

IN THE HIGH COURT OF NEW ZEALAND  
AUCKLAND REGISTRY

CIV-2021-404-1618

I TE KŌTI MATUA O AOTEAROA  
TĀMAKI MAKĀURAU ROHE

UNDER the Judicial Review Procedure Act 2016

IN THE MATTER OF an application for judicial review

BETWEEN **ALL ABOARD AOTEAROA  
INCORPORATED**  
Applicant

AND **AUCKLAND TRANSPORT**  
First respondent

AND **THE REGIONAL TRANSPORT  
COMMITTEE FOR AUCKLAND**  
Second respondent

Cont.

---

**AFFIDAVIT OF CHUN YEUNG (ALEC) TANG IN REPLY**

23 March 2022

---

Assigned judicial officer:

Next event date: Hearing on 26-28 April 2022

---

**JACK CUNDY BARRISTER & SOLICITOR**

Counsel  
Davey Salmon QC  
Mills Lane Chambers  
davey.salmon@millslane.co.nz  
+ 64 9 977 7902

Solicitor  
Jack Cundy  
PO Box 1077 Shortland Street, Auckland 1140  
jack@jackcundy.co.nz  
+64 972 93130

201.0244

AND

AUCKLAND COUNCIL

Third respondent

**AFFIDAVIT OF CHUN YEUNG (ALEC) TANG IN REPLY**

---

I, Chun Yeung (Alec) Tang, Chartered Environmentalist, swear –

1. I make this affidavit on behalf of the applicant, All Aboard Aotearoa Incorporated, in reply to the affidavits filed on behalf of the respondents.

**Qualifications and experience**

2. I am a Chartered Environmentalist through the Society for the Environment and a Fellow of the Institute of Environmental Management and Assessment.
3. I have a Bachelor of Science with Honours in Natural Sciences from the University of Bath and a Master of Science with Honours in Environmental Science from the University of Auckland.
4. I have over 20 years' experience as an environmental and sustainability professional, supporting private organisations and local and central government in addressing critical sustainability issues such as climate change and water risks.
5. From June 2016 through to April 2021 I worked in the Chief Sustainability Office at Auckland Council, initially as the Principal Specialist for Corporate Sustainability and later as the Chief Sustainability Officer (Acting).
6. I was the Chief Sustainability Officer (Acting) through the finalisation of Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan (**Te Tāruke-ā-Tāwhiri**).
7. I am currently the Director Sustainability at Kāinga Ora and a Lecturer on Sustainable Business at AUT University. I do not make this affidavit in either of those capacities, or on behalf of either organisation.
8. Rather, this affidavit responds to the affidavits filed on behalf of the respondents. In doing so it, draws on my personal and professional insights into the nature of climate action and the organisational, process and procedural shifts required to meet our moral, organisational and societal commitments to climate action. These insights are based on my extensive work in this area, including my experience in the Chief Sustainability Office at Auckland Council, and my work on Te Tāruke-ā-Tāwhiri.

**Code of conduct for expert witnesses**

9. As noted, my affidavit addresses matters that are within my knowledge because of my role in the Chief Sustainability Office. I also give opinion evidence on matters that are within my area of expertise. I confirm that I have read and complied with the Code of Conduct for Expert Witnesses in preparing my affidavit.
10. A copy of my CV is annexed to this affidavit.

**Involvement with the RLTP**

11. I note at the outset that I held the position of Chief Sustainability Officer (Acting) at Auckland Council at the time that the Regional Land Transport Plan (RLTP) was being developed by Auckland Transport. I left Auckland Council on 28 April 2021, before the RLTP was adopted.
12. I was not involved in the development of the RLTP. Nor was I asked to provide formal advice in respect of the RLTP, including whether it was consistent with the Auckland Council's climate commitments under Te Tāruke-ā-Tāwhiri.
13. Nevertheless, I was aware through my role that the RLTP was being developed. I am also aware that, as recorded in the RLTP itself:
- (a) Emissions are expected to increase by 6% between 2016 and 2031, but to decrease by 1% when the impact of certain central government initiatives (a "Clean Car" policy and a shift to biofuels) are taken into account.
  - (b) Vehicle Kilometres Travelled (VKT) are expected to increase by 22% between 2016 and 2031.

