its completion date is as originally intended. Auckland Transport's claim that this would be too expensive is based on their misconceptions about the value of cycling infrastructure as a way to reduce emissions. We simply cannot ignore the enormous climate, health, community, and amenity positive outcomes that cycling provides.

The yearly figures on the appendix A are most alarming pushing out essential cycling and walking expenditure out a further year – These need to be brought forward to Year 1

Allocate 10% of the total transport capital budget for cycling projects.

This is needed throughout the entire city, including industrial areas, within the decade.

Tactical methods should be used to enable quick progress.

Public Transport Improvements

The rapid transit and public transport programmes are really pretty good and positive. Some of them are expensive because instead of using road reallocation to provide the corridors for the buses or light rail - as they have been instructed to do – there is an insistence in this draft R:TP on widening corridors. The

expense, therefore, is a result of retaining driving capacity, whereas Auckland Transport can and should be reducing vehicle km travelled. This would make public transport projects much cheaper.

A world class public transport network within the decade

All the public transport in RLTP should be brought forward to the first half of the decade, and other projects to provide bus priority at scale, involving road reallocation to prevent road widening costs, but also circulation plans that reduce traffic - should begin planning work now, for implementation in the second half of the decade.

Bus Network

It needs frequent all day service now, and priority for the buses across the network along main routes and arterials.

Bus networks must feed into high quality prioritised rapid transit hubs. This means both the Congestion Free Network and improvements to every bus route, by making best use of the infrastructure we already have. This does not mean more traffic lane-saturated projects like Ameti, but it does mean bus priority, reducing traffic volumes and a rapid increase in frequent services throughout the day, across the whole urban area. No more spreadsheet-driven decisions about minor changes.

The move to all electric must be sped up.

Improving non peak bus frequencies to enhance the network reduces the need for car ownership and reduces VKT.

Rail network improvements.

Auckland's rail network needs significantly more investment, with improved railway networks providing hubs for local bus networks to feed into. We cannot continue to cram bus routes into the city centre, and have wall to wall buses there – electric or otherwise – this is not the vision of the city centre masterplan. Removal of “level crossings” – where roads cross railways at the same level.

Parking strategy

Rather than reduce parking supply, the draft RLTP proposes to increase supply and proposes:

Over \$50 million to deliver new and extended park and ride facilities across the region, including in locations that support Auckland's growth.

This issue needs tackling head on, with consistent, evidence-backed action and communications. Council land vested in parking is a significant public asset, and there's too much of it. To achieve Council's goals of mode shift, equity and a liveable city, parking needs to be reduced and the land put to better uses. All remaining parking needs to be properly priced (public) or levied (private) to encourage mode shift and provide an equitable revenue stream. Much of the good stuff in the existing Parking Strategy has been ignored – by both Council and Auckland Transport.

Collecting revenue by pricing parking lots AT control and using it to prevent PT fares from having to rise, and even lowering them a bit, reduces VKT.

Parking Enforcement

This needs a complete makeover – the current abrogation of duty regarding berm and footpath enforcement is destroying our parks, footpaths and safety. The city needs AT to modify bylaws to meet community and policy expectations and then to use proactive enforcement, in which all vehicles in an area are ticketed at once. The technology is clearly available with roving cars and cameras. This would safely tackle the explosion of illegal parking in a way that provides far better value for money, allowing far more enforcement and public safety to be provided per dollar.

Road Safety

It's no exaggeration to say that Safe streets have the potential to drastically cut visits to emergency departments and save ACC and health services billions of dollars, every year.

Speed limit enforcement, red light running. These are endemic and increasing in the city centre with almost no attempt to tackle this. This requires a major investment in technology. Eventually GPS linked speed and access geo-fencing and speed reduction tech must be introduced as we have done for scooters.

Major road reallocation

The arterial roads need lane reallocation (rather than expensive property purchase) to create space for safe cycling, buses, wider footpaths and trees. Widening road corridors to create lengths of extra lane before or after intersections is a way to increase vehicle throughput. And in each project, making changes without adding cycle lanes or missing pedestrian legs is also wasting the opportunity to make real improvements.

The draft RLTP speaks of 'Optimisation programmes'

*...improving the efficiency and **coordination of traffic signals to improve throughput and reduce delays, using dynamic traffic lanes to improve peak traffic flows...***

Yet the increases in traffic that the optimisation programme create would undermine improvements intended for walking and other active modes.

Reallocating street space from parking and extra turning lanes and flush medians to cycling lanes, wider footpaths and trees for walkability reduces VKT.

Facilities programme

Drinking fountains, toilet facilities, lockers, bike storage, seating, HOP vending and top up machines and other facilities along all arterial roads, bus routes and at train stations.

Intersection repair programme

To remove slip lanes and retrofit intersections with safe cycling infrastructure, easily accessed bus stops, wider footpaths and better crossings.

Default Safer Speeds

Auckland needs 30 km/hr speed limits or lower by default, except where evidence exists that higher speed limits are safe – such as on motorways. The government has signed an international commitment to do this. Instead of continuing to dismiss this concept, it is time for the Councillors to get their heads around the rapid and wonderful mode shift, freedom and liveability this default speed change will bring. And around the economic stimulus it will give to businesses with sustainable business models – instead of to those who expect us to sacrifice safety for their profits.

Maintenance and Renewals

The draft RLTP renewals budget is bloated, and will absorb a large portion of the budget, because our road building programmes and sprawl is the business-as-usual approach since forever.

We are shown attractive images, and roading described as "starting off environmentally friendly and beautifully planted". This is greenwashing, with no indication that this is what will be delivered. No more vehicle-centric 'like for like. Like for like is a choice – the wrong choice for today and tomorrow.

