

5 November 2021

Bevan Woodward  
fyi-request-16857-fba22874@requests.fyi.org.nz

REF: OIA-8834

Dear Bevan

**Request made under the Official Information Act 1982**

Thank you for your email of 23 September 2021 requesting the following information under the Official Information Act 1982 (the Act):

- 1. Please provide a copy of the material (eg: reports, analysis, minutes, resolutions and advice) that was relied on or pertains to NZTA's responses to the following information requests:*
- 2. Given the approach taken by the NZTA's Investment Prioritisation Method approach of rating for GPS alignment "based on the highest expected contribution to a single GPS strategic priority", how is NZTA ensuring the NLTP 2021-24 will meet the requirement of para 7 (and 51) of GPS 2021 that "a reduction in greenhouse gas emissions will be achieved through action across all priorities, programmes and activity classes"?*
- 3. Given the approach taken by the NZTA's Investment Prioritisation Method approach of rating for GPS alignment "based on the highest expected contribution to a single GPS strategic priority", how is NZTA ensuring the NLTP 2021-24 will meet the requirement of GPS 2021, para 113: "the focus of the investment in the activity classes is on improving safety, better travel options, improved freight connections, and climate change." Please provide three actual examples of how NZTA is meeting this requirement; one from State Highway Improvements activity class, one from Walking and Cycling Improvements activity class and one from Local Road Improvements activity class.*
- 4. How is NZTA ensuring the NLTP 2021-24 has met the requirement of GPS para 89 for each investment proposal that "Funding applicants need to show that they considered alternatives, and how they compare in meeting the results set out in Section 2.6. This includes considering whether there are better ways to operate and maintain the existing land transport system before considering new improvements."*
- 5. Please provide three actual examples of how NZTA is giving effect to para 89, one from State Highway Improvements activity class, one from Walking and Cycling Improvements activity class and one from Local Road Improvements activity class.*

6. *In preparing the NLTP 2021, please advise how NZTA has given effect to para 67 of GPS “Investment decisions will support the rapid transition to a low carbon transport system, and contribute to a resilient transport sector 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.”*
7. *Please advise NZTA’s understanding of the amount and timeframe of emissions reduction target the Climate Change Commission has recommended to Cabinet per para 67 of the GPS 2021.*
8. *Can NZTA confirm it will meet the emissions reduction target the Climate Change Commission has recommended to Cabinet (as required by para 67 of the GPS 2021)? Please provide details on NZTA’s predicted emissions compared to the Climate Change Commission recommended target.*
9. *How is induced traffic is accounted for in NZTA’s GHG emissions models?*
10. *Please provide the forecast emissions impacts for Penlink (Whangaparāoa) and the Otaki to north of Levin roading projects.*
11. *Please advise which investments in the NLTP 2021-24 activity classes of State Highway Improvements and Local Road Improvements are forecast to increase greenhouse gas emissions.*
12. *Please advise which investments in the NLTP 2021-24 activity classes of State Highway Improvements and Local Road Improvements that have not been assessed for greenhouse gas emissions.*
13. *How is NZTA ensuring that NLTP 2021-24 is “accelerating mode shift” as required by clause 145 of GPS 2021?*
14. *Please provide an update of dates and status of activities for NZTA’s “Keeping Cities Moving” Attachment 1: “Timeline for the National Tactical Plan” published September 2019.*
15. *Please advise NZTA’s predictions for mode share for the years 2021 – 2031, as compared to a baseline of 2020.*
16. *How is NZTA having “a greater role in long-term, integrated planning for the sector” as required by para 146 of GPS-LT 2021?*
17. *Please provide evidence of the work done by NZTA to “work closely with MoT and local government in developing and implementing the NLTP to give effect to the GPS” as required by para 147 of the GPS 2021.*
18. *Does an updated version of Toitū te Taiao (originally published April 2020) exist? If so, please provide a copy, or advise whether a date has been set for an update.*

In developing the 2021–24 National Land Transport Programme (NLTP) Waka Kotahi NZ Transport Agency must give effect to the Government Policy Statement on Land Transport 2021. On the Waka Kotahi website, you can find further details of GPS implications for Waka Kotahi and approved organisations, including guidance on how the GPS will be applied in the National Land Transport Fund (NLTF) and NLTP.

