

17 June 2024

Auckland Transport

[ATengagement@at.govt.nz](mailto:ATengagement@at.govt.nz)

### **Auckland Regional Land Transport Plan 2024-2034**

Thank you for the opportunity for the National Public Health Service – Northern Region, Health New Zealand –Te Whatu Ora to provide a submission on the Auckland Regional Land Transport Plan 2024-2034.

The National Public Health Service – Northern Region welcomes an opportunity to meet with you to discuss our submission.

The primary contact point for this submission is:

Megan Howson

Public Health Policy Advisor

National Public Health Service—Northern Region

09 623 4600

[mhowson@adhb.govt.nz](mailto:mhowson@adhb.govt.nz)

Ngā mihi,



**Jane McEntee**

**Group Manager, Strategy and Operations  
Northern Region  
National Public Health Service**



**Michael Hale**

**Public Health Medicine Specialist  
Northern Region  
National Public Health Service**

# 1. Overview

Thank you for the opportunity for National Public Health Service (NPHS) to submit on the Auckland Regional Land Transport Plan (RLTP) 2024-2034. The NPHS is a directorate within Health New Zealand – Te Whatu Ora (Health NZ). This submission has been written by NPHS – Northern Region, a regional arm of the directorate covering Tāmaki Makaurau/Auckland and Te Tai Tokerau/Northland. NPHS has a responsibility to promote and protect the health and wellbeing of our communities and achieve equity within the population.

Transport has a substantial effect on population health and wellbeing. Some of these causal factors are well-recognised, such as preventable deaths and injuries from road crashes, the impacts of noise pollution, and the ability of communities to access opportunities and services, including healthcare. There are also less visible factors, including the ways in which transport and urban design influence physical activity levels, climate change, social cohesion, and poor air quality<sup>1</sup>. Furthermore, these conditions are distributed unevenly across the population, often compounding existing social and health inequities<sup>2</sup>. A well-designed public and active transport system can mitigate the adverse impacts of transport, promote physical and mental wellbeing, and reduce inequities.

NPHS acknowledges the complexities confronted by Auckland Transport (AT) in consolidating national and regional transport priorities into a single cohesive plan in a way that will deliver meaningful change for the population of Tāmaki Makaurau/Auckland. NPHS commends AT for taking steps towards a multi-modal, healthier, safer, and more sustainable transport network through plans like the RLTP.

Overall, NPHS supports the vision and priorities contained in the RLTP, especially with regards to the goals to improve safety, reduce carbon emissions, and to improve the accessibility and efficiency of active and public transport options. The enclosed response provides detailed feedback on the RLTP in relation to its ability to improve health and wellbeing Tāmaki Makaurau/Auckland, especially for underserved groups. Specifically, this feedback relates to the RLTP's responsiveness to:

**(1) transport system transformation**, for which NPHS recommends;

- the inclusion of a regional objective specifically dedicated to improving health and wellbeing;
- that *Walking & Cycling*, and *Public Transport Improvements (and Services)* are given the highest priority amongst the funding activity classes;
- that the prioritisation rank for the *Cycleways programme (lower cost)* is higher;
- the introduction of targeted KPIs to measure transformation;
- that the 'building back better' approach to asset management is codified in policy;

---

<sup>1</sup> <https://www.ehinz.ac.nz/indicators/transport/about-transport-and-health/>

<sup>2</sup> Ministry of Transport. Equity in Auckland Transport System. 2020. Retrieved from: [https://www.transport.govt.nz/assets/Uploads/Report/NZ3060\\_Equity\\_in\\_Auckland\\_Transport\\_System.pdf](https://www.transport.govt.nz/assets/Uploads/Report/NZ3060_Equity_in_Auckland_Transport_System.pdf)

- that the wording of the regional objective '*Faster, more reliable public transport*' is amended.

**(2) improving Māori wellbeing**, for which NPHS recommends;

- the addition of a section that details the partnership approach taken to developing the programme, clarifies priorities for Māori, and demonstrates how these priorities were integrated in the identified challenges, regional objectives, and resultant investment programme.