14. Those modelled emissions outcomes are inconsistent with the decarbonisation pathway that had been set out in Te Tāruke-ā-Tāwhiri, which models a 64% reduction in transport emissions between 2016 and 2030 (page 52 of Te Tāruke-ā-Tāwhiri). The modelled 22% increase in VKT is also inconsistent with Te Tāruke-ā-Tāwhiri's target of reducing VKT by 12% by 2030 (page 47 of Te Tāruke-ā-Tāwhiri). [[301.0241]]

15. I address Te Tāruke-ā-Tāwhiri and the targets it set for Tāmaki Makaurau in more detail below. [[301.0236]]

**Te Tāruke-ā-Tāwhiri and the imperative for urgent, bold and ambitious climate action**

16. The climate challenge for Tāmaki Makaurau is addressed in section 4 of the affidavit of the Auckland Council's Chief of Strategy, Megan Tyler. At paragraphs 4.28 to 4.45 Ms Tyler gives evidence about the overarching goals and intentions for Te Tāruke-ā-Tāwhiri. [[201.0433]]

17. Although I do not disagree with Ms Tyler's summary of Te Tāruke-ā-Tāwhiri, I wish to highlight the following points:

- (a) Te Tāruke-ā-Tāwhiri was developed after Auckland Council successfully reapplied for membership to the C40 Cities Climate Leadership Group, which included a requirement to develop a climate plan consistent with the Paris Agreement aspiration to hold global temperature rises to 1.5°C (page 16 of Te Tāruke-ā-Tāwhiri). [[301.0205]]

- (b) It is important to reiterate that within Te Tāruke-ā-Tāwhiri there is specific acknowledgment that "Reducing GHG emissions by 50 per cent by 2030 is not plausible, unless bold and ambitious climate action is taken" (page 49). [[301.0238]]

- (c) Te Tāruke-ā-Tāwhiri also acknowledges that the region’s current, business-as-usual emissions pathway is not aligned with the region’s goal of net zero emissions by 2050 (page 41), let alone the more ambitious and more immediate target of halving emissions by 2030 required for compliance with a 1.5°C-aligned decarbonisation pathway. [301.0230]
- (d) Moreover, Te Tāruke-ā-Tāwhiri acknowledges that “continuing on our current pathway, we are likely to exceed our carbon budget by around 2030” (page 53). The region’s carbon budget is the “total cumulative greenhouse gas emissions that Auckland can produce to play its part in keeping global emissions within the 1.5°C temperature rise threshold” (page 50). [301.0242]  
[301.0239]
- (e) As Ms Tyler notes at paragraph 4.30, Te Tāruke-ā-Tāwhiri says that “to achieve our climate commitments, we need bold, ambitious climate action across every sector” (page 43 of Te Tāruke-ā-Tāwhiri). [201.0434]  
[301.0232]  
However, the plan goes further to acknowledge that “[d]elivering a decarbonisation pathway in line with the modelled pathway will require **transformative and committed action** across sectors and by a range of diverse stakeholders including Auckland Council, central government, businesses, and individuals” [emphasis added] (page 49). [301.0238]
18. This imperative for a transformative approach to meeting the region’s climate commitments, rather than a business-as-usual approach with some carbon reductions, was a key focus for the Chief Sustainability Office during my tenure. I addressed these issues in an article published in Auckland Council’s OurAuckland Magazine on 16 December 2020.<sup>1</sup> As I noted in the piece: “whilst commitments and targets show ambition, it’s the change on the ground that is most interesting and exciting, a change that ignites the possibility of transformation even in the face of significant status quo-ism”.
- The decarbonisation pathway for Tāmaki Makaurau and the role of transport**
19. Ms Tyler’s evidence sets out the purpose of the modelled decarbonisation pathway that underpins Te Tāruke-ā-Tāwhiri, noting that “the purpose of Te Tāruke-ā-Tāwhiri is not to identify, and then prioritize, particular projects or investments” (paragraph 4.35). Ms Tyler also notes: “Not all sectors were modelled to deliver the same level of emissions reductions. This was intentional to reflect the different challenges and opportunities facing each sector” (paragraph 4.36). [201.0435]
20. This is a critical point that highlights two key considerations for the modelled pathway, actions and targets.
21. Firstly, the targets and actions set out within the modelled pathway need to be considered as a holistic and interconnected set. To achieve the region’s emissions reduction commitments through this modelled pathway, all targets

