

# HAMILTON CITY COUNCIL SUBMISSION

## Towards a Productive, Sustainable and Inclusive Economy: Aotearoa New Zealand's First Emissions Reduction Plan

Parliament's Environment Committee



1 July 2022



**Hamilton  
City Council**  
Te kaunihera o Kirikiriroa

# Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to the priority '**A green city**'.

The focus of this priority is to become a sustainable city by challenging the way we grow our city and how we live within our city. To achieve this, we want to take a thoughtful and city-wide partnership approach between businesses, organisations and community groups to tackle how the city responds to climate change.

## Council Approval and Reference

This submission was approved (under delegated authority) by the Chair and Deputy Chair of Hamilton City Council's Infrastructure Operations Committee (as resolved at the Council's 31 May 2022 Infrastructure Operations Committee meeting).

Hamilton City Council Reference D-4249735 - submission # 691.

## Key Messages and Recommendations

- 1.** Hamilton City Council support the First Emissions Reduction Plan (ERP) and support the actions outlined throughout. We acknowledge that local government has a key role to play at the local level.
- 2.** For local government, a key priority must be setting a clear roadmap for action to take place, including the key short-term priorities related to key reforms. Local government needs to understand more clearly how the emissions targets relate to specific actions, so that we can understand our opportunities early.
- 3.** We recommend central government provide clear funding opportunities for local government, widen other current funding mechanisms to include local government and work with the Local Government Funding Agency to offer a more competitive rate on Green, Social and Sustainable loans. This should include more opportunities to achieve easy wins such as replacing gas boilers.
- 4.** As a Tier 1 Council we are disappointed that we are not given priority funding opportunities for mode-shift. High growth cities such as Hamilton need more funding prioritisation. We request that the Hamilton metro area is listed as a priority for public transport investment.
- 5.** We require better clarification of the metrics of emissions budget and a breakdown of the targets to a regional level to achieve the budgets. We recommend that central government needs to lead a national approach at ensuring consistency and benchmarking of emissions measurement, recording, and verification.
- 6.** We require leadership from central government to develop the tools required at a local government level, so that we are not duplicating time, energy and resource to create what's required. This includes tools for measuring, forecasting and reporting on emissions regionally and locally, carbon calculations tools suited to local government, and tools to factor climate change considerations into planning decisions, business cases and investment decisions.
- 7.** We recommend central government consider the time criticality associated with making long-term decisions about infrastructure. We would like to see the actions within the ERP outlined in a timeframe linked to the three emission budgets.
- 8.** The ERP notes that central government will develop urban plan guidance on blue and green infrastructure and water sensitive urban design. We support the action and recommend proactive engagement with local government to develop the guidance.
- 9.** We recommend more emphasis is placed on education and behaviour change and recommend that a dedicated behaviour change entity is established and that appropriate funding is provided at both the national and local level.
- 10.** We agree with LGNZ's recommendations in its submission to the ERP, including the need for clarity on what councils' responsibilities under the ERP will be, clarity on how the ERP will be funded, and the need for partnership with local government to support necessary action at the local level.
- 11.** We support that the ERP must align with other central government led reform and policy work programmes that are underway. We have further outlined our support for LGNZ's submission in our additional feedback to the ERP, following our response to key questions in this document.

## Introduction

12. Hamilton City Council commend the release of New Zealand's first Emissions Reduction Plan (ERP). We support the direction for councils to embed climate change throughout their work and decisions and to align their funding and finance to both emissions' reduction and climate adaptation.
13. As New Zealand's fourth largest city with a fast-growing population, we have a great opportunity and a high desire to become a leading example of a climate ready city and would like to take every opportunity to achieve this.
14. Many of the actions in the ERP sit with local councils, but for councils to succeed we need:
  - A clearer roadmap.
  - Clear communication of the metrics and assumptions in the emissions budget to enable us to develop our own emissions reduction pathway.
  - A clear understanding of the funding opportunities and mechanisms that are and will become available.
  - Leadership from central government to establish national tools for local government to measure, monitor and assess.
  - A much bigger national climate response regarding education and behaviour change campaigns.
15. We would like to thank Parliament's Environment Committee for allowing Hamilton City Council an extension to the official 27 June submission closing date through to 1 July 2022 (noting that our request was due to the numerous and increasing number of Government department consultation papers (as well as Government Bills), which is proving to be extremely challenging to Council from a resource (staff and Elected Members) and time management perspective).