**(3) achieving equitable outcomes**, for which NPHS recommends;

- the addition of a regional objective specifically focussed on addressing transport inequity in Tāmaki Makaurau/Auckland;
- inclusion of greater detail on the disproportionate impacts of each identified challenge on different population groups.

**(4) improving transport safety**, for which NPHS recommends;

- the prioritisation of projects that keep active transport users safe, via 1) the provision of infrastructure separated from motor vehicles, and; 2) reduced vehicle speeds;
- that the definition of safety is expanded to include interpersonal safety and security, and the importance of safe access for disabled people.

## 2. Response to Consultation

### 2.1 Transformational Change

It is well-accepted that transport system transformation is needed to tackle the pressing social, environmental, economic, and health issues facing the region and to promote population health through the provision of equitable, safe, affordable, and resilient mobility<sup>3</sup>. It is inarguable that the way to achieve this transformation is to move away from the legacy of a car-focussed transport system towards maximising the number of people using less carbon-intensive, less polluting and more efficient modes. NPHS strongly supports the delivery of an integrated and sustainable multi-modal transport network through investment that enacts previously agreed plans and strategies, including the Auckland Transport Alignment Project, TERP, Vision Zero, and Auckland Climate Plan<sup>2,4,5,6</sup>. To deliver this change, the RLTP must prioritise the provision of safe and accessible public and active transport services and infrastructure.

---

<sup>3</sup> United Nations. Sustainable transport, sustainable development. Interagency report for second Global Sustainable Transport Conference. 2021. Retrieved from: [https://sdgs.un.org/sites/default/files/2021-10/Transportation%20Report%202021\\_FullReport\\_Digital.pdf](https://sdgs.un.org/sites/default/files/2021-10/Transportation%20Report%202021_FullReport_Digital.pdf)

<sup>4</sup> Auckland Council (2021). *Auckland Council Alignment Project*. Retrieved from:

<https://www.transport.govt.nz/assets/Uploads/Report/ATAP20212031.pdf>

<sup>5</sup> Auckland Transport (2019). Vision Zero for Tāmaki Makaurau. Retrieved from: <https://at.govt.nz/media/1980910/vision-zero-for-tamaki-makaurau-compressed.pdf>

<sup>6</sup> Auckland Council (2020). *Auckland Climate Plan*. Retrieved from:

<https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-by-laws/our-plans-strategies/topic-based-plans-strategies/environmental-plans-strategies/aucklands-climate-plan/Documents/auckland-climate-plan.pdf>

## **Feedback and recommendations:**

- **NPHS recommends the inclusion of a regional objective specifically dedicated to improving health and wellbeing**, to anchor the plan in its fundamental purpose – to foster conditions for human and environmental thriving (which are intrinsically linked). This objective would support consistent prioritisation of projects that will deliver the greatest transformational change towards a safer, healthier transport system.
- **NPHS particularly supports the recognition in the RLTP of *Climate Change and Resilience* as one of the key challenges related to land transport in Tāmaki Makaurau/Auckland.** Significant and rapid change is needed in the transport system to achieve Tāmaki Makaurau/Auckland’s climate goals<sup>7,8</sup>. The environmental, societal, and human health costs of transport emissions are well-understood. This includes the direct health impacts of climate change, such as heat-sensitive diseases, changes in patterns of spread of vector-borne diseases, mental illness, undernutrition, respiratory and cardiovascular diseases, and the indirect impacts through changes in the social determinants of health<sup>9</sup>. In addition, the health impacts of air pollution caused by vehicle emissions are substantial. In 2016, over half of all Aucklanders (59.4%) were exposed to levels of nitrogen dioxide (NO<sub>2</sub>) higher than the current World Health Organization’s Air Quality Guidelines, with higher rates for Pacific Peoples (74.5%)<sup>10</sup>. These exposure levels were overwhelmingly from vehicle emissions. This is estimated to have caused 685 premature deaths and 3,504 respiratory and cardiovascular hospitalisations in Tāmaki Makaurau/Auckland, alongside 6,144 new cases of asthma among children. The annual social costs are \$3.2 billion from both the direct hospital costs and restricted activity days where people cannot work.<sup>8</sup>
- **NPHS supports the outcome associated with the challenge of ‘Asset Management’ of ‘building back better’ (Table 1, Page 11).** To maximise efforts towards generating transformational change, and do so in a cost-effective manner, it is beneficial to use maintenance and renewals of transport assets as opportunities for public and active transport upgrades (versus a replace like-for-like approach). **NPHS recommends this approach is codified in policy to ensure its realisation.**

