

Submission  
on

‘Hīkina te Kohupara - Kia mauri ora ai te iwi -  
Transport Emissions:  
Pathways to Net Zero by 2050’



22 June 2021

Tēnā koe,

We would like to congratulate the Ministry of Transport on the development of Hīkina te Kohupara. Many of the ideas and messages strongly align with the kaupapa of OraTaiao – the New Zealand Climate and Health Council.

We would like to make six key points:

- The Ministry of Transport as steward of the transport system has well-defined outcome goals. Two of which are closely interrelated – Health and the Environment. The health and wellbeing co-benefits of climate change mitigation strategies that increase active and public transport are well documented. These co-benefits need to be elevated within Hīkina te Kohupara to become a central focus of the transport system transformation. The healthcare sector is highly carbon intensive (the largest public sector emitter of greenhouse gases) and is actively trying to reduce its footprint. One of the most effective tools to reduce healthcare emissions is by reducing healthcare demand. This can be effectively achieved by moving from health harming transport modalities to health improving transport such as active and public transport.
- The document does not do enough to honour te Tiriti. It calls for *consultation* with Māori/Iwi when development of key transport initiatives should involve true *partnership* relationships. Partnership with iwi/Māori should become one of the key principles in Hīkina te Kohupara.
- We support pathway 4. It is most likely to meet the targets for greenhouse gas reductions specified in the Climate Change Commission's advice to government, will help realise the health co-benefits of increased active and public transport, will make our cities more livable, will reduce the expensive requirement to massively expand renewable energy generation, will enhance equity of access to transport and is achievable with currently available technology. However, given the Government's declaration of a climate emergency, and the need for early and aggressive emissions reductions to limit warming to 1.5 degrees Celsius, we think the ambition needs to be ratcheted up significantly. All timeframes for the transition to active and electrified public transport need to be reviewed and brought forward.
- The lack of inclusion of embodied emissions in transport infrastructure and other lifecycle impacts in this work is a limitation. All emissions need to be considered in decision-making for policies and projects. In particular, the cost and embodied carbon in new renewable electricity generation infrastructure to meet the demands of more electric vehicles needs to be included when comparing with alternatives such as public and active transport.
- Many important transport system health-impacts (e.g. injury, air pollution related mortality, community severance, social exclusion) are inequitably distributed. Lack of full consideration of these inequities in a transition may lead to them worsening. We feel the document does not go nearly far enough in incorporating the needs of hitherto sidelined groups like children, elderly people, and disabled people. We recommend that it is clearly expressed that disabled people are properly represented at all levels of transport planning.

- Hīkina te Kohupara has many good ideas but lacks a clear vision for the transport system. A good example of such a vision (although for a subset of the transport network) can be found in the United Kingdom’s recently released document “Gear Change – A bold vision for cycling and walking”. The vision simply states: “England will be a great walking and cycling nation”. We recommend the Ministry of Transport develops a clear vision for the transformation of transportation in Aotearoa.

Other points related to the consultation questions:

### **Consultation question 1**

**Do you support the principles in Hīkina te Kohupara? Are there any other considerations that should be reflected in the principles?**

**Pg. 11. Principle 5:** This single principle should be split into three, positively-framed principles. The first should clearly state that transport system transformation should achieve co-benefits to health, wellbeing and livability of cities. The second should address a just transition and enhanced equity of access to transport. The third should articulate a *partnership* relationship with iwi/Māori in the development of transport initiatives.

### **Consultation question 2**

**Is the government’s role in reducing transport emissions clear? Are there other levers the government could use to reduce transport emissions?**

**Pg. 22. Collaboration within the Transport System:** This section mentions that Government has a responsibility to have a meaningful partnership relationship with Māori. As per consultation question 1, we believe this should be one of the key principles that shapes advice to the Government.

**Pg. 23. Planning system and Housing and Urban Development:** Currently, new greenfield site developments are not required to include 3<sup>rd</sup> speed (separated cycle path) facilities. From the outset this infrastructure should be included alongside roads, footpaths, and a plan for public transport. It is easier to include these at the outset rather than retrofit them into existing urban and suburban spaces.

**Pg. 24. Investment:** The National Land Transport Fund will not be able to meet the funding requirements to decarbonize the transport system as outlined in this section. Subsidies under the ETS for emissions intensive trade exposed (EITE) industries should be scrapped and used to directly fund low-emission transport infrastructure.