## Response to the Environment Committee's Key Questions

16. The following feedback is provided in response to the key questions outlined on the webpage of Parliament's Environment Committee.
17. **Is the emissions budget for 2022-25 achievable, and if not, what additional actions or changes to the key actions in the Emissions Reduction Plan would make it more likely the budget was achieved? Please state reasons.**
18. **MORE STRATEGIC FOCUS**
19. Hamilton City Council is of the view that a clear roadmap for all sectors is required for the first Emissions Budget to be achievable.
20. The ERP covers a lot of ground. Whilst we fully recognise the enormity of the task, there needs to be an analysis and communication of what the big early wins are for each sector, and what the priorities for the first few years need to be.
21. The ERP reflects a role for local government across more than half of the areas of work. Most councils will not be ready to commence this journey. Many councils do not yet have the capacity required, and the larger councils that are better resourced have the challenge of creating change across complex organisations. Placing this within the current volume of reform for councils (which we acknowledge clearly has a solid aim of setting the direction for councils to be climate ready) poses some immediate key challenges and risk for councils to achieve the reductions required in the first budget.

22. Whilst some councils have begun their journey to reduce their emissions, understanding the opportunities to influence regional emissions is challenging. More analysis of the opportunities and a clearer strategic focus on a national level would enable councils to begin this sooner and increase the chances of their response impacting the first emissions budget.
23. More work is required for central government to communicate the assumptions beneath the emissions budget. The challenge is much greater when we are trying to meet a budget that we cannot see. The lack of knowledge about the assumptions makes it even more challenging to set an achievable emissions reduction pathway for each region.
24. **RECOGNITION OF TIME CRITICAL ACTIONS**
25. Central government needs to consider the time criticality associated with making long-term decisions about infrastructure. The lead in time for planning can be varied depending on the type of action and funding approval. Infrastructure decisions take a long time to progress from scoping, business case development, and funding through to construction stage. This means that meeting carbon targets for constructions beginning in 2024 would require us to make scoping decisions in 2022. Councils will need to understand their actions at key decision-making stages (a roadmap of actions) so that they are ready to meet 2025 targets and be on-track to meet the subsequent targets. We would like to see the actions within the ERP outlined in a timeframe linked to the three emission budgets.
26. **Is the emissions budget for 2026-30 achievable and if not, what additional actions or changes to the key actions in the Emissions Reduction Plan would make it more likely the budget was achieved? Please state reasons.**
27. **TRANSPORT**
28. The highest percentage of Hamilton City's emissions are from transport – accounting for 64 percent of our emissions profile in 2018/19. Currently we have some of the highest car use rates for trip-making in the country, and 60 percent of all car trips in Hamilton are less than 5km (the equivalent of a 20-minute bike ride). A large proportion of car trips are single occupancy. However, the typography and geography of our city – that it is relatively flat and only 7kms at its widest and 13km at its longest – means that we have a huge opportunity to better incorporate walking, cycling and other micro-mobility modes. Mode shift could therefore be a big win for our city and drastically reduce our emissions.
29. Without significant investment into transport now, Hamilton City will not achieve the second emissions budget.
30. We are disappointed that Hamilton is not given priority funding in the need for delivering major public transport service and infrastructure improvements. Work should be done not only with 'Auckland, Wellington and Christchurch', but with other Tier 1 councils such as Hamilton and Tauranga.
31. According to Waka Kotahi NZ Transport Agency (Kiatina Ke Taiao – Sustainability Monitoring Report), the Waikato Region has the second highest transport emissions and VKT in the country (higher than Wellington and Christchurch). It is a significant oversight that the 'Hamilton Metro Area' (as per the Hamilton - Waikato Metro Spatial Plan) is not considered a high priority for transport funding. We request that this is resolved, and that the Hamilton Metro Area (the Hamilton - Waikato Metro Spatial Plan) is given high priority for transport funding.