---

<sup>7</sup> Auckland Council. Transport Emission Reductions Pathway. 2020. Retrieved from: <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/Pages/transport-emissions-reduction-pathway.aspx>

<sup>8</sup> Auckland Council. Auckland’s Climate Plan. 2020. Retrieved from: <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/topic-based-plans-strategies/environmental-plans-strategies/aucklands-climate-plan/Pages/default.aspx>

<sup>9</sup> Te Mana Ora, National Public Health Service. Climate Change and Health in Waitaha Canterbury. May 2023. Retrieved from: <https://www.cph.co.nz/wp-content/uploads/ClimateChangeHealthWaitahaCanterbury.pdf>

<sup>10</sup> Kuschel et al (2022). Health and air pollution in New Zealand 2016 (HAPINZ 3.0): Volume 1 – Finding and implications. (Report prepared by G Kuschel, J Metcalfe, S Sridhar, P Davy, K Hastings, K Mason, T Denne, J Berentson-Shaw, S Bell, S Hales, J Atkinson and A Woodward for Ministry for the Environment, Ministry of Health, Te Manatū Waka Ministry of Transport and Waka Kotahi NZ Transport Agency, March 2022). Ministry for the Environment

- **NPHS supports the inclusion of the regional objective ‘Faster, more reliable public transport’, however, recommends that the wording is amended.** NPHS are concerned that the word ‘fast’ can become confused with discourse around raising speeds on our roading network, which increases the risk of DSI, and in turn impacts reliability. Instead, NPHS recommends a focus on frequent, and ‘connected’ in place of ‘fast’ to reflect the pre-requisites of an efficient network.
- **NPHS aligns with transport users’ hierarchy approaches, and as such, recommends that *Walking & Cycling, and Public Transport Improvements (and Services)* are given the highest priority amongst the funding activity classes in the RLTP.** Transport users’ hierarchies support efficient, safe, equitable, and sustainable urban design by prioritising active transport first, then public transport, followed by business and freight, and finally the use of private vehicles for personal transport <sup>11</sup>. However, NPHS notes the interdependence of these transport classifications, and supports integrated approaches to investment in multi-modal transport infrastructure towards achieving transformational change. For example, NPHS supports projects to improve rapid transit network (RTN) access via the provision of connected active modes infrastructure. In addition, local road improvement projects should optimise safe and healthy public and active transport that shifts away from cars.
- **NPHS is strongly supportive of the *Cycleways programme (lower cost)* and recommends that its prioritisation rank is higher.** This will serve to increase active transport and help to connect users to efficient, reliable public transport networks such as rail. Both outcomes are known to have significant positive impacts on physical, spiritual and mental wellbeing. NPHS also notes that the delivery of a safe cycleway network does not only mean delivering an increased number of cycleways at pace, but the planning and provision of a connected network.
- **NPHS recommends the introduction of targeted KPIs to measure transformation.** Specifically, a KPI for mode shift from private vehicles to public and active transport, and a KPI for the reduction in vehicle kilometres travelled.

