

Ministry for the Environment

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By email: ZCB.Submissions@mfe.govt.nz

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Living Streets Aotearoa thanks the Ministry for the Environment and the Coalition Government for the opportunity to submit on the Zero Carbon Bill.

Living Streets Aotearoa is the New Zealand organisation for people on foot, promoting walking-friendly communities. We are a nationwide organisation with local branches and affiliates throughout New Zealand.

We want more people walking and enjoying public spaces be they young or old, fast or slow, whether walking, sitting, commuting, shopping, between appointments, or out on the streets for exercise, for leisure or for pleasure. We include people using wheelchairs, prams and pushchairs in our definition of walking.

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.

Organisation details

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Submitter type: NGO



General Comments

Living Streets Aotearoa considers the Zero Carbon Act is a most important piece of legislation and must take priority in the Government's work in all areas.

2050 target

1. What process should the Government use to set a new emissions reduction target in legislation?

The Government sets a 2050 target in legislation now

2. If the Government sets a 2050 target now, which is the best target for New Zealand?

Net zero carbon dioxide: Reducing net carbon dioxide emissions to zero by 2050

Earlier compliance would be even better.

3. How should New Zealand meet its targets?

Domestic emissions reductions only (including from new forest planting)

Co-benefits will not be realised by purchasing overseas units.

4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?

No.

There should not be weakening of targets without 75% majority of the House of Representatives. To ensure ongoing multi-partisan support it may be necessary to only allow increasingly stringent targets with the same super-majority.

Emissions budgets

5. The Government proposes that three emissions budgets of five years each (ie, covering the next 15 years) be in place at any given time. Do you agree with this proposal?

Yes



It's essential to have a view of several budgets ahead, especially while "low-hanging fruit" is picked first it must be manageable to reach the next, tougher, targets. Setting targets too mild to start with will make it very tough to achieve necessary reductions in later decades. Public infrastructure and business investment, town planning and transport pricing all need a significant policy horizon if we want real change.

Setting five year targets decouples targets from both local and central government elections which is important if the commitment is truly multi-partisan.

6. Should the Government be able to alter the last emissions budget (ie, furthest into the future)?

Pick one:

No, emissions budgets should not be able to be changed.

Optional comment

7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under [exceptional circumstances](#)?

No.

There should not be weakening of targets without 75% majority of the House of Representatives. A significant disaster such as a major earthquake, may slow progress but many earthquake issues will only be exacerbated by Climate Change such as sea level rise and increased extreme rainfall events will worsen liquefaction so softening targets temporarily should be a last resort. It may be necessary to tighten targets if scientific predictions continue to worsen. Again, a supermajority of Parliamentarians should be necessary to change targets so it's imperative to set the right ones at the beginning.

8. Do you agree with the [considerations](#) we propose that the Government and the Climate Change Commission take into account when advising on and setting budgets?

Not completely.

The physics of climate change must come first for setting Emissions Budgets, making sure ecological tipping points are not breached. As the impacts of unmitigated climate change will be highly regressive on New Zealanders the priority must be robust emissions budgets. The Climate Commission's Emissions Budgets must be consistent with the best

possible chance of limiting global warming to 1.5°C degrees and the greater responsibility of well-resourced nations like NZ, with Budget considerations limited to:

- A. Scientific knowledge about climate change, sea level rise and ocean acidification
- B. Obligations under Te Tiriti o Waitangi
- C. Global leadership, particularly in the Pacific.

The Commission then advises the Government on mitigation policies (including ETS settings) for the Government plans to keep NZ's future emissions within the Commission's budgets.

Government response

9. Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?

Yes

Given the number of existing reports such as from the Parliamentary Commissioner of the Environment, the Productivity Commission and the IPCC reports, a target should be set within six months of the October 2018 IPCC report i.e. by April 2019.

10. What are the most important issues for the Government to consider in setting plans to meet budgets? For example, who do we need to work with, what else needs to be considered?