**Pg. 25. Economic and educational tools to influence behavior:** Public health expertise has an important role here. We have advocated for this expertise to be included on the Climate Change Commission. Public health experts understand what drives behavior change (see the success of tobacco control). Education will only play a limited role; regulation and pricing will have more important roles to play. At the end of the day, people will change behavior if the alternative (active and public transport) is faster, cheaper, easier, and safer than the status quo (cars). This will require

building infrastructure for public and active transport, making it affordable, and making driving cars slower and more expensive to use (through congestion charges, quiet streets, speed limit changes, fuel taxes etc.)

### Consultation question 3

**What more should Government do to encourage and support transport innovation that supports emissions reductions?**

**Pg. 31. Government has a role in supporting transport innovation:** Two key areas of recent innovation that deserve more emphasis and focus as potential major disruptors are electric bikes and working from home. Electric bikes, in particular, have the ability to reduce emissions with the co-benefits of improved health and wellbeing. Electric bikes also have the potential to address equity and cost concerns about electric vehicles. They should both be a focus of Government support for ongoing innovation.

### Consultation question 4

**Do you think we have listed the most important actions the government could take to better integrate transport, land use and urban development to reduce transport emissions? Which of these possible actions do you think should be prioritised?**

**Pg. 35. Key points:** In the key points section of “changing the way we travel” improving cycling infrastructure is mentioned. Currently much infrastructure is under-utilised due to poor design. The Ministry of Transport needs to develop best practice guidelines for cycle infrastructure with co-funding for development contingent on meeting these standards. No mention of fare prices is made under ‘supporting public transport’. Strong consideration should be given to no, or flat, low-rate fares for public transport. We recommend that it be clearly outlined that the needs of disabled people are incorporated into all levels of planning, design and integration, and that disabled people are represented appropriately at every stage in the process.

**Pg. 42. Reshaping streets to support public transport, active modes, and placemaking could potentially be done swiftly and cost-effectively:** We 100% support the notion that this is the most effective and affordable way to rapidly reduce emissions with significant additional co-benefits.

### Consultation question 5

**Are there other travel options that should be considered to encourage people to use alternative modes of transport? If so, what?**

**Pg. 46. Public transport provides co-benefits, including supporting the access of non-drivers:** As well as being described as attractive, safe and reliable it should also be both *affordable and accessible*. Low flat-rate fares, or no fares, will help increase uptake of public transport and also address transport equity.

Public transport becomes a more appealing and popular option when cars are less appealing. This can be achieved through reduced parking for cars, more traffic calming measures, increased price of parking, congestion charges, and road user charges.

The best method to protect cyclists is to create safe cycle infrastructure such as separated cycle lanes, to reduce speed limits, to reduce the number of cars on the road, and to increase traffic calming measures. Once this infrastructure is up and mode shift has occurred, a review of compulsory cycle helmet use should occur.

**Pg. 48. E-bikes are increasing the potential for cycling in Aotearoa:** E-bikes and e-scooters need to be kept separate from walkers and cars. Currently substandard infrastructure (such as shared paths) create safety issues. The Ministry of Transport should develop best practice guidelines for cycle infrastructure and co-funding should be contingent on meeting these best practice standards.

**Pg. 49. Taking a network approach is key to reducing emissions through walking and cycling:** Consideration should be given to changing the legal framework around financial liability for accidents involving cars and bikes/pedestrians (similar to the “strict liability” laws in the Netherlands).

**Pg. 54. Providing better travel options: possible key actions:** Agree with these key actions as outlined. In addition, as previously stated, The Ministry of Transport needs to develop best practice guidelines for cycle infrastructure with co-funding for development contingent on meeting these standards. An example of this is the document [“Gear Change – A bold vision for cycling and walking” by the Department for Transport UK.](#)

#### **Consultation question 6**

**Pricing is sometimes viewed as being controversial. However, international literature and experiences demonstrate it can play a role in changing behaviour. Do you have any views on the role demand management, and more specifically pricing, could play to help Aotearoa reach net zero by 2050?**

We strongly support pricing mechanisms as a tool to mode shift transport to public and active transport. Careful consideration needs to be given to the equity impacts of any pricing mechanism, especially the impact on the poor, those living in rural New Zealand, and small businesses who rely on transport modes, for which there are currently no viable alternatives.

#### **Consultation question 7**

**Improving our fleet and moving towards electric vehicles and the use of sustainable alternative fuels will be important for our transition. Are there other possible actions that could help Aotearoa transition its light and heavy fleets more quickly, and which actions should be prioritised?**

In addition to the measures mentioned consideration should be given to the following:

- A ban on marketing of large fuel inefficient SUV/utes

- Remove the fringe benefit tax exemption from utes, increase the sales tax and vehicle registration charges on large fuel inefficient SUV/utes
- Ensuring charging infrastructure serves rural and low-income communities. Widely distributed charging infrastructure will allow the purchase of more affordable, smaller-capacity battery electric vehicles.