## 2.2 Māori wellbeing

Māori would greatly benefit from a transformational shift in Tāmaki Makaurau/Auckland’s transport system away from car dependency and towards better public and active transport options<sup>12,13</sup>. The provision of

---

<sup>11</sup> New Zealand College of Public Health Medicine (2018). *Transport Policy Statement*. Retrieved from: <https://nzcphm.org.nz/Policy-Statements/10944/>

<sup>12</sup> Randal, E.; Shaw, C.; McLeod, M.; Keall, M.; Woodward, A.; Mizdrak, A. The Impact of Transport on Population Health and Health Equity for Māori in Aotearoa New Zealand: A Prospective Burden of Disease Study. *Int. J. Environ. Res. Public Health* **2022**, *19*, 2032. <https://doi.org/10.3390/ijerph19042032>

<sup>13</sup> Raerino, K., Macmillan, A. K., & Jones, R. G. (2013). Indigenous Māori perspectives on urban transport patterns linked to health and wellbeing. *Health & Place*, *23*, 54-62. <https://doi.org/10.1016/j.healthplace.2013.04.007>

sustainable, affordable, safe, high-quality, and equitable transport options can improve Māori physical health, cultural and spiritual connectedness, and economic wellbeing, as well as reduce the inequitable burden of death and serious injuries on the roads<sup>14</sup>. Importantly, responding to the relationship between Māori wellbeing and the transport system goes further than discourses of inequity, and includes the importance of access to cultural and spiritual practices. By partnering with mana whenua to deliver an RLTP that uplifts Māori wellbeing, AT has an opportunity to give effect to regional strategic priorities, including the Auckland Plan 2050 and the AT Māori Responsiveness Plan (MRP), and demonstrate its commitment to Te Tiriti o Waitangi and He Whakaputanga.

## **Feedback and recommendations:**

- The RLTP would benefit from including detail about the ways in which the identified challenges and regional priorities relate to Māori outcomes and how these criteria were identified in partnership with Māori. Specifically;
  - *Section 2- Challenges* is currently lacking detail about how transport-related challenges impact Māori. These challenges must be identified in partnership with mana whenua, however, some examples of those previously identified at the national level include:
    - i. On average, Māori and Pacific People exist in larger multi-generational whānau groupings as compared to non-Māori and non-Pacific. This often presents compounding challenges related to public transport cost and the frequency and length of car trips required<sup>14</sup>.
    - ii. The current and intergenerational impacts of pepper-potting policies in Aotearoa/New Zealand has ongoing effects on the geographical density of whānau which often results in the need for Māori to travel greater distances<sup>15</sup>.
  - The prioritisation methodology detailed in Appendix 9 mentions: *“Consideration to key outcomes areas such as Māori Outcomes was also included in the process”*. NPHS agrees that Māori outcomes should be an essential criterion in the prioritisation of projects. However, the documented methodology is lacking in sufficient detail to understand how this consideration was applied in a meaningful way to development of a capital investment programme.

**NPHS recommends the addition of a section in the RLTP that details the partnership approach taken to developing the programme, clarifies priorities for Māori, and**

---

<sup>14</sup> Ministry of Transport. Equity in Auckland Transport System. 2020. Retrieved from: [https://www.transport.govt.nz/assets/Uploads/Report/NZ3060\\_Equity\\_in\\_Auckland\\_Transport\\_System.pdf](https://www.transport.govt.nz/assets/Uploads/Report/NZ3060_Equity_in_Auckland_Transport_System.pdf)

<sup>15</sup> Waka Kotahi NZ Transport Agency. A pathway towards understanding Māori aspirations for land transport in Aotearoa New Zealand. 2022. Retrieved from: <https://www.nzta.govt.nz/assets/resources/research/reports/688/688-a-pathway-towards-understanding-maori-aspirations-for-land-transport-in-new-zealand.pdf>



demonstrates how these priorities were integrated in the identified challenges, regional objectives, and resultant investment programme.

- NPHS supports the prioritisation of projects that aim to improve road safety for Māori, such as the *Marae and Papakainga (Turnouts) safety programme*.

## 2.3 Equitable outcomes

Transport is a strong determinant of health inequities related to physical activity, access to services, road injuries and deaths, social cohesion, cultural and spiritual connectedness, and exposure to environmental harms<sup>16,17</sup>. There are significant opportunities to improve transport equity in Tāmaki Makaurau/Auckland by improving access and safety for those experiencing higher levels of transport disadvantage and transport poverty, including Māori, Pacific Peoples, low-income groups, disabled people, the rainbow community, women, ethnic minority groups, and older people. By embedding considerations of equity as a central thread through all levels of transport planning, AT can demonstrate their commitment to Te Tiriti o Waitangi (specifically, Article 3 – Ōritetanga).

