

Submission by

Hamilton City Council

HĪKINA TE KOHUPARA - KIA MAURI ORA AI TE IWI - TRANSPORT EMISSIONS: PATHWAYS TO NET ZERO BY 2050 - GREEN PAPER (MAY 2021)

25 June 2021

1.0 EXECUTIVE SUMMARY

- 1.1 Support the overall intent of the Ministry of Transport's 21 May 2021 Green Paper **Hīkina te Kohupara - Kia Mauri ora ai te Iwi - Transport Emissions: Pathways to Net Zero by 2050**.
- 1.2 Support the Avoid, Shift, Improve Framework underpinning the approach to the Green Paper and emissions reduction in the transport sector. As well as reducing the need to travel, we see increasing mode shift as being the priority for Hamilton.
- 1.3 Investment needs to align with the Avoid, Shift, Improve Framework - the current Government Policy Statement on Land Transport 2021/22 - 2030/31 does not provide the necessary signals and investment to achieve the emissions reductions required.
- 1.4 The Green Paper is a good start in outlining an approach to reducing transport emissions. We are supportive of Pathways One and Four as outlined in Chapter 10 of the Green Paper, as they have the strongest focus on Theme 1: Changing the way we travel.

2.0 INTRODUCTION

- 2.1 Hamilton City Council would like to thank the Ministry of Transport for the opportunity to make a submission to its 21 May 2021 Green Paper '**Hīkina te Kohupara - Kia Mauri ora ai te Iwi - Transport Emissions: Pathways to Net Zero by 2050**'.
- 2.2 As a growing metro city and Council, in 2018/19 transport accounted for 64% of greenhouse gas emissions in Hamilton. Most of these emissions (86%) came from on road transport. Without significant investment in mode shift, for both people and freight, this will continue to increase as the city grows.
- 2.3 Urban form decisions occurring in the next few years in response to Government policy and growth will lock in either low or high carbon futures for our community. There is an urgent need for guidance and investment to ensure that future developments support low carbon living, especially around reducing the reliance on private vehicles.

3.0 MODE SHIFT IS A PRIORITY

- 3.1 We are supportive of the use of the Avoid, Shift, Improve Framework, and the prioritisation of actions that support reducing trips and trip lengths and increasing the use of active transport, public transport and new forms of shared transport.
- 3.2 Reducing the need to travel by car is not just the responsibility of the Ministry of Transport - this needs to be recognised and the importance of urban planning in minimising vehicle

movement will be essential. The Ministry of Education also has an important role in this space in reducing the use of cars through the location and zoning of schools.

- 3.3 This Green Paper is too focused on the role of the Ministry of Transport. The Transport Strategic Emissions Action Plan needs to be a whole of government approach. As noted in the Green Paper, significant actions to achieve the Avoid and Shift outcomes are reliant on other areas of Government.
- 3.4 We would encourage the Government to progress the work started in the 'Reshaping Streets - Scoping Study' published by the Ministry of Transport in May 2021. We agree with many of the challenges outlined in the report as well as the priority areas for change.

4.0 REALIGN INVESTMENT

- 4.1 The current investment in active transport and public transport is far too low. The investment levels in the GPS 2021 are not going to achieve the greenhouse gas emission reductions required by the transport sector.
- 4.2 Investment needs to align with the need to rapidly increase mode shift and should reflect the lack of investment in this area to date. Waiting until 2024 for an updated GPS and Regional Land Transport Plans will be too late.
- 4.3 Investment is needed in both the hard and soft infrastructure to support mode shift, especially biking and micromobility. For example, through funding school travel coordinators and the development of school travel planning.
- 4.4 As noted in the Green Paper, we support setting higher Funding Assistance Rates for mode shift projects as a supporting incentive for prioritising active and public transport.

5.0 ROLE OF ELECTRIC VEHICLES

- 5.1 We recognise that electric vehicles will play an important part in the way we travel in the future. We believe caution needs to be taken with the extent that the use and ownership of private electric vehicles will play in transitioning to a zero-carbon future. The current focus on just the operational emissions means that the embodied emissions of the production of electric vehicles are not being factored into decision-making.
- 5.2 We support the investment in electric buses and other public transport and mass transit options. This will provide opportunities for electric vehicles to significantly reduce emissions through mode shift as well as improving efficiency of the vehicles.
- 5.3 We are not supportive of excluding micromobility and shared mobility from the modelling and the future opportunities. These two options are growing, and overseas examples demonstrate that the e-bikes, e-scooters and electric shared cars can play a very important role in the transport system.

6.0 RESPONSE TO SPECIFIC CONSULTATION QUESTIONS

- 6.1 **Consultation Question 1** - We support the principles outlined in the Green Paper and suggest that education needs to be incorporated into Principles 4 and 7 to better reflect that this will be critical for both the factors involved in the transport system and the community.
- 6.2 **Consultation Question 2** - This section is too Ministry of Transport centric - it does not reflect the true integrated approach that will be required for transport to transition. The section 'Collaboration with other sectors' does not reflect the multiple roles that Government has to regulate and invest across other sectors that have direct transport impacts. For example, the National Policy Statement on Urban Development has the potential to achieve reductions in vehicle kilometers travelled due to greater density in appropriate locations. The location and zoning of schools is also another key aspect that the Government can directly control.