32. Hamilton City Council has significant plans to increase Biking and Micro-mobility for our city. The Biking and Micro-mobility Business Case, which is going to the Waka Kotahi NZ Transport Agency Board for endorsement in September 2022, proposes a significant programme of work over the next 10 years to improve Hamilton’s cycling network. It has a strong focus on ‘transitional infrastructure’, which will allow us to roll out a large amount of network quickly, with the potential to deliver significant emissions benefits. However, we need greater funding support to progress this work.
33. Hamilton is currently experiencing high growth. The design potential that comes only at the time of expansion, would be a huge opportunity missed. It would be more efficient and cheaper to help us address our transport issues now, rather than tackling bigger, more expensive problems in the future.
34. **What type of monitoring and reporting would enable you to be confident that the key actions in the Emissions Reduction Plan are being implemented, and that emissions are falling in line with the emissions budgets? Please state reasons.**
35. **BETTER CLARIFICATION OF THE METRICS OF EMISSIONS BUDGET AND TARGETS**
36. It would be useful to have assumptions and short-term targets translated so that organisations can understand them without having to engage specialist organisations.
37. Communicating emissions reductions by percentage changes required for each sector and each budget would be more meaningful.
38. For example, more clarity of what percentage change is expected from Electric Vehicles (EVs), Freight, Cycleways, and Public Transport (PT) nationally would help different sectors understand more clearly what is required.
39. A breakdown of what the emissions budget means in urban and rural areas is required. For example, cities need to understand what level mode shift and vehicle electrification is required in urban areas versus the limited change we might expect to see in rural areas, if as a nation we are to achieve the national targets.
40. Explaining/factoring in projected population increase on a national level will help us understand what is required.
41. More work is required for central government to communicate the assumptions beneath the emissions budget. The challenge is much greater when we are trying to meet a budget that we cannot see. The lack of knowledge about the assumptions makes it even more challenging to set an achievable emissions reduction pathway for each region.
42. **CONSISTENCY AND BENCHMARKING**
43. We recommend that central government leads a national approach at ensuring consistency and benchmarking of emissions measurement, recording, and verification. The Carbon Neutral Government Programme lays out a clear and concise way of undertaking that through the Scope 1 2 and 3 emissions matrix. This is something that could be expanded to include local and regional emissions and it would minimise the need to ‘reinvent the wheel’.
44. **What tools or initiatives would help implement the key actions in the Emissions Reduction Plan and why?**
45. **TOOLS AND RESOURCES**
46. The councils that are preparing to respond to climate change are currently lacking some of the key information and the tools required, including (but not limited to), the tools required for monitoring and reporting regional emissions, and the ability to break that down to a local level.

47. Monitoring of emissions on a community size scale is problematic with the current data available. It would be great to see sharing of detailed data usage from high carbon utility and fuel companies by district and region so that we can track progress on a quarterly basis rather than a report once every few years. We request that central government look into the opportunity for Statistics New Zealand to carry this out on behalf of all local government authorities.
48. We are finding that several councils are investing in creating tools to guide decisions, measure emissions and more. While councils are keen to share, we are finding the tools are often not developed in a way that is easily transferable, contractors who are developing the tools are not sharing what they are currently working on or developing, and no one has a full picture of what is available, being developed or best practice. We know these types of tools have been developed and used in Europe, by some of the same companies that are 'developing' them here in New Zealand. So, there should be more options that are readily available, and we don't believe councils should be repeatedly fronting the cost to develop these tools in each region.
49. We request that central government take the lead in supporting a coordinated approach to developing tools that are 'fit for purpose' in allowing us to measure and report emissions at a regional and local level, and make sound financial decisions, so that we can better prioritise our limited funding and resources i.e., not continue funding the development of such tools individually.
50. **EDUCATION AND BEHAVIOUR CHANGE**
51. Education and behaviour change is a key focus required that is lacking in the ERP. Whilst climate change absolutely should not be placed on the shoulders of the consumer, there is still a very large role that education and behaviour change has to play to drive the changes required. To get this right requires an understanding of behaviour triggers (or nudges) that can be implemented through a combination of behaviour tools that includes the structural element, incentives, social norms, education, communication and more.
52. Behaviour science is well established internationally and known to be highly effective in changing social behaviours in the fields of health and sustainability (unlike social marketing, which is now well known as an ineffective tool to drive behaviour).
53. There is a significant role that local government can play in delivering behaviour change programmes. We support the Climate Change Commission's recommendation that a dedicated behaviour change entity is established and that appropriate funding is provided at both the national and local level.
54. While we support that there should be a national level campaign, the current Gen Less campaign is not far reaching or targeted enough to create significant change.
55. We know climate change will become significantly more disruptive than Covid -19 in the future. A campaign to this scale is required. Key messages and branding associated need to be recognised nationally and drive successful action.
56. Local councils should be involved in a nationwide campaign. For example, if the collateral for the Gen Less campaigns was available to councils it could be adapted for each region.
57. This would help with giving the issue of climate change the status of importance that it deserves, as it would be a uniform campaign coming from top-down/national direction and easily recognisable, but any key messages would still be community-focused at the local level.
58. We support the ERP's action to investigate the benefits of a Climate Information Centre. This would have significant and wide-reaching benefits for innovation, information sharing, preventing misinformation and enabling informed action.



