

Living Streets Aotearoa



Living Streets Aotearoa Submission Guide: NZ Government's Emissions Reduction Plan discussion document

Introduction

The Government has released its Emissions Reduction Plan (ERP) discussion document, which sets out its plans for making emissions reductions between now and 2035 and calls for help in making these plans stronger. Submissions close on 24 November and you can make them here:

<https://environment.govt.nz/publications/emissions-reduction-plan-discussion-document/>

Government sources tell us that this submission process represents a genuine chance to influence emissions reductions policy before the final plan is released in 2022, and we think it's worthwhile making a submission.

The document introduces four transport targets:

1. reduce vehicle kilometres travelled (VKT) by cars and light vehicles by 20 per cent by 2035 through providing better travel options, particularly in our largest cities
2. increase zero-emissions vehicles to 30 per cent of the light fleet by 2035
3. reduce emissions from freight transport by 25 per cent by 2035
4. reduce the emissions intensity of transport fuel by 15 per cent by 2035.

The submission points below mainly relate to the first of these targets, which is the most relevant to walking. But we encourage you to read the whole document and submit on the other proposals as well. We think the Government should go further and act faster to encourage walking and transport choice in general. We also think that there's plenty to support in the transport section of this document – and that it's worth saying so.

Suggested submission points

These relate to Question 52 in the consultation document

Do you support the target to reduce VKT by cars and light vehicles by 20 per cent by 2035 through providing better travel options, particularly in our largest cities, and associated actions?

Principal submission points

We propose a stronger target: at least a 20% reduction in VKT by 2030, and at least a 30% reduction by 2035. Our proposed 2030 target is consistent with the “high” VKT reduction pathway in the Ministry of Transport’s own modelling. Given the climate emergency, we would like to see even more ambition.

We support the proposed development of a separate walking strategy during the first budget period. This strategy must be co-designed from the start with pedestrians and disabled persons’ representatives, and must draw on the latest evidence about walking from Aotearoa and abroad.

We support the provision of substantially increased funding for walking and cycling improvements. We recommend that the Government follow the Irish example: allocate 10% of the total transport capital budget for pedestrian infrastructure, and a further separate 10% for cycling projects.

We propose nationally adopting the sustainable transport hierarchy that puts parked cars at the bottom of the priority list, so that parking should never get in the way of providing safe footpaths for pedestrians or safe lanes for bike and micromobility riders, keeping them safe and pedestrians safe.

We support reviewing and enhancing mode shift plans for the six largest urban centres, and the measures proposed. Right now, our streets are dominated by cars, and that means everything else tends to end up on the footpath, making life difficult for all pedestrians including people with disabilities. More people will choose to walk if we make footpaths safer and less cluttered. We recommend:

- investment in safe footpaths for people on foot and disabled users of low-speed mobility devices
- investment in safe, separated lanes for bikes, e-bikes and e-scooters and other micromobility devices
- more emphasis on the co-design and development of low traffic neighbourhoods
- a strong emphasis on integrating walking with better public transport and mass transit

However, with so much emphasis on the six main centres, we’re concerned that the opportunities for mode shift in rural and provincial areas will be overlooked. We want the Government to act more urgently to investigate, promote and enable walking, public transport and cycling in rural and provincial centres – including travel between centres.

We support using congestion pricing and other road pricing mechanisms throughout Aotearoa. In designing and implementing these, a just transition approach to revenue recycling needs to be taken to ensure that transport choice is enhanced and transport poverty reduced.

We agree the Government should support local governments to speed up road reallocation to support walking, public transport, cycling and placemaking, and the proposed measures. The current system makes it unnecessarily time-consuming to take such measures. We need

a system that allows innovation, such as those that were provided by COVID lockdowns, to be rapidly and effectively taken.

Additional submission points

We want the Government to take an integrated emissions reduction approach to the entire transport network. Many of the proposals in the draft plan are excellent, but they have to work together, not get stuck in silos.

While retaining community input, we want the Government to reduce regulatory and legislative barriers that make it difficult for local governments to implement transport emissions reductions.

We want the Government to enable and empower iwi and local communities to be able to take effective transport emissions reductions measures appropriate to their rohe and regions.

In implementing its emissions reduction plans, it's critical that the Government incorporate and build on the health and well-being benefits walking brings. Sitting in an electric car is still sitting in a car. Standing on an e-scooter offers very little of the exercise benefit obtained from walking. By encouraging walking and cycling, we can not only reduce emissions, but improve public and personal health.

It's time to remove tax incentives that encourage transport emissions. In particular, the current Fringe Benefit Tax (FBT) regime creates perverse incentives. An employee subsidy for annual public transport use or purchase of an electric bicycle is subject to FBT, but the provision of a carpark to staff is not. This undercuts the Government's target to increase use of low carbon modes such as walking, cycling and using public transport. These perverse incentives should be removed.

We support the commitment to ensure that further investments that expand roads and highways are consistent with climate change targets, and avoid inducing further travel by private motorised vehicles.

We agree with the proposals to make school travel greener and healthier. Providing safe, effective and attractive walking, cycling and public transport connections to educational facilities and other community facilities should be a key factor in whether new housing developments, especially greenfields developments, receive resource consent.

We support the proposed measures to improve access and travel choice for the transport disadvantaged, and the importance of developing these during the first budget period. Better provision for walking should be a key part of this.

Background to this process

In March 2021, LSA submitted on the Climate Change Commission's draft advice to the

Government, highlighting the role of walking as a low-carbon form of transport and a contributor to a decarbonised, people-centred transport system. The CCC's draft advice was very focused on replacing internal combustion engine cars with electric cars, so we were encouraged that their final advice went some way to acknowledge the importance of promoting transport choice, including walking provision.

We also submitted on the Ministry of Transport's Hīkina te Kohupara emissions reduction discussion document. The MoT saw a much stronger role for walking, cycling and public transport in decarbonising transport, and we were broadly supportive of their approach, though calling for more to be done sooner.

Now we're on the third leg of the trifecta. The Government has released its Emissions Reduction Plan discussion document, and it falls somewhere in between the CCC's and Ministry's approaches. Two key policy proposals for walking in it are a reduction in vehicle kilometres travelled (VKT) by 20 per cent by 2035 through providing better travel options, and the development of separate walking and cycling strategies by 2025 to help reduce emissions.

Based on analysis of the MOT's research underpinning their 20 per cent target, we think more can be done sooner. In a climate crisis, we can't afford to wait around for the light or heavy vehicle fleets to be substantially decarbonised. That must happen, but we need to go early and go hard on transport emissions reductions through walking, cycling and public transport. (**Note:** A 20% reduction by 2030 is consistent with the "high" VKT reduction assumption in the Ministry of Transport's own modelling of how the VKT target could be achieved.)

About Living Streets Aotearoa

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking-friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.