<sup>1</sup> <https://ourauckland.aucklandcouncil.govt.nz/news/2020/12/le-pariversaire-a-turning-point-for-tamaki-makaurau/>.

across all sectors need to be achieved. Any attempts to downscale the emissions reduction ambition in one sector will require an equivalent increase in ambition in other sectors for Te Tāruke-ā-Tāwhiri to remain a 1.5°C compliant climate action plan endorsed by the C40 Cities Climate Leadership Group.

22. It is important to recognise that the scale and pace for change and climate action in Auckland is set by Te Tāruke-ā-Tāwhiri. It cannot and should not be set by any subsequent policies, plans or programmes established to deliver on the climate commitments. Any attempt to do so would require a wholesale review of the proposed decarbonisation pathway across all sectors.
23. In this respect, I disagree with the suggestion by the Chair of the Board of Auckland Transport, Adrienne Young-Cooper, that Auckland Council's Transport Emissions Reduction Plan (TERP), which I understand is currently under development, will set the scale and pace of change for the transport sector in Auckland (paragraph 26(g)). As Ms Tyler notes (paragraph 4.51), "the TERP will deliver a recommended decarbonisation pathway to meet the modelled 64 percent reduction in transport sector emissions by 2030 (against 2016 levels) set out in Te Tāruke-ā-Tāwhiri". [201.0414]  
[201.0439]
24. To reiterate, the scale and pace of change for Auckland's transport emissions have already been determined by Te Tāruke-ā-Tāwhiri, in compliance with Auckland's obligations as a member of the C40 Cities Climate Leadership Group.
25. Secondly, the modelled pathway for reducing Auckland's emissions has taken into consideration the currently available technologies and possible interventions across the key sectors identified within the region's greenhouse gas emission profile – transport; stationary energy; waste; industrial processes and product use; and agriculture forest and land use (pages 41-43 of Te Tāruke-ā-Tāwhiri). [301.0230]
26. The heavy focus on the transport sector (with a modelled 64% reduction) in order to achieve a halving of regional greenhouse gas emissions by 2030 stems from the ease of achieving these reductions compared to other sectors. There are many available interventions to reduce our transport emissions – for example, provision of infrastructure for walking and cycling; provision of public transport services and infrastructure; road pricing; and incentives for electric vehicles. However, there are fewer viable interventions in other sectors such as agriculture and industrial processes.
27. Pages 142-145 of Te Tāruke-ā-Tāwhiri set out the actions for reducing transport emissions; which agencies have control of those actions; and a series of associated targets for the transport sector. [301.0331]

#### **How the decarbonisation pathway was modelled**

28. At paragraphs 93-128 of his affidavit, Auckland Transport's Group Manager, Policy, Planning and Investment, Hamish Bunn, addresses the modelling undertaken for Te Tāruke-ā-Tāwhiri and the modelling used to inform the RLTP. [201.0292]

29. As recorded in Te Tāruke-ā-Tāwhiri (page 51), the decarbonisation pathway was modelled using the CURB model, with “additional bespoke modelling”. [301.0240]
30. The CURB model is the model recommended by the C40 Cities Climate Leadership Group to underpin 1.5°C compliant plans.<sup>2</sup> CURB takes a ‘top-down’ view of emissions reduction. This means that rather than starting with the status quo and ‘building up’ possible emissions savings, the model starts with the ultimate goal of halving emissions across the whole emissions profile by 2030 and asks ‘what needs to be true’ in order to achieve this.
31. As Mr Bunn notes (paragraph 118), the CURB model is not a transport model. This reflects the need to take a holistic view of emissions reduction across a number of different sectors. The CURB model’s ‘top-down’ approach is critical given the need to take a transformative approach to climate action outlined above. [201.0299]
32. It is also necessary because the current transport model used to inform Auckland Transport’s investment decisions, the Macro Strategic Model (MSM), is incapable of delivering the emissions reduction targets that have been set for the region (as Mr Bunn addresses at paragraphs 102-109 of his affidavit). [201.0294]
33. Much like the setting of financial budgets, if you are seeking a significantly different outcome from a constrained set of resources (whether this is carbon, finance or anything else), then loading your budget from the outset with pre-existing assumptions and commitments made with an alternative outcome in mind will clearly impact on your ability to achieve transformational change.
34. As Mr Bunn notes (paragraph 93), modelling undertaken by Auckland Transport using MSM was used to inform the wider decarbonisation modelling undertaken for Te Tāruke-ā-Tāwhiri. This formed part of the additional “bespoke modelling” referred to in Te Tāruke-ā-Tāwhiri (page 51), alongside several other tools. The use of a broad set of modelling tools, rather than reliance on Auckland Transport’s modelling alone, stemmed from the recognition of several limitations with MSM as it pertains to estimating both transport emissions reduction specifically and emissions reduction more broadly. [201.0292] [301.0240]
35. I have read the draft affidavit of Neelima Ghanta on behalf of the respondents, which describes the limitations of the MSM. I agree with Ms Ghanta’s evidence on these issues, and it is consistent with my understanding.