**59. Any analysis of the costs and benefits of the actions in the Emissions Reduction Plan, the adequacy of the costs and benefits analysis, and any gaps.**

**60. FUNDING MECHANISMS**

**61.** The ERP states very clearly that local government has a key role in the delivery of the plan, and is responsible for funding and financing local projects, including infrastructure. However, councils are yet to understand how they will fund the required response.

**62.** We require further information from central government to advise on what the current funding mechanisms include, what is currently available, what will become available, and when.

**63.** We support the intent of the ERP to encourage green investment initiatives. However, there is a disconnect between national initiatives and local involvement throughout the ERP. We recommend that central government fill this gap by providing a clearer direction and membership opportunities to the regions.

**64.** Current Green, Social and Sustainable loans offer only a very small reduction in the interest rate and therefore only see significant savings in very large-scale multi-million-dollar projects (and in comparison to the scale of the project, the saving is then relatively small). We ask that central government work with the Local Government Funding Agency to offer a more competitive rate.

**65.** Compared to the emphasised role of local government action and involvement, the funding options signaled to date are inadequate. We request that central government consult with local government and work to develop suitable funding mechanisms and clear pathways for councils to make sound and sustainable investment, and establish the funds required to start reducing emissions now.

**66.** We support the need for the Carbon Neutral Investment Programme. Although it's slightly unclear, it does seem that this funding is targeted for central government. We believe this fund needs to be substantially larger to achieve more. We request that the programme and funding available is widened to support local government. Opportunities that both reduce emissions and save money over time should be a clear strategic priority for all. All sectors and households need to understand the opportunities for renewable energy and efficiency with a focus on potential payback periods and specific targeted interest free and low interest loans made available.

**67.** One of the quick wins that local councils can make is to shift away from natural gas use. The practical alternatives are electric hot water heat pumps, but the capital cost of these items is many times that of a gas boiler and operational costs are similar. The Government has provided funding to central government departments and large private companies to decarbonise boilers but not to assist local government. We request that central government looks to widen these funding mechanisms to include local government.

**68.** The current Climate Emergency Response Fund is inadequate to achieve the first and subsequent emissions budgets. The ERP itself does not provide any clarity of what opportunities for Green Bonds, New Zealand Green Investment or Crown Responsible Finance will mean for local government or industry, therefore it is hard to comment on whether this will make up the shortfall.

**69.** The ERP states that councils will need to ensure that their investments and spending align with climate objectives. Hamilton City Council fully supports this direction. However, councils require the tools and information to assess options and guide decisions. Most councils do not have the capacity to build these tools, and as mentioned in the 'Tools and Resources' section of this submission, a coordinated approach is required. For fast action, central government needs to provide a stronger lead to develop the right mechanisms and tools and share tools that are currently available, such as the Cost Benefit Analysis tool previously mentioned.