Comment

Cross Government approach

All parts of Government must work together, including elected members within Cabinet and outside, from the Coalition Government and parties outside Government. Different Ministries and Agencies must make common cause on this generational issue.

The Ministries of Housing, Education, Health, Transport, MFAT, MBIE and Primary Industries all have a role to play, as do Crown agencies. For almost every issue: global security, refugees, public health, mouldy homes, disaster recovery, agriculture and forestry, climate change will have a negative impact.

Increasingly extreme weather will certainly impact on the desirability of walking for utility or leisure.



Multi sectoral approach essential

We submit that all contributing sectors should reduce emissions and sequester carbon where possible. We agree that agriculture, forestry, energy generation, water management, waste management and manufacturing all have a part to play.

Living Streets Aotearoa’s submission will focus on transport and urban development as our areas of capability and expertise and major short and long term contributors to climate change escalation or mitigation.

We submit that almost all organisations (business, state owned enterprises, Councils and NGOs), households, habitats and individual humans and other species will be affected by climate change and need to be considered in responses. However there must be swift action rather than excessive consultation delay. Fortunately the vast majority recognise climate reality.

New Zealand’s Tiriti of Waitangi as a foundation document mandates iwi involvement at a leadership level as well as effectively demanding that there is an equitable response to people impacted by higher fuel costs, for example.

Connect strongly with Local Government

Local government leaders are strongly supportive of climate change mitigation and adaptation but need central government support and scientific support to address the most pressing rather than the easiest options. Amendment to the Local Government Act 2002 to give specific responsibility to address climate change mitigation and adaptation would be helpful. Possibly requiring all Councils above a certain size to measure their emissions and create plans for their reduction would be wise. Several Councils, including Wellington, Kāpiti and Masterton already use CEMARS.

“In 2015, Mayors and Chairs of New Zealand declared an urgent need for responsive leadership and a holistic approach to climate change. We, the Mayors and Chairs of 2017, wholeheartedly support that call for action. Climate change presents significant opportunities, challenges and risks to communities throughout the world and in New Zealand. Local and regional government undertakes a wide range of activities that will be impacted by climate change and provides infrastructure and services useful in reducing greenhouse gas emissions and enhancing resilience”¹.

Maximise co-benefits rather than always looking for the lowest-cost strategy. For example, this is recognised in the UK Clean Growth Strategy.

“In addition to supporting innovation, we are focused on policies that deliver social and economic benefits beyond the imperative to reduce emissions. Higher quality, more energy efficient buildings are healthier places to live and work. Reducing the amount of heat we waste will reduce bills. Accelerating the rollout of low emission vehicles contains a triple win for the UK in terms of industrial opportunity, cleaner air and lower greenhouse gas emissions. And crucially, many



of the actions in the Clean Growth Strategy will enhance the UK's energy security by delivering a more diverse and reliable energy mix.”²

Transport and Urban Development

Emissions from road transport continue to rise. Data from the Ministry of Transport³ shows 13, 282 kt of CO₂-e in 2015, up from 12, 815 kt the previous year. The new Government Policy Statement is a step in the right direction but there must be more support for shifting mode share. A focus on the highly-polluting short journey would be a good start. One third of car journeys are under 2km, an ideal distance for walking.⁴ Currently only 38% of journeys under 2km are walked, ranging from a low of 25% on the West Coast to a high of 47% in the Wellington region (2010-2014 data)⁵

More people walking for short journeys will decrease emissions disproportionately as emissions (greenhouse gases and particulates) are higher per km for a cold start⁶. Co-benefits include better physical and mental health, less congestion (e.g. at school gates, railway stations, shopping centres), better economic outcomes for retailers including cafés.