- 6.3 The Government fleet and travel planning is also one area where Government can demonstrate leadership, through developing workplace travel plans and investing in innovative fleet options.
- 6.4 **Consultation Question 3** - We support the continued investment in new innovative concepts, drawing on successful examples from overseas. We would also recommend investment in innovation that supports the Avoid Step, especially around reducing the need to travel for work.
- 6.5 Innovation opportunities could also be achieved through the education sector. By investing in innovative school travel planning ideas, we can support students to use public and active transport before they become the next generation of people using our transport network.
- 6.6 **Consultation Question 4** - To better integrate transport, land use and urban development we would recommend prioritising placemaking. We are supportive of the development of the One Network Framework and the focus of Movement and Place. Placemaking and inclusive street design is important for the future development of urban cities. This could be done by telling a different story, for example, that quality of travel does not need to involve two or more vehicles per household. There are many overseas examples that support and incorporate good design for transport infrastructure which could be adopted here in Aotearoa. There needs to be better incorporation of land use and development that supports and prioritises good active and public transport links to amenities, schools, and workplaces.
- 6.7 In Hamilton, we are experiencing out of sequence development of greenfield areas - this means that the timing doesn't align with the introduction of public transport services for the development area. The Government could provide the framework for councils to require developers in these situations to provide the public transport and active transport infrastructure and for developers to support the initial service delivery.
- 6.8 **Consultation Question 5** - The Green Paper covers many of the alternative travel options that currently exist. Whilst future modes such as drone technology are unlikely to transform the way we travel in the short-term, greater consideration of micromobility and bike share should be incorporated. These modes have increased exponentially in the last couple of years. Lime e-scooters have been operating in Hamilton for 21 months and during this time, over 427,000 rides have been taken and over 614,000km travelled.
- 6.9 We also would support the incorporation of a Universal Design approach to transport that delivers on Vision Zero for all users of the transport system.
- 6.10 **Consultation Question 6** - We are supportive of using pricing mechanisms such as a fuel tax to encourage the shift to lower emissions transport. Pricing is an important signal to support behaviour change. The timing around introducing changes in pricing will be critical to minimise impacts on low income and those who have no other options for travel. Currently the public transport network is not providing a level of service that enables an easy switch of mode. We would support the funding from these new sources being ringfenced for public transport or active transport improvements.
- 6.11 **Consultation Question 8** - As outlined in the Green Paper, decarbonising the public transport fleet becomes more important as patronage increases. We support the initiatives to increase the uptake of electric buses and for Government to provide support for the network infrastructure. As well as electrification of existing rail, the Government should investigate opportunities to invest in new electric mass transit in the large metro areas.
- 6.12 **Consultation Question 10** - We support the development of a National Freight Strategy that puts decarbonisation of freight as a key outcome. The Strategy should also look at the short, medium and long-term future of freight and provide clear direction for infrastructure

development requirements, like the Ruakura Inland Port and Logistics Hub located in Hamilton.

- 6.13 **Consultation Question 11** - Understanding the long-term decarbonisation pathway for transport, and the freight sector in particular, is critical for knowing what investment needs to be made in future fuel sources and associated infrastructure. When Government is planning out this pathway, it will be important to consider the broader environment, economic and social impacts and the lifecycle of the fuel source and the vehicles and not just the greenhouse gas emissions.
- 6.14 **Consultation Question 13** - We are supportive of a strong focus on Theme 1. We recognise that electrification will be an important part of decarbonising and transforming our transport system, however it is not the 'silver bullet'. Sustainable and alternative modes will play a very important role in the way that we move around.
- 6.15 Proactive and courageous leadership across all sectors is going to be key as this will affect everyone at some level. Setting some achievable government policies and guidance to make sure that people understand why we need to change and how we are going to get there will be critical.
- 6.16 **Consultation Question 14** - We support action on improving urban form and spatial planning, realising the benefits through existing reforms will be essential for achieving emissions reductions now and in the long-term.
- 6.17 Whilst the GPS does currently include climate change as a strategic priority, it is not strong enough to instigate the change required. This is reflected in Regional Land Transport Plans and the investments proposed for the next 3 years. Changes in investment need to happen much sooner. Either the GPS needs to be reviewed and updated to better embed climate change and deliver an appropriate level of investment, or alternative investment options need to be provided. We would recommend all future policies should be assessed for their emissions reduction contribution.

7.0 FURTHER INFORMATION AND OPPORTUNITY TO DISCUSS OUR SUBMISSION

- 7.1 Should the Ministry of Transport require clarification of Hamilton City Council's submission, or additional information, please contact **Charlotte Catmur** (Sustainability and Environment Advisor) on 07 838 6538 or email charlotte.catmur@hcc.govt.nz in the first instance.
- 7.2 Hamilton City Council would welcome the opportunity to discuss the content of our submission with the Ministry of Transport in more detail.

Yours faithfully



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CHIEF EXECUTIVE