70. Whilst Hamilton City Council fully supports the need to align our investment decisions with climate objectives, we believe there should be firmer directions for councils who may not be aligned. All councils would benefit from clear direction for making sound investment decisions in relation to climate change, such as mandating requirements for large investment decisions.
71. There is an opportunity for our climate response to drive social innovation and build strength and resilience in our communities, by creating more opportunities for social enterprise and community owned and driven responses. We believe this opportunity is missing from the suite of funding and finance mechanisms. This is a key shortfall to achieving an equitable transition, and the current Draft National Adaptation Plan. We are aware that Auckland Council has established a social innovation program and there are already educational, entrepreneurial and grass roots organisations that have been building capacity across a range of initiatives. It is disappointing that there is very little consideration of supporting a more diverse range of sustainable economic solutions, that would support a circular economy on a local scale. Strategically, this could be a low-cost solution to emissions reduction, with opportunity for financial payback and key benefits of building social capital and climate resilience.
72. We request that central government develop a start-up loan scheme to support new local, social, sustainable enterprises that would support local innovation and drive a circular economy.
73. We recommend central government provide some certainty for the funding available for the Three Waters infrastructure to reduce the sector's emissions. While the Government has indicated that some funding may be provided as part of the Three Waters reform, there is uncertainty around allocation of funds for emissions reduction initiatives.
74. **Are there other key actions which can better achieve the emissions budgets than those in the Emissions Reduction Plan, what are they, and why are they more likely to succeed?**
75. We notice that the ERP provides no mention of the link between diet and climate change. The ERP highlights how agricultural emissions make up half of the country's greenhouse gas emissions, and that three-quarters of agricultural emissions are biogenic methane from livestock, but omits arguably one of the easiest solutions to this problem – educating and encouraging people to eat less meat and shift to more plant-based diets.
76. Diversifying our agricultural opportunities to include more plant-based food sources will reduce our emissions and can build our resilience to climate change physically and economically.
77. It is now very well known (and there are extensive studies that show) that incorporating more plant-based foods into our diets can result in lower emissions, less use of water and land, as well as other co-benefits such as positive health impacts. Therefore, this should be part of our national response to climate change and mentioned in the ERP. Central government can support our current agriculture industry to make a viable and significant transition to a low-carbon future and make the emissions reductions urgent and easy for people to do through promoting things like dietary changes.
78. Hamilton City Council recommends the ERP to provide the Three Waters Infrastructure more direction in the next ERP to be published in 2024. It would be a missed opportunity for the sector to not be contributing to the national reduction targets.
79. **ADDITIONAL FEEDBACK ON THE EMISSIONS REDUCTION PLAN**
80. **Support for LGNZ's Submission**
81. We agree with the following recommendations (outlined in italics) in LGNZ's submission to the Emissions Reduction Plan.

82. *The Government needs to provide much more clarity on what councils' responsibilities under the ERP will be, specifically their role in setting targets and delivering emissions reduction actions.*
83. *Considerably more work is needed to identify how the actions set out in the ERP will be funded. The ERP does not demonstrate how the Government will provide substantially greater investment to ensure Aotearoa New Zealand can meet its carbon zero goals.*
84. *The need for Government to adopt a principle that any new policy to achieve carbon zero is supported with appropriate national level funding and an analysis of the funding that will be required at regional and local levels to support implementation.*
85. *To support the move to a circular economy the Government will need to review what funding and financing models, and tools, will be needed.*
86. *Central government funding to support changes to and the development of street space for public transport, walking, cycling and shared mobility infrastructure in urban areas will be critical to achieving transport goals.*
87. *To successfully deliver the ERP, partnership with local government is crucial. To support necessary action at the local level, the Government should partner (and not just collaborate) with local government.*
88. *Local government will need support and guidance from central government to build capacity and capability, understand their roles and responsibilities for emissions reductions and ensure they have the tools and resources needed.*
89. *It is critical that work on the ERP aligns with other central government led reform and policy work programmes that are underway, including the reform of the Resource Management system, Three Waters reform, the Future for Local Government review, the National Policy Statement for Urban Development and development of the National Adaptation Plan, to name but a few.*
90. *The ERP contains no regional emissions reduction targets or expectation on how emission reductions will be regionally distributed. National direction should be developed in partnership with local government, with a collaborative approach to set regional emissions reduction targets that are guided by local perspectives, abilities and objectives.*
91. *Local government would benefit from access to a range of consistent, easy to use tools, guidance and resources to support it (and its communities) to contribute to emissions reductions, including:*
  - *Consistent tools for measuring, forecasting and reporting on emissions.*
  - *Guidance on how to set emissions reduction targets for districts/regions that are aligned with national targets.*
  - *Calculating embedded carbon across buildings and the infrastructure asset lifecycle – from construction to use, maintenance and end-of-life.*
  - *Factoring climate change considerations into planning decisions, business cases and investment decisions.*
  - *Best practice guidance on behaviour change and communication approaches.*
92. *The ERP needs a stronger focus on how to support households, Iwi/Māori, communities, and businesses to transition to lower-emissions alternatives. A national campaign to drive emissions reduction behaviour change.*
93. *Additional feedback by Hamilton City Council follows and is structured under the key headings in the ERP.*
94. **Playing our Part**
95. *Hamilton City Council agrees with and supports the purpose of the ERP.*