I will answer each of your questions in turn.

**1. Please provide a copy of the material (eg: reports, analysis, minutes, resolutions and advice) that was relied on or pertains to NZTA's responses to the following information requests:**

Relevant material is attached and noted in response to each question in this letter below. In addition, Waka Kotahi is currently preparing a proactive release of papers relating to the development and confirmation of the NLTP 2021-24 on our website and will provide you with a link to our proactive releases page when the information becomes available.

**Questions 2, 3, 4, 5, 6 and 13**

We have responded to questions 2, 3, 4, 5, 6 and 13 together. In our view, these questions are in the nature of requests for explanations rather than existing information held by Waka Kotahi. We note that we are not required to create new information to respond to requests for explanations. Accordingly, we respond to your requests to the extent that they apply to information already held by Waka Kotahi.

Analysis of how the NLTP 2021-24 gives effect to the GPS is contained in the NLTP and in Waka Kotahi Board papers dated 19 and 31 August 2021.

The NLTP is a publicly available document found here: [www.nzta.govt.nz/planning-and-investment/national-land-transport-programme/2021-24-nltp/](http://www.nzta.govt.nz/planning-and-investment/national-land-transport-programme/2021-24-nltp/). Waka Kotahi is currently preparing a proactive release of papers relating to the development and confirmation of the NLTP 2021-24 on our website. Therefore, I am refusing this part of your request under section 18(d) of the Act. We will provide you with a link to our proactive releases page when the information becomes available, which should be on or before 1 December 2021.

**7. Please advise NZTA's understanding of the amount and timeframe of emissions reduction target the Climate Change Commission has recommended to Cabinet per para 67 of the GPS 2021.**

We decline this request as, in our view, it is a request for an opinion and not a request for information under the Act.

**8. Can NZTA confirm it will meet the emissions reduction target the Climate Change Commission has recommended to Cabinet (as required by para 67 of the GPS 2021)? Please provide details on NZTA's predicted emissions compared to the Climate Change Commission recommended target.**

We decline the first part of this request for us to confirm we will meet the emissions reduction target the Climate Change Commission has recommended to Cabinet as, in our view, it is not a request for information under the Act.

The second part of this request relating to predicted emissions compared to the Climate Change Commission recommended target, is for information not held by Waka Kotahi. Therefore, I am refusing your request under section 18(e) on the basis the documents alleged to contain the information do not exist.

## **9. How is induced traffic is accounted for in NZTA's GHG emissions models?**

The Waka Kotahi investment decision making framework requires potential induced traffic impacts that may arise from proposed improvements to the transport system to be assessed in accordance with the Waka Kotahi Monetised Benefits and Costs Manual (MBCM):

[www.nzta.govt.nz/assets/resources/monetised-benefits-and-costs-manual/Monetised-benefits-and-costs-manual.pdf](http://www.nzta.govt.nz/assets/resources/monetised-benefits-and-costs-manual/Monetised-benefits-and-costs-manual.pdf).

Transport Model Development guidelines provide an industry standard for estimating induced traffic: [www.nzta.govt.nz/assets/resources/transport-model-development-guidelines/docs/tmd.pdf](http://www.nzta.govt.nz/assets/resources/transport-model-development-guidelines/docs/tmd.pdf).

To assess the specific greenhouse gas emission impact of induced traffic, Waka Kotahi takes traffic data outputs from relevant regional or project-specific transport models and applies emission factors to these that are taken from the Waka Kotahi Vehicle Emission Prediction Model ([www.nzta.govt.nz/roads-and-rail/highways-information-portal/technical-disciplines/air-quality-climate/planning-and-assessment/vehicle-emissions-prediction-model/](http://www.nzta.govt.nz/roads-and-rail/highways-information-portal/technical-disciplines/air-quality-climate/planning-and-assessment/vehicle-emissions-prediction-model/)), which is aligned to the Ministry of Transport Vehicle Fleet Emission Model. Waka Kotahi is currently developing guidelines to formalise and support a consistent approach being taken to the assessment of greenhouse gas emission impacts from proposed land transport infrastructure improvements, including consideration of induced traffic as and where appropriate.

Therefore, I am refusing your request under section 18(d) as the information requested is publicly available.