We suggest that the Land Transport Management Act 2003 is revised to give the New Zealand Transport Agency a strong mandate on reducing greenhouse emissions in accordance with the five-yearly Carbon Budgets. We would also like to see regular, three-yearly or annual updates to the Pedestrian Profile issued so progress can be measured. Cost-benefit analysis should include the costs of delay to pedestrians⁷.

Urban development that focusses medium density housing near to jobs and facilities will make a long-term difference to emissions and health. Urban sprawl has a permanent effect on people's travel choices. Given the current coalition's determination to address the affordable housing shortage, we insist that the opportunity to build in the right place is as important to equity as the cost of the home to buy or rent. Otherwise initially cheaper land or housing costs are offset for decades

¹ <http://www.lgnz.co.nz/assets/Uploads/Climate-Change-Declaration-Final.pdf>

² <https://www.gov.uk/government/publications/clean-growth-strategy/clean-growth-strategy-executive-summary>

³ <https://www.transport.govt.nz/resources/tmif/environmental/ei001/> **Optional comment**

⁴ <https://www.nzta.govt.nz/assets/resources/travel-planning-toolkit/docs/resource-1-facts-and-figures.pdf>

⁵ <https://www.transport.govt.nz/resources/tmif/travelpatterns/tp009/>

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http://infocouncil.aucklandcouncil.govt.nz/Open/2017/08/CEN_20170823_AGN_7016_AT_files/CEN_20170823_AGN_7016_AT_Attachment_55166_1.PDF



by increased transport and health costs, borne by generations to come. The Resource Management Act

Climate Change Commission

11. The Government has proposed that the Climate Change Commission [advises on and monitors](#) New Zealand’s progress towards its goals. Do you agree with these functions?

Yes

Living Streets Aotearoa supports the Climate Change Commission having two functions: (a) providing expert advice, and (b) monitoring our progress and holding the Government to account.

We support Generation Zero in saying that the Commission should not be a decision-making body, for the following reasons:

- Democratic accountability: Elected officials should be ultimately responsible for making plans and meeting Zero Carbon Act targets. The Commission is not democratically elected or accountable to the public.
- Compromised watchdog: A Commission with decision-making powers would have a conflict of interest in holding itself to account over its own policy decisions.
- Comprehensive policy plans: Transitioning to a zero carbon economy will require coordinated policies across all sectors of the economy. Delegating some decision-making powers to the Commission (such as ETS settings) risks these policies being made without properly coordinating with policies elsewhere.

Monitoring will only be possible if organisations above a certain size certify their emissions profile e.g. by CEMARs. Internationally valid monitoring is essential.

12. What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?

Advising the Government on policy settings in the NZ ETS.

As above.



13. The Government has proposed that Climate Change Commissioners need to have a range of [essential and desirable expertise](#). Do you agree with the proposed expertise?

Yes

Consider diversity of background, gender and race as well as knowledge so there is a high-functioning and innovative group. Communications skills will be essential and can be provided by an effective secretariat.

Adapting to the impacts of climate change

14. Do you think the Zero Carbon Bill should cover adapting to climate change?

Yes

Separate commissioners and workstreams may be necessary so as not to dilute focus on mitigation – although some actions can both mitigate and adapt.

15. The Government has proposed a number of new [functions](#) to help us adapt to climate change. Do you agree with the proposed functions?

Yes

16. Should we explore setting up a targeted adaptation reporting power that could see some organisations share information on their exposure to climate change risks?

yes

To create a resilient country, adaptation to climate change – public health, biodiversity, flooding, sea level rise and other issues must be combined with other potential shocks and stresses including earthquakes, tsunami and social deprivation. Often consideration of combined risks will come up with a similar answer but not always.

One example of co-benefits in resilience is the much awaited section of the Great Harbour Way from Petone to Ngauranga that will also protect the rail line from storm surges. Other co-benefits include sustainable tourism, new sporting events and healthier commuting.



Working with the NZ Insurance Council and infrastructure investment companies such as Infratil will be important.

Acknowledgements

Generation Zero for publicising and initiating the Zero Carbon Bill.