#### **The imperative for systemic and structural change**

36. At paragraph 4.52 of her affidavit Ms Tyler says: [201.0439]
- To meet the modelled reduction in transport sector emissions, transformational change will be required in how people and goods move around Auckland. Local and central government will also need to transform its business-as-usual planning and investment processes. Planned transport investments and current policy settings are

---

<sup>2</sup> <https://resourcecentre.c40.org/resources/setting-ghg-emissions-reduction-targets>.

insufficient to meet the scale of transport emissions reductions modelled in Te Tāruke-ā-Tāwhiri.

37. I wholeheartedly support the statement. Tāmaki Makaurau will not achieve the emissions targets and climate commitments set out within Te Tāruke-ā-Tāwhiri – or the broader national and global climate targets – without revisiting its existing systems and structures.
38. This need for systemic transformation is widely recognised by a whole range of groups, including:
- (a) The Intergovernmental Panel on Climate Change: “Limiting warming to 1.5°C above pre-industrial levels would require transformative systemic change, integrated with sustainable development”;<sup>3</sup>
  - (b) The World Business Council for Sustainable Development: “A safe, sustainable and prosperous future depends on systems transformations that will require enormous, determined and enduring effort from all corners of society, including business... reinvention means recognising that our current system of capitalism is producing outcomes that are unsustainable”;<sup>4</sup> and
  - (c) The World Resources Institute: “Achieving these deep emissions reductions [halving global greenhouse gas emissions by 2030 and reaching net zero CO<sub>2</sub> by mid-century] will require rapid, far-reaching transitions of unprecedented scale across nearly all major sectors”.<sup>5</sup>
39. This need for systemic change and the recalibration of business-as-usual is also highlighted in Ngā Ara Whakaahua Matua: Transformational priority pathways for Tāmaki Makaurau (pages 33-34 of Te Tāruke-ā-Tāwhiri), which were a key input to Te Tāruke-ā-Tāwhiri provided by mana whenua. The transformational priority pathways form one part of mana whenua’s response Te Tāruke-ā-Tāwhiri, Te Ora o Tāmaki Makaurau – the wellbeing of Tamaki Makaurau (pages 31-32 of Te Tāruke-ā-Tāwhiri). [301.0222]
40. It is worth noting that this input from mana whenua forms part of the third overarching pillar of Te Tāruke-ā-Tāwhiri – “A Tāmaki Makaurau response”. The other two pillars are “reducing our emissions” and “adapting to climate change”. “A Tāmaki Makaurau response” acknowledges that the region’s climate response “must reflect our values and principles as Aucklanders and be appropriate for Tāmaki Makaurau/Auckland” (page 7 of Te Tāruke-ā-Tāwhiri). Through discussions with elected members during the finalisation of Te Tāruke-ā-Tāwhiri, it was made clear that this pillar was to be considered as equally important to the goals, principles and targets set out in the other two pillars of the plan. [301.0196]

---

<sup>3</sup>

[https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15\\_Chapter4\\_Low\\_Res.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_Chapter4_Low_Res.pdf).

<sup>4</sup> <https://www.wbcsd.org/Overview/About-us/Vision-2050-Time-to-Transform/Resources/Time-to-Transform>.