### **Feedback and recommendations:**

- NPHS agrees with the problem statement for ‘Access and connectivity’ on Page 11: “*Existing deficiencies in the transport system and an inability to keep pace with increasing travel demand is limiting improved and equitable access to employment and social opportunities*”. Whilst this problem statement frames the issue, transport inequity, and its flow-on effects on social, cultural, spiritual, economic, and health inequities is not addressed in any further detail in the RLTP.

**In recognition of the avoidable and unjust nature of inequities, and their relationship to transport, NPHS urges the RLTP to go further to address transport inequity. NPHS recommends the following amendments towards achieving this goal:**

- **Inclusion of greater detail in Section 2 – Challenges on the disproportionate impacts of each identified challenge on different population groups.** For example:
  - i. *Access and connectivity:* Māori, Pacific peoples, low-income groups, disabled people, women, the rainbow community, and older people experience inequitable access to safe transport options, which in turn generates barriers to accessing employment, social opportunities, cultural practices, spiritual practices and services<sup>18</sup>. Notably, transport is

---

<sup>16</sup> <https://www.ehinz.ac.nz/indicators/transport/about-transport-and-health/>

<sup>18</sup> Ministry of Transport. Equity in Auckland Transport System. 2020. Retrieved from: [https://www.transport.govt.nz/assets/Uploads/Report/NZ3060\\_Equity\\_in\\_Auckland\\_Transport\\_System.pdf](https://www.transport.govt.nz/assets/Uploads/Report/NZ3060_Equity_in_Auckland_Transport_System.pdf)

a key barrier to accessing healthcare services for many communities in Tāmaki Makaurau/Auckland, compounding health inequities<sup>19</sup>. As such, improvements to transport access should prioritise the needs of those currently experiencing the highest levels of transport disadvantage and transport poverty.

- ii. *Climate change and resilience*: The effects of climate change, including the impacts of extreme weather events, are not evenly distributed across society. Rather, climate change amplifies underlying structural inequalities and exacerbates existing economic, social and health inequities<sup>20</sup>. The urgent need to reduce climate emissions and provide resilient transport infrastructure is intrinsically linked to the government's responsibility to achieve an equitable Tāmaki Makaurau/Auckland.
- **The addition of a regional objective specifically focussed on addressing transport inequity in Tāmaki Makaurau/Auckland.** Application of this objective should result in the prioritisation of projects that will deliver the highest gain for underserved communities, such as by concentrating investment in areas of high deprivation.

## 2.4 Safety

Road safety is a shared responsibility which impacts the wellbeing of both individuals and communities. Unsafe or neglected roads can have significant impacts on the physical and mental wellbeing of the population and can also have far-reaching effects on the economy as well as reasonable access to health services. Since 2021, there has been a national increase in deaths caused by traffic accidents, with 374 deaths in 2022, 34 of which were pedestrian fatalities<sup>21</sup>. Furthermore, ACC typically receive over 10,000 road injury claims each year in Tāmaki Makaurau/Auckland alone<sup>22</sup>. These accidents often result in some sort of physical or emotional trauma, and are often responsible for absenteeism from work due to injury, carrying negative economic impacts.