96. We recommend that central government should clarify the subsector targets (as noted on page 32 of the ERP). More specifically, the ‘fit’ of Three Waters services in the sectors and the subsequent budget that the service would need to operate under need to be clarified.
97. The ERP mentions that *“Central and local government will work in partnership, alongside Māori, to align policies and deliver actions to meet our 2050 targets”*. Although we support the intent of the partnership, the ERP would need to provide firmer direction to materialise the partnership.
98. We agree that *“Local government will need support and guidance from central government to build capacity and capability, understand their roles and responsibilities for emissions reduction and ensure they have the tools and resources needed for change, particularly in the first two emission budget periods”*. We recommend that central government needs to highlight a pathway and tangible actions to demonstrate the future support from the central government to the local governments.
99. We support the intent of the ERP to further international engagement and demonstrate leadership.
- 100. Empowering Māori**
101. Hamilton City Council supports the ERP’s recognition of the role of Māori to *“care for water, native forests, and biodiversity as taonga”* (page 46).
102. He Pou Manawa Ora - Pillars of Wellbeing is a Council strategy which outlines Hamilton City Council’s vision for a city that celebrates its whole history, including its unique maaori heritage, and ensures everyone has a voice in developing its future. The strategy highlights the role of Mana Whenua as kaitiaki (guardians) of the natural environment and supported by the community in this role (Pillar of Restoration).
103. We also actively recognise the role of maaori to care for the environment through existing projects such as metro special planning, supporting infrastructure planning and formalising relations through joint management agreements.
- 104. Equitable Transition**
105. We support the intention of the ERP to enable equitable transition.
106. We also support the action to *“Support regions and industries to manage the transition”* (page 69) and *“Support localised and community-based solutions”* (page 77).
107. We recommend that central government should elaborate on the measures to enhance support to the regions and to provide some certainty.
108. We support the allocation of *“NZ \$200 million into a Regional Strategic Partnership Fund that, guided by regional priorities, supports the development of more productive, resilient, sustainable, inclusive and Māori-enabling regional economies”* (page 69). We recommend that central government provides further links and guidance to enable the regions to tap into the fund.
- 109. Working with Nature**
110. We agree that further research at local level is required (page 88). However, building a knowledge base would require significant funding and reprioritisation at a local level.
111. We agree that we need to *“prioritise the use of nature-based solutions within our planning and regulatory systems, where possible, for both carbon removals and climate change adaptation”* (page 89). This would require more research in the reprioritisation space, as councils often have budget constraints.