<sup>5</sup> <https://www.wri.org/research/state-climate-action-2021>.



**The need to reconsider existing investment decisions and policy directions**

41. At paragraph 4.50 of her evidence, Ms Tyler says that “to achieve the ambitious goals in Te Tāruke-a-Tāwhiri, Auckland cannot rely on a business-as-usual approach or traditional planning, strategy and funding tool.” This is a critical and important consideration. However, later in her evidence (paragraph 5.17), in reference to the Planning Committee’s endorsement of the RLTP, Ms Tyler says that a “large portion of the programme that was already committed or essential”.
42. Similarly, in several parts of his evidence Mr Bunn refers to projects and investments that he says were ‘committed’ and ‘essential’ (e.g. paragraphs 56-57, 147 and 151). He also says that a “key consideration was preserving the core of the AT programme initiated as a result of the 2018 RLTP” (paragraph 41(b)). Ms Young-Cooper notes that the RLTP was “not the first RLTP, but rather latest RLTP – which means it “carries forward” many long term capital investments and operational costs for the transport system made under previous RLTPs...” (paragraph 15).
43. In considering the systemic and structural changes required to meet our climate commitments, it is essential to reconsider existing investment decisions and policy directions. Many of those investment decisions and policy directions will have been made or adopted prior to the adoption of more ambitious climate commitments by the region and the country, and some of them will make achieving our climate targets more difficult and/or lock the region into high-carbon pathways.
44. This issue of reviewing historical commitments is one that I raised during my term in the Chief Sustainability Office in a number of contexts. Of particular relevance to this evidence is the input that my team and I provided to the 2021-2031 10 Year Budget/Long Term Plan (2021-2031 LTP) that was developed at the same time as the RLTP.
45. As part of the 2021-2031 LTP, a specific climate-related package of investments was developed and proposed. On 23 September 2020 a Finance and Performance Committee workshop was held with Auckland Council elected members (councillors and local board members) to discuss the contents of this package and the funding options.<sup>6</sup> The funding options presented including the options of reprioritising existing spending and stopping planned activities.

---

<sup>6</sup> Materials and minutes from this workshop are available here: [https://infocouncil.aucklandcouncil.govt.nz/Open/2021/06/FIN\\_20210617\\_ATT\\_9563\\_EXCLUDED.htm#PDF3\\_Attachment\\_80484\\_4](https://infocouncil.aucklandcouncil.govt.nz/Open/2021/06/FIN_20210617_ATT_9563_EXCLUDED.htm#PDF3_Attachment_80484_4).

**Funding options**


- **Increase general rates**
- **Levy a new targeted rate** as we have done for water quality and natural environment:
  - Option 1: \$33 per ratepayer
  - Option 2: \$40 per ratepayer
  - Option 3: \$71 per ratepayer
- **Reprioritise existing spending** – reduce service levels, for example through lower maintenance spend in open spaces
- **Stopping activities** – for example, can we slow our spending on growth in greenfield areas
- **Other options could be investigated** – for example, asset recycling

} May impact decisions in other lanes

60

46. Ultimately, an increase in general rates was used as the primary source of funding for the climate package, but some reprioritisation and some review of planned activities was undertaken to support the overall 2021-2031 LTP.
47. In addition to directing the development of the specific climate investment package, I was also asked to undertake a high-level review of the whole 2021-2031 LTP through a 'climate lens' analysis.
48. I presented the results of this climate lens review to Auckland Council elected members at an 11 November 2020 Finance and Performance Committee workshop.<sup>7</sup> During the workshop, I provided observations to elected members including in relation to:
- (a) The paucity of data available for quantitative emissions estimates and detailed assessments of climate risk exposure for investment options;
  - (b) The variation in levels of organisational maturity around climate actions; and
  - (c) The lack of clarity in how climate issues had been used to inform decision making and investment options.
49. I also made clear again that in responding to climate change, Auckland Council needed to “do things differently and/or stop doing things.” The relevant slides from my presentation are shown below.


<sup>7</sup> Materials and minutes from this workshop are available here: [https://infocouncil.aucklandcouncil.govt.nz/Open/2021/06/FIN\\_20210617\\_ATT\\_9563\\_EXCLUDED.htm#PDF3\\_Attachment\\_80484\\_9](https://infocouncil.aucklandcouncil.govt.nz/Open/2021/06/FIN_20210617_ATT_9563_EXCLUDED.htm#PDF3_Attachment_80484_9).