## **10. Please provide the forecast emissions impacts for Penlink (Whangaparāoa) and the Otaki to north of Levin roading projects.**

As per our response to you on 1 October 2021 to OIA-8752, Waka Kotahi is working with the Ministry of Transport and Ministry for the Environment on a proactive release of the CIPAs and related documents for publishing, and Waka Kotahi will contact you when these have been published, which should be before or on 1 December 2021. Therefore, I am refusing your request under section 18(d) as the information requested will soon be publicly available.

## **11. Please advise which investments in the NLTP 2021-24 activity classes of State Highway Improvements and Local Road Improvements are forecast to increase greenhouse gas emissions.**

An assessment of the NLTP was undertaken using the Waka Kotahi Climate Assessment Tool for Investment (CATI). This was completed on 30 August 2021. CATI is a new tool and remains in development. It's application, therefore, comes with some important caveats. In particular, CATI provides:

- a qualitative not quantitative profile of an investment programme in terms of its potential to increase or reduce emissions
- in the case of the NLTP, a three-year snapshot focused on the potential of investment to increase or reduce enabled emissions (i.e. vehicle use) not construction or operating emissions

- an assessment of activities included in the NLTP across three categories:
  - potential to increase emissions (e.g. increasing road capacity for vehicles)
  - potential to maintain emissions (e.g. operations, maintenance, and business cases)
  - potential to reduce emissions (e.g. public transport and active modes)

Attachment - Q11 - list of investments is a list of activities included in the NLTP State Highway Improvements and Local Road Improvements activity classes that were assessed as having the potential to increase emissions.

It is worth noting that due to the high-level nature of the CATI assessment, some projects with initial phases categorised as “potential to increase emissions” may be precursors to investments that have the potential to reduce emissions in the long-term. Similarly, such projects may also contain project elements that have the potential to decrease emissions (e.g. the provision of a walking and cycling path in conjunction with a state highway roading project).

**12. Please advise which investments in the NLTP 2021-24 activity classes of State Highway Improvements and Local Road Improvements that have not been assessed for greenhouse gas emissions.**

As per our response to you on 4 October 2021 to OIA-8764, the CATI assessment noted above covered all activities included in the NLTP.

**14. Please provide an update of dates and status of activities for NZTA’s “Keeping Cities Moving” Attachment 1: “Timeline for the National Tactical Plan” published September 2019.**

See Attachment – Q14 – Mode Shift National Action Plan Tracking Sept 21 for information within scope of this request. Certain information has been removed as it is not in scope of your request.

**15. Please advise NZTA’s predictions for mode share for the years 2021 – 2031, as compared to a baseline of 2020.**

There are no documents Waka Kotahi holds in response to this request. Therefore, I am refusing this request under section 18(e) as the document alleged to contain the information requested does not exist.

You may wish to contact the Climate Change Commission or the Ministry of Transport who have undertaken work to predict future mode share.

**16. How is NZTA having “a greater role in long-term, integrated planning for the sector” as required by para 146 of GPS-LT 2021?**

Refer to pages 22-24 of the NLTP setting out our role as system leader and in system planning, spatial planning and urban design, found here: [www.nzta.govt.nz/planning-and-investment/national-land-transport-programme/2021-24-nltp/](http://www.nzta.govt.nz/planning-and-investment/national-land-transport-programme/2021-24-nltp/).

Refer also to *Arataki*, our 10-year view and long-term objectives for the land transport system, found here: [www.nzta.govt.nz/planning-and-investment/planning/arataki/arataki-version-2/](http://www.nzta.govt.nz/planning-and-investment/planning/arataki/arataki-version-2/).

In regard to the work Waka Kotahi intends to carry out this year towards this objective, refer to the 2021-22 Statement of Performance Expectations: [www.nzta.govt.nz/assets/resources/statement-of-performance-expectations/2021-2022/spe-2021-2022.pdf](http://www.nzta.govt.nz/assets/resources/statement-of-performance-expectations/2021-2022/spe-2021-2022.pdf). In particular, refer to the section “Partnering on integrated transport system and spatial planning” on page 50.

As this information is publicly available, I am declining your request under section 18(d).

