

Living Streets Aotearoa



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

Introduction

Living Streets Aotearoa, the national walking and pedestrian advocacy organisation, is pleased to see an emphasis on walking in the Emissions Reduction Plan discussion document; Transport chapter, and supports many of the measures proposed.

However, given the scale of the climate emergency, the crucial importance of making sharp emissions reductions in the first two budget periods (2022-2030), and the ease with which walking improvements can be made, we submit that more investment in walking improvements can help bring transport emissions down faster, while also contributing to transport choice, equity and well-being.

Electric cars clearly have an important role to play in uses for which cars are needed. However, the difficulty of rapidly converting the light vehicle fleet from ICEs to EVs; concerns over the feasibility, environmental and embedded emissions effects of a massive increase in battery production for electric cars; and the major health co-benefits of walking all contribute to our view that investing in walking, public transport and other active modes will be the major contributor to land transport emissions reductions in the critical first two budget periods, and will continue to be major contributors beyond that.

We have previously submitted along these lines in response to the Climate Change Commission's draft recommendations and in response to the Ministry of Transport's Hīkina te Kohupara emissions reduction discussion document.

The Emissions Reduction Plan discussion 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, and are therefore framed as answers to **Question 52**:

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?

Targets

We propose stronger VKT reduction targets: 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, supplied to us on request. Given the climate emergency, we would like to see even more ambition.

We propose a target to increase walk mode share. A target is required to focus on what we want (ie more walking) rather than just what we don’t want (ie car use measured by VKT). This should start with a review of New Zealand data collected on walking and pedestrians with urgent work to rectify the data knowledge gaps and inconsistencies with measurement of other travel modes. We propose that this target should be to increase the proportion of walking trips in each local authority area to at least 25% of all trips by 2030 in urban areas, and by 2035 in rural and provincial areas.

We note that OraTaiao: NZ Climate and Health Council has called for a minimum of an absolute increase of 10% in each active mode or a doubling of walking and cycling mode share - whichever is larger - in all urban areas with a population over 10,000 by 2030. With regards to walking, we support this call and stress the importance of improving links between walking and public transport.

Strategies

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. Before this walking strategy is developed, we must not take any actions that would put walking at risk of decline. For that reason, we recommend that some of the proposals in the Accessible Streets Package be reviewed as they directly threaten the safety and comfort of pedestrians, factors well-known to influence the willingness of people to walk.

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. The wellbeing framework approach proposed by the OECD provides an integrated approach to transport systems redesign for reduced emissions.

Funding

We support the provision of substantially increased and separate funding for walking improvements, and for public transport. 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 support the intention to link funding to clear objectives and criteria, and would expect these to include meeting best practice pedestrian guidance.

Mode shift plans

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 pedestrians
- a strong emphasis on integrating walking with better public transport and mass transit
- 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

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 would like to be involved in the further development of the mode shift plans for the six largest urban centres.

Sustainable transport hierarchy

We propose adoption of the internationally recognised sustainable transport hierarchy with walking and pedestrians as the priority. This is particularly important as transport becomes more linked with planning for urban affordable development. 'Walkable' catchments are more than just a 10 or 15 minute walk by able bodied adults, they must be walkable for all age groups and abilities. This will include provision of dedicated footpaths for pedestrians of a suitable width meeting best practice in design, construction and maintenance, as well as priority when crossing. And it will include comfortable public places for the community to meet, sit and interact with a minimum of green space.

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 dedicated footpaths for pedestrians or safe lanes for bike and micromobility riders, keeping them safe and pedestrians safe.

Other measures

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 regulatory 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.

Improving access to public transport is crucial, both due to how public transport and walking complement each other, and for its own sake. We recommend investigation of a range of methods to increase public transport patronage, including providing free or reduced fares to people with less transport choice, and changing fare structures (e.g. from sector-based to time-based fares in rural districts). Improving the frequency and reliability of public transport services, including inter-city rail and bus services, is also important.

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 active travel. By encouraging walking we can not only reduce emissions, but improve public and personal health and reduce air pollution.

It's time to remove tax incentives that encourage transport emissions. In particular, the current Fringe Benefit Tax (FBT) regime creates perverse incentives. 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 particularly for primary students, together with public transport connections to educational facilities is essential to reverse the decline in walking to school. Funding for walking school buses for younger children is required, and for safety improvements for walking around secondary schools. Weekend student travel to sports and cultural activities 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 pedestrians should be a key part of this.

Other measures that would assist an increase in walk mode share are to promote walking nationally and through national education campaigns about the impact of footpath parking on children and the disabled, a focus on education on drivers following the Road Rules that support safe walking, national educational support for the use of public transport. There is a silence on the benefits of both PT and walking at a national level.

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.