**Climate lens: overall observations**

- **Data challenges:** paucity of data to allow quantitative estimate emissions and detailed assessment of climate risk exposure
- **Organisation maturity:** varied, but often limited, particularly with respect to integrated climate action (mitigation and adaptation) and indirect effects
- **Strategic gap:** how climate issues have been used to inform decision making/options/activities is generally unclear

15



**Climate lens: conclusions**

- Responding to climate change requires the organisation to do things differently and/or stop doing things
- Climate issues need to be a central factor in informing prioritisation from the outset.
- Need to build capacity on climate assessments - embed from the start of the decision-making cycle
- Needs to be further supported by organisational direction and leadership.

16

**The notion that climate action is just one of a series of priorities**

50. A final issue to address in response to the respondents' affidavits is the notion that climate action is just one of a series of priorities that the region, and organisations such as Auckland Council and Auckland Transport need to address. See, for example:

- (a) Paragraph 4.1 of Ms Tyler's affidavit: "...one of the many complex and interrelated risks and challenges that Auckland faces"; [[201.0425]]
- (b) Paragraph 334 of Mr Bunn's affidavit: "climate change is only one of four strategic priorities in the GPS"; and [[201.0366]]
- (c) Paragraph 21 of Ms Young-Cooper's affidavit: "It must also be remembered that responding to climate change, while obviously very important, is not the only requirement of an RLTP". [[201.0410]]

51. Climate change is widely recognised as a ‘threat and risk multiplier’. In a recent address, the United Nations Secretary-General António Guterres said that climate change “has a multiplier effect and is an aggravating factor for instability, conflict and terrorism”.<sup>8</sup>
52. At a local level, a climate change risk assessment undertaken to inform the development of Te Tāruke-ā-Tāwhiri identified a host of potential impacts resulting from climate change. These ranged from physical impacts such as coastal inundation and increased forest fire risk, through to ecosystem decline, decreased food security and increased social vulnerability.<sup>9</sup>
53. The breadth and range of these impacts has clear implications for meeting broader regional outcomes, such as those set out in the Auckland Plan, and not just those focused on the natural environment:
- (a) The physical impacts of climate change will affect our ability to ensure “Aucklanders will be able to get where they want to go more easily, safely and sustainably” and to “live in secure, healthy and affordable homes” (page 6 of the Auckland Plan). [302.0638]
  - (b) The socio-economic impacts of climate change will affect the ability of Aucklanders to “be part of and contribute to society, access opportunities, and have the chance to develop to their full potential” and for Auckland to be “prosperous with many opportunities and delivers a better standard of living for everyone” (page 6 of the Auckland Plan). [302.0638]
54. Indeed, while the Auckland Plan acknowledges that the effects of climate change is one of two specific issues that “will continue to have the biggest effect on our environment” (page 14 of the Auckland Plan) – the other being urban development – climate change will also impact on the other two key challenges for the region: population growth and inequity. [302.0646]
55. The interconnectedness of climate action with our broader regional goals is another issue that I raised through my time in the Chief Sustainability Office. In an article that Auckland Council published on OurAuckland on 29 January 2021, I wrote:<sup>10</sup>

...there will inevitably be concerns about our ability to deliver on the climate commitments that we have made, given the need to deal with the implications of COVID-19 alongside a range of other emerging and persistent societal challenges such as housing, inequity, welfare and inclusion.

And whilst each and every one of these issues are equally critical to the sustainability of our communities and wellbeing, there are two critical issues that we cannot overlook.

<sup>8</sup> <https://www.un.org/press/en/2021/sgsm21074.doc.htm>.

<sup>9</sup> This is summarised at pages 55-56 of Te Tāruke-ā-Tāwhiri and available in full here: [301.0244] <https://knowledgeauckland.org.nz/media/1087/tr2019-019-climate-change-risks-in-auckland-arup-march-2019-final.pdf>.

<sup>10</sup> <https://ourauckland.aucklandcouncil.govt.nz/news/2021/01/opinion-the-case-for-climate-action-now/>.