**17. Please provide evidence of the work done by NZTA to “work closely with MoT and local government in developing and implementing the NLTP to give effect to the GPS” as required by para 147 of the GPS 2021.**

Thank you for clarifying this part of your request for us on 26 October 2021, as below:

*Regarding clarification of question 17:*

*Particular topics of interest: The development and implementation of NZTA's process for assessing investments for inclusion in NLTP 2021 to give effect to GPS 2021.*

*Category of documents of interest: Guidance materials issued by NZTA to local Government. NZTA's dialogue with MoT and the Climate Change Commission.*

*Date range for the information: 1 November 2020 - 6 September 2021.*

The following documents fall within the scope of this request and are enclosed:

- Attachment Q17a - 002 - NLTP Moderation Approved Organisation Overview and Milestones.pdf
- Attachment Q17b - 002 - NLTP Moderation Waka Kotahi Overview and Milestones.pdf
- Attachment Q17c - Approach to the Final Moderation for Improvement Activities.pdf
- Attachment Q17d - Preparation for the Assessment Prioritisation Workshop.pdf

The guidance materials Waka Kotahi provided regarding the application of the Investment Prioritisation Method can be found on our website here: [www.nzta.govt.nz/planning-and-investment/planning/investment-decision-making-framework-review/investment-prioritisation-method/](http://www.nzta.govt.nz/planning-and-investment/planning/investment-decision-making-framework-review/investment-prioritisation-method/).

There were also “NLTP Bulletins” provided by Waka Kotahi to local government from September 2019 to October 2021 and can be found on our website here: [www.nzta.govt.nz/planning-and-investment/national-land-transport-programme/news-updates?start=0](http://www.nzta.govt.nz/planning-and-investment/national-land-transport-programme/news-updates?start=0).

Regarding the part of this request for dialogue between Waka Kotahi and the Ministry of Transport and the Climate Change Commission. I can confirm that there are some emails between Waka Kotahi and the Ministry of Transport that are in scope, and we are working towards providing this information to you before or on 26 November 2021. This is because of the consultations necessary to make a decision on the request are such that a proper response to the request cannot reasonably be made within the original time limit.

**18. Does an updated version of Toitū te Taiao (originally published April 2020) exist? If so, please provide a copy, or advise whether a date has been set for an update.**

Toitū te Taiao has not been updated since it was originally published in April 2020. The latest version can be accessed via the following link: [www.nzta.govt.nz/assets/About-us/docs/sustainability-action-](http://www.nzta.govt.nz/assets/About-us/docs/sustainability-action-)

plan-april-2020.pdf. As this information is publicly available, I am declining your request under section 18(d).

With respect to the information that has been withheld, I do not consider there are any other factors which would render it desirable, in the public interest, to make the information available.

Under section 28 of the Act, you have the right to ask the Ombudsman to review my decision to withhold this information and refuse parts of your request. The contact details for the Ombudsman can be located at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

If you would like to discuss this reply with the Waka Kotahi NZ Transport Agency, please contact Ministerial Services by email to [official.correspondence@nzta.govt.nz](mailto:official.correspondence@nzta.govt.nz).

Yours sincerely

A handwritten signature in black ink, appearing to read 'H. Cattermole', written in a cursive style.

**Howard Cattermole**  
Chief Financial Officer

### OIA-8834 Document Schedule

| Ref | Document  | Date              | Description   |
|-----|---|-------------------|---|
| 1.  | Attachment – Q11 – list of investments.xlsx   | N/A               | Release in full.  |
| 2.  | Attachment - Q14 -<br>Mode_Shift_National_Action_Plan_Tracking_Sept_21.pdf                | September<br>2021 | Certain information being withheld as being out of scope. |
| 3.  | Attachment Q17a - 002 - NLTP Moderation Approved Organisation Overview and Milestones.pdf | N/A               | Release in full.  |
| 4.  | Attachment Q17b - 002 - NLTP Moderation Waka Kotahi Overview and Milestones.pdf           | N/A               | Release in full.  |
| 5.  | Attachment Q17c - Approach to the Final Moderation for Improvement Activities.pdf         | 17 May<br>2021    | Release in full.  |
| 6.  | Attachment Q17d - Preparation for the Assessment Prioritisation Workshop.pdf              | N/A               | Release in full.  |