All road renewals should be focused on adding safe space for cycling, on making walking safer and easier, and on giving buses priority over general traffic. The citywide and ongoing maintenance and renewals plans offer a massive untapped opportunity for radical mode shift through bold and steady change.

Also, separated cycling and walking don't damage road surfaces the way motor vehicles do thus reducing the renewals budget too.

Specifically, the "Level Of Service" concept needs to be replaced with clear goals for traffic reduction and improved Healthy Streets indicators.

In the city centre and other metropolitan centre, pedestrian priority at most intersections needs to be the norm.

Major and Minor Capex and Local Board Initiatives.

The focus should be on radical mode shift through bold change. Many Local Boards are sitting on overdue and well-informed plans that will help decrease emissions by improving active and public transport locally (including greenways plans).

The operations centre.

SCATS is totally focused on minimising impacts on the flow of the traffic network, this system needs a Vision Zero overhaul.

Leaving people on foot stranded, including children and elderly people, at malfunctioning traffic signals. SCATS tell us they could easily pivot to providing pedestrian priority (such as automatically providing crossing phases without the need for pressing a beg button), especially outside of peak hours – but are resolutely opposed to doing this. A fundamental culture change is required.

Here are the items that need to be eliminated:

Motorway widening, such as the Northern and Southern Corridor “Improvements”. The extra capacity these projects provide will induce traffic and emissions. If possible, the new lanes would be converted to bus priority lanes, but lane alignments might make that tricky. A complete ban on future motorway widening is required.

The solution to people driving from South Auckland to the North Shore to visit a friend is to put the infrastructure in place so that all the short journeys that are clogging up the road are done with other modes.

This applies whether the cars are electric or petrol.

The average car trip in Auckland is 5.5km, so half of all trips are less than this.

Capture a decent portion of these with alternative modes, and there are suddenly a lot less cars on the road.

Road Capacity Expansion

An immediate halt should be called on all projects that add road capacity, regardless of their stage, followed by a full re-assessment about whether the projects can be part of the programme required to deliver the Auckland Climate Plan. Even projects underway may need to be converted to cycle lanes or bus lane projects. Allowing contracts to continue that we know will increase emissions is unacceptable. Few of these projects will be compatible with the Auckland Climate Plan.

Mill Rd and Penlink - Their business cases are based on flawed planning, modelling and evaluation methods. These are traffic and VKT-inducing, and anti-climate change projects. Invest the billions in projects mentioned above instead.

Hatched Medians

This was a 1980's traffic flow engineering solution along with slip lanes that prioritised vehicle flow and amenity, safety and priority over other modes.

The painted median is space stolen from cyclists and prioritised PY in the 1980s for the convenience of cars. The introduction of the flush median was a factor in the decline of cycling from the mid-80s.

Unsafe practices

These include intersection widening. Building intersections with missing pedestrian legs or with slip lanes. Any arterial road streetscape designs without safe cycling and good walking infrastructure.

New Park and Ride Facilities

The evidence shows that these offer poor value for money, confirm and encourage car-dependent mindsets, and waste prime land at transport hubs that should be used for high density mixed-used development. New park and ride facilities are being built due to business-as-usual thinking at both Council and AT.

An Additional Waitemata Harbour Bridge (or tunnel) that does not focus on PT and active modes.

Any project that means the city has more traffic lanes across the harbour than we do currently should be dropped. Demand for traffic lanes across the harbour will drop remarkably if radical mode shift and the halt of sprawl are both achieved. Any modelling should wait until we've progressed these concepts. We refuse to accept additional lanes of traffic and increase VKTs into and around the city centre. Any additional crossing must absolutely prioritise public transport, walking and other active modes, and de-prioritise if not actively seek mode shift.

The city centre is at the pointy end of many of our transportation woes, the canary in the mine perhaps, though we do also have by far the best public transport options in all of Auckland. Emissions are not the only reason to reduce car use, car dominance, severance, lack of physical activity, road injuries, noise, inefficient use of space that is needed for community growing in high-density apartment environments.

Yes, we all want alternatives to cars. Yes, emissions are only one of the reasons. Which, EVs by the way will not fix in time either.

We expect fair consultation

Aucklanders deserve responsible transport planning without having to constantly be engaged in consultation and having to fight to overturn bad plans.

This particular plan has involved some disingenuous consultation in the online submission form where support for roading **and** public transport are lumped together in the same question. And the same for support of urban sprawl and urban density.

Finally

Auckland has failed at reducing emissions. We must boldly launch forward with low traffic neighbourhoods, cycling superhighways, road reallocation and a reduction in driving. We must innovate. We must turn our statistics around.

There is no negotiation between climate and the status quo, it's not a negotiation. Any transportation plan that does not reduce Auckland's emissions 64% by 2030 is a failure.

Essentially the challenges we face today have all been created by the causal and circular process of building roads for movement and immediately reducing movement with free parking. The costs of these decisions is immeasurable given how long it has been going on but it has to stop.

Equity is an essential requirement for the coming decade and beyond, and we currently have a far from equitable transport system. But we can't fix it by further entrenching the need to own and run a car, especially when also pushing people further and further from everyday amenities in pursuit of affordable (or any) housing. Once again, all those levers need to be pulled, at once.

Our transport organisations style themselves as delivery organisations and this is what is being required tight now to deliver something different. So, let's go.

It's definitely time – in fact we think it's already way past time. for bold vision, meaningful change, and systematic reorganisation. Tinkering around the edges won't do it.

We have to change things radically now. We did it briefly for Covid. We can certainly do it to save life as we know it on this planet.

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