Firstly, these crises are not isolated issues – they are intrinsically linked, often amplifying and intensifying each other, although if we are cognisant of these links, we have the opportunity to develop broad solutions that tackle multiple issues and address the underpinning systemic issues. Secondly, these issues do not line up and wait patiently to be resolved whilst we address the latest pressing emergency.

56. However, concerted action on climate change is not only critical to reducing the potential barriers and risks to achieving the region’s broader outcomes. It can also support the realisation of these goals in a more holistic fashion. This is particularly relevant to the transformation of the transport system.
57. As noted earlier in my evidence, and in Te Tāruke-ā-Tāwhiri, there are a range of interventions that are currently available to rapidly reduce transport-related emissions. Many of these also benefit other transport-related outcomes and objectives, including safety, supporting Auckland’s quality compact urban approach, delivering better transport options, and improving resilience in the transport system.
58. To realise these benefits, as noted earlier in this evidence, the underpinning assumptions, system settings and committed investments need to be critically revisited. On the other hand, if a business-as-usual approach is taken, as in my view was the case with the RLTP, the scale of change required to deliver on the region’s climate commitments will not be achieved.
59. I note that the same conclusion was reached by Auckland Council staff members in a paper presented to the Environment and Climate Change Committee on 2 December 2021 regarding the TERP that is currently under development:<sup>11</sup> [312.5234]

The future of Auckland’s transport system is crucial to our response to climate change, as transport currently accounts for over 40 per cent of the region’s emissions. Achieving the modelled 64 per cent reduction in transport emissions will require transformational change in how people and goods travel in Tāmaki Makaurau. Local and central government will also need to reform many of their planning and investment processes in order to move away from business-as-usual approaches.

60. Finally, Mr Bunn says in his evidence (paragraph 179) that the policy changes needed to achieve the scale of change envisaged by Te Tāruke-ā-Tāwhiri would have “would have major negative social, economic and cultural implications for Aucklanders, along with major equity impacts”. [201.0320]
61. For the reasons I have addressed above, I firmly disagree with that assertion, which fails to take into consideration the major negative impacts on current and future generations of Aucklanders of not adequately addressing the threat of climate change (see, for example, pages 53-63 of Te Tāruke-ā-Tāwhiri). [301.0242]

<sup>11</sup> The paper is available here:

[https://infocouncil.aucklandcouncil.govt.nz/Open/2021/12/ECC\\_20211202\\_AGN\\_1012\\_7\\_AT.PDF](https://infocouncil.aucklandcouncil.govt.nz/Open/2021/12/ECC_20211202_AGN_1012_7_AT.PDF).

62. The social, environmental, economic and cultural benefits of the various actions and sub-actions required to reduce transport emissions are expressly identified in Te Tāruke-ā-Tāwhiri (pages 142-145). As Auckland Council staff noted in their 2 December 2021 paper to the Environment and Climate Change Committee:

[301.0331]  
[312.5242]

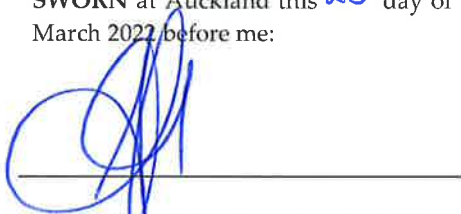
Many of the low carbon policies and investments introduced for emissions reduction purposes would also achieve other social, cultural, environmental, and financial objectives for the region. These include greater access and travel choice, improved public health and road safety, reduced transport costs, improved air quality and noise levels, and greater community resilience.

63. Further, the position that Mr Bunn seeks to advance fails to acknowledge that major equity impacts are present in our current transport system, and that these impacts will only be further exacerbated by a status quo approach to transport investment, particularly in the face of a global transition to a low emissions economy and away from fossil fuel dependence.<sup>12</sup>

SWORN at Auckland this 23 day of  
March 2022 before me:



Chun Yeung (Alec) Tang



A solicitor of the High Court of New  
Zealand

A Ferguson  
solicitor  
Auckland

<sup>12</sup> See, for example, Te Ara Matatika – The Fair Path:

<https://helenclark.foundation/publications-and-media/te-ara-matatika-the-fair-path/>.

<https://helenclark.foundation/publications-and-media/te-ara-matatika-the-fair-path/>