Ora Taiao New Zealand Climate and Health Council for leadership.

The Productivity Commission for their report on the UK Climate Change Act.

<https://www.productivity.govt.nz/sites/default/files/Examining%20the%20UK%20Climate%20Change%20Act%202008.pdf>

Dr Jan Wright, previous Parliamentary Commissioner for the Environment for her report

Stepping stones to Paris and beyond: Climate change, progress, and predictability.

<https://www.pce.parliament.nz/publications/stepping-stones-to-paris-and-beyond-climate-change-progress-and-predictability>

Hon Simon Upton, current Parliamentary Commissioner for the Environment for his report

Zero Carbon Act for New Zealand: Revisiting Stepping stones to Paris and beyond

<https://www.pce.parliament.nz/media/196427/zero-carbon-act-for-nz-web.pdf>

References

Ministry of Transport Indicators 2018

<https://www.transport.govt.nz/resources/tmif/allindicatorsbynumber/>

UK Clean Growth Strategy 2017

<https://www.gov.uk/government/publications/clean-growth-strategy/clean-growth-strategy-executive-summary>

The Business Case for Walking 2017

http://infocouncil.aucklandcouncil.govt.nz/Open/2017/08/CEN_20170823_AGN_7016_AT_files/CEN_20170823_AGN_7016_AT_Attachment_55166_1.PDF

NZTA Pedestrian Profile 2000



<https://www.nzta.govt.nz/assets/resources/nz-pedestrian-profile/docs/nz-pedestrian-profile.pdf>

Modal share comparisons

https://en.wikipedia.org/wiki/Modal_share#Cities_with_over_1,000,000_inhabitants

Cold start emissions 2005

<https://hal.archives-ouvertes.fr/hal-00917071/document>

Jean-Marc André, Robert Joumard. Modelling of cold start excess emissions for passenger cars.

Modelling of cold start excess emissions for passenger cars

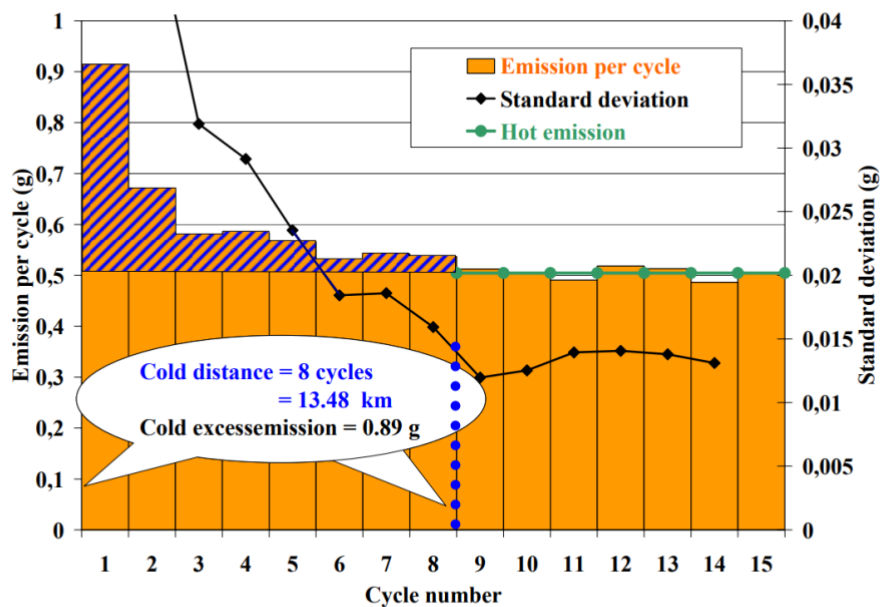


Figure 4: Standard deviation method: Example of cold start distance and emission calculation for Euro 1 diesel vehicle and CO at 18°C. The distance is in km and the emission in g per cycle.