Aotearoa/New Zealand has one of the highest rates of serious road trauma in the OECD; an issue that will persist unless significant investment is made into road safety. In addition to physical and mental health gains, improving road safety is likely to have positive environmental impacts by removing barriers to environmentally-friendly forms of travel, such as cycling. Sixty-seven percent of urban-based New Zealanders own a bike, but only 16% use their bike on a regular basis such as to commute. Safety is one of

---

<sup>19</sup> Ministry of Social Development. Prevalence and Consequences of Barriers to Primary Health Care. 2021. Retrieved from: <https://www.msd.govt.nz/documents/about-msd-and-our-work/publications-resources/research/barriers-to-primary-health-care/prevalence-and-consequences-of-barriers-to-primary-health-care.pdf>

<sup>20</sup> Royal Society Te Apārangi. Human Health Impacts of Climate Change for New Zealand. 2017. Retrieved from:

<https://www.royalsociety.org.nz/assets/documents/Report-Human-Health-Impacts-of-Climate-Change-for-New-Zealand-Oct-2017.pdf>

<sup>21</sup> <https://www.transport.govt.nz/statistics-and-insights/safety-annual-statistics>

<sup>22</sup> <https://www.acc.co.nz/newsroom/media-resources/road-injury-statistics/>



the main barriers to using bikes as a primary method of travel in Aotearoa/New Zealand<sup>23</sup>. By improving road safety, it will remove this barrier and facilitate healthy active transport which has been shown to have major positive impacts on physical and mental wellbeing.

In addition to road safety, NPHS also notes broader definitions of safety and its relationship to transport. Importantly, experiences and definitions of safety vary between different groups, and it is contingent on the transport system to account for this. For example, gender-diverse people and women report fears of using public transport and spending time in public places due to experiences of verbal and physical harassment<sup>24</sup>. As such, the design of public and active transport infrastructure should increase feelings of safety for women, gender-diverse individuals, ethnic minority groups, and other vulnerable-feeling users of the public realm, as well as enable disabled people and older people to move safely and independently.

### ***Feedback and recommendations:***

- **NPHS strongly supports the identification of safety as both a key challenge and regional objective in the RLTP.**
- **NPHS agrees that improved health and wellbeing is an outcome of a safer transport system (Table 1, Page 11) however, notes that this outcome traverses all objectives contained in the proposal, rather than just safety.** NPHS also notes that these health gains should be equitable.
- **NPHS recommends that the definition of safety in the RLTP is broadened to include interpersonal safety and security, and the importance of safe access for disabled people.**
- **Two prime inputs to safety for active transport users are: 1) the provision of infrastructure separated from motor vehicles, and; 2) reducing vehicle speeds.** These are both within the remit of Council and its agencies and **NPHS recommends that the RLTP gives priority to projects that create these conditions.**
- **NPHS supports the prioritisation of the *Road Safety Programme* and *Safe Speeds Programme*, as vital programmes for reducing the number of deaths and injuries on Tāmaki Makaurau/Auckland roads.** Specifically, the provision of permanent safe speeds around schools and educational settings must be a priority.

---

<sup>23</sup> Waka Kotahi. Understanding attitudes and perceptions of cycling & walking. 2022. Retrieved from: <https://www.nzta.govt.nz/assets/resources/understanding-attitudes-and-perceptions-of-cycling-and-walking/Waka-Kotahi-Attitudes-to-cycling-and-walking-final-report-2022.pdf>

<sup>24</sup>Ministry of Transport. Equity in Auckland Transport System. 2020. Retrieved from: [https://www.transport.govt.nz/assets/Uploads/Report/NZ3060\\_Equity\\_in\\_Auckland\\_Transport\\_System.pdf](https://www.transport.govt.nz/assets/Uploads/Report/NZ3060_Equity_in_Auckland_Transport_System.pdf)

- NPHS supports the proposed expansion of the rail network between Avondale and Southdown, but shares concerns expressed in the proposal that as the rail network expands, level crossings where rail lines intersect with roads become an increasing safety concern. As such, **NPHS supports the prioritisation of funds to make level-crossings safer.**

## Conclusion

Thank you for the opportunity to submit on the Regional Land Transport Plan 2024–2034. NPHS and AT share a commitment to improving wellbeing and transport equity for the population of Tāmaki Makaurau/Auckland. This submission highlights NPHS’s broad support for the vision contained within the RLTP, and provides recommendations to optimise the plan’s ability to contribute to transformational change, improve Māori outcomes, equitable outcomes, and transport safety. NPHS welcomes the opportunity to discuss any of the points raised in this submission.