112. We support the intent to develop an *“integrated work programme to deliver climate, biodiversity and wider environmental outcomes”* (page 90). We recommend that the ERP includes research for water infrastructure and involvement of local government.
113. Although we support the implementation of the National Policy Statement for Freshwater Management, further definition of the links between the NPS and emissions reduction are required. It would be helpful for the ERP to develop specific actions that prevent the loss of natural and artificial inland wetlands and are supplemented with the carbon calculations (page 92).
114. The ERP mentions that the reform of the Resource Management Act will demonstrate *“the role nature-based solutions can play in urban development and in managing the impacts of sea-level rise and flooding”*. However, there is no specific link to actionable and measurable emissions reduction associated with the reforms. This is an area that needs to be further researched and developed.
115. **Funding and Finance**
116. See response to key questions - funding mechanisms.
117. **Planning and Infrastructure**
118. The ERP notes that central government will develop urban plan guidance on blue and green infrastructure and water sensitive urban design. We support the action and recommend proactive engagement with local government to develop the guidance.
119. Wastewater treatment plants that produce biogas have a valuable low carbon fuel source. It is recommended that Government actively assist by incentivising owners of these facilities to utilise and expand upon this resource.
120. **Research, Science, Innovation and Technology**
121. The ERP notes an action to *“Scale up and further target existing initiatives towards climate change”* (page 154). We support this action and recommend trialing this approach on the water industry transformation post 2024.
122. **Transport**
123. Although we largely support the transport recommendations outlined in the ERP, we would like to see significant investment as priority funding to reduce VKT in and around Hamilton (refer specific questions - 27. Transport).
124. We would like to see greater recognition of equality, and equity in mode shift projects with more work being done for school children, those who are disabled, over 65+ and low-income earners. The target of a 41 percent reduction in emissions by 2035 is ambitious, and we would like to see strong government influence as to the need to re-evaluate, prioritise and provide more funding for mode shift projects. We also would like to see that the funding for PT and active modes and mode shift is prioritised over roading and further highway development.
125. It is important to emphasise that the future of transport is not cars - not even electric cars, it's simply mass transit, and active modes. Electric vehicles still lead to the congestion and safety issues, that every city faces.
126. Half of the challenge is the need for behaviour change, and we would like to see more working being done in education and community awareness.
127. *Actions the government are taking to reduce transport emissions (pg.172):* We support the ambitious 41 percent reduction in emissions and would like to see how the rapid push for mode shift and the required multimodal infrastructure will be met with strong funding support and education campaigns to help facilitate the needed behavioural change.

128. We are concerned that the language used “*support people to walk, cycle and use PT*” will not enable an effective response. There has been a lot of work done internationally on mode shift (C40 cities has many examples), and it is evident that this approach is not sufficient. We need to see a firmer stance, for example: “*prioritise funding to enable people to choose the low VKT option first*”.
129. While the four targets outlined are good, there is room to strengthen the importance and alignment with public transport and active modes.
130. *Transport Route Map to 2035 (pg.174)*: 2022: PT made more affordable for low-income New Zealanders’ – this is critical to enable equitable transport options for those on lower incomes. We would like to see work done to make this permanent - potentially with school children having access to cheap/free PT. Revising the national Mode Shift Plan for 2023 is excellent and its timing will be well received. It would be good to see behaviour change campaigns rolled out to help education all New Zealanders.
131. **Focus Area One**
132. *Public Transport (pg.178)*: Regarding delivering major public transport service and infrastructure improvements, work should be done not only with “Auckland, Wellington and Christchurch” but with other Tier 1 councils such as Hamilton and Tauranga.
133. More emphasis should be given to inter-regional PT services such as Te Huia on H2A. As part of the ‘Golden Triangle’, it is important to prioritise connections between Auckland and Hamilton for passenger rail. Providing both ridership and coverage services is essential for those other satellite towns, including Pukekohe, Pokeno and Te Kauwhata to have better PT connections to metro hubs like Auckland and Hamilton, without the need of reliance on private vehicles or future park and ride concepts – this is a huge opportunity for VKT reduction.
134. All traffic lights on any key rapid/frequent transit PT route should have bus prioritisation measures in place by end of 2023.
135. *Walking and Cycling*: Greater funding needs to be provided for walking and cycling improvements, such as the Cycling Emission Reduction Fund if we are to deliver these projects sooner, as local councils can experience funding barriers with delivery deadlines being outside of local LTP and Annual Plan processes.
136. *School Travel (pg.179)*: Further work needs to be done to prioritise funding for school walking and cycling, with clear direction to support this objective at both a regional and local level.
137. *Congestion charging and pricing (pg.180)*: We support the increase of paid parking charges as a way to reduce dependency on private vehicles. However, it should be noted that before any VKT pricing and low-emission zones are in place, there needs to be viable transport alternatives available. This recognises the need to have a significant improvement of both the routes, safety and reliability of PT and multi-modal alternatives, to consider their viability.
138. Investigation of congestion charging is important and a great tool in reduction of people’s reliance on private vehicles. However, it needs to be noted that before this is active, other steps need to be made first, to ensure we don’t further disadvantage vulnerable communities who don’t have a viable alternative mode of transport.
139. *Nature Based Solutions (pg.181)*: Local councils would benefit from having a stronger mandate from central government as to the need for nature-based solutions on long-term infrastructure such as solar panels or green roofs on bus stop infrastructure and public bike-parking.
140. **Focus Area Two**

- 141.** Cities face massive issues with congestion, and electric vehicles don't reduce congestion - only public transport and active modes do.
- 142.** The promotion of electric cars and hybrid cars should not overshadow the need for mode shift. There is a risk that this will support New Zealand's current complacency to reduce dependency on private vehicles. While car travel is viewed as the preferred transport mode, the investment into public transport will be wasted if it is not the most convenient, preferred option for certain journeys (e.g., work commute).
- 143.** Focus on inclusivity and affordability is critical and it's good that the ERP references that. However, the reality for most low-income earners is that a subsidy will not make an EV affordable. Subsequently, if congestions charging is in place, it is then adding another cost of using a private vehicle to the low-income earners (pg.184). There needs to be more balance to support those on lower incomes to buy electric cars with support for purchasing e-bikes, initiatives to support EV Car Share Schemes, and more funds directed to towards providing more convenient PT school routes, as well as permanent PT fare decreases or free PT for school children and low-income households (and the promotion of this option to shift behaviour).
- 144.** Whilst mode shift is a key priority for Hamilton, we acknowledge the key role of EVs in the transition. An Auckland study showed that EVs are critical to fast adoption of low carbon transport. There needs to be a good range of public charging stations, such as close to where people work. Many people will continue to use their own personal vehicles for travel and need to be encouraged to switch to EVs, knowing that the infrastructure is in place (particularly where it may be difficult to have a vehicle charged at home due to parking availability). We believe there should be more emphasis and clear funding mechanisms for EVs, including e-bikes and buses and well as cars.
- 145.** We support the need for an EV infrastructure work programme if we are to have adequate EV chargers and charging stations for the potential rapid uptake of EVs.
- 146.** We would like more guidance as to the infrastructure requirements and how to manage situations such as if an electric vehicle was to catch on fire in a suburban setting. We recognise while EV and Hybrid car fires are rare, they are very hard to fight, and lithium batteries can reignite for days after the initial fire may be extinguished. (pg.185)
- 147.** As well as modal shift and EVs, biofuel has an important role to play, particularly in the agricultural space. Tractors and farm machinery use large amounts of fuel due to the nature of work and alternatives are not readily available. A viable biofuel stream must be developed quickly and underpinned by feedstock providers and large transport businesses.
- 148.** Alongside the need for biofuels to reduce emission of current fleet, we also recognise that additional infrastructure is required for hydrogen vehicles if they become promoted (heavy vehicles) and see the promotion of biofuel for vehicles to be a more viable option than hydrogen as it makes use of current infrastructure. (pg.190)
- 149. Building and Construction**
- 150.** We recognise the structure and scope of this section as being clearly defined and have recommended that in future a similar approach to drafting and elaborating on the other sections of the ERP be undertaken. The section defines the targets and emission caps clearly and lays out clear actions that can be easily linked back to their carbon reduction impact in the subsector targets.
- 151.** Setting high energy efficiency design standards for buildings would minimise the energy required in operating them. Although we support the need for this, it is not a step which is mandated by councils and there is always risk that energy inefficient building are constructed due to insufficient budget.

**152. Waste**

**153.** The ERP notes that all municipal (Class 1) landfills are required to capture gas by the end of 2026. However, the ERP does not clarify if this includes closed landfills.

## Further Information and Hearing

**154.** Should Parliament' Environment Committee require clarification of the submission from Hamilton City Council, or additional information, please contact **Cathy Kopeke** (Sustainability and Climate Change Senior Advisor) on 07 838 6419 or email [cathy.kopeke@hcc.govt.nz](mailto:cathy.kopeke@hcc.govt.nz) in the first instance.

**155.** Hamilton City Council **does wish to speak** in support of this submission at the Environment Committee hearings.

Yours faithfully



**Lance Vervoort**  
**CHIEF EXECUTIVE**



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