### **Consultation question 8**

**Do you support these possible actions to decarbonise the public transport fleet? Do you think we should consider any other actions?**

**Pg. 75. Decarbonising the public transport fleet: possible key actions:** We endorse all the key actions outlined and strongly recommend setting a much earlier date for all public transport buses to be pure electric.

### **Consultation question 9**

**Do you support the possible actions to reduce domestic aviation emissions? Do you think there are other actions we should consider?**

Increase in demand for aviation is exceeding improvements in efficiency and sustainability. The key driver of reduced emissions in the short to medium term is not flying. Alternatives to flying should be the focus - e.g. videoconferencing for business meetings, conferences etc. Electric interregional rail and bus should be prioritised.

### **Consultation question 10**

**The freight supply chain is important to our domestic and international trade. Do you have any views on the feasibility of the possible actions in Aotearoa and which should be prioritised?**

**Pg. 86. Improving the efficiency of our overall freight supply chain: possible key actions:** We agree with all these actions. The best outcome would be to move freight to rail and coastal shipping; this would reduce emissions but also improve the safety of roads and improve health through less particulate and other diesel emissions particularly in urban areas.

### **Consultation question 11**

**Decarbonising our freight modes and fuels will be essential for our net zero future. Are there any actions you consider we have not included in the key actions for freight modes and fuels?**

Any cost analysis of investing in rail and coastal shipping must take into account the co-benefits of moving freight to these modes, such as improved road safety, reduced particulate emissions and noise as a result of reduced road freight. Currently, the options for decarbonising road freight are limited and so the focus should be on shifting freight to coastal shipping and electrified rail.

## Consultation question 12

**A Just Transition for all of Aotearoa will be important as we transition to net zero. Are there other impacts that we have not identified?**

Māori have suffered worse health outcomes as a result of lack of access to healthcare. Providing access to active and public transport not only addresses transport equity but also health equity. Co-design with iwi/Māori will be important to ensure they can access transport to meet their health needs.

**Pg. 102. There are opportunities to reduce transport disadvantages during the transition, particularly in urban areas:** We 100% support the points made in this section. Access to public transport should be enhanced for low-income communities on the outskirts of urban areas; this technology is available now, has low emissions, is affordable, reduces inequality and improves health. Public transport should be linked in with cycle and walking infrastructure. Fares should be low and flat-rate, or no fares at all.

**Pg. 102. People living in outer-urban and rural/remote areas are less likely to benefit during the initial phases of the transition:** Electric vehicle car share schemes should be investigated as an option for remote rural communities.

## Consultation question 13

**Given the four potential pathways identified in Hīkina te Kohupara, each of which require many levers and policies to be achieved, which pathway to you think Aotearoa should follow to reduce transport emissions?**

Pathway 4. This is the only pathway that will have significant health co-benefits and address equity. The technology is available now and it also meets the 2035 emissions reduction targets set by the Climate Change Commission. This pathway will also make our urban areas much safer and more livable with significantly less VKT and cars. The need to increase expensive (and environmentally damaging) renewable energy infrastructure is less for this pathway, another co-benefit. However, given the Government's declaration of a climate emergency, and the need for early and aggressive emissions reductions to limit warming to 1.5 degrees Celsius, we think the ambition needs to be ratcheted up significantly. All timeframes for the transition to active and electrified public transport need to be reviewed and brought forward.

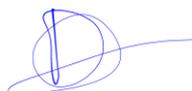
## Consultation question 14

**Do you have any views on the policies that we propose should be considered for the first emissions budget?**

We did not have time to conduct a thorough analysis of the policy tools outlined. We endorse the policies that support pathway 4 objectives.

Overall OraTaiao are encouraged that this document helps significantly to properly incorporate the principles of a healthy and just climate transition into the crucial area of transport. We feel it does not go far enough however. Strengthening the focus on wellbeing and justice and putting te Tiriti o Waitangi at the core of our transportation transformation will allow Aotearoa to develop a transportation system to be proud of. We at OraTaiao are always open to offer advice and to discuss this in more detail with the Ministry.

Nāku noa, nā



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## About OraTaiao

OraTaiao: The New Zealand Climate and Health Council is an organisation calling for urgent, fair, and Tiriti-based climate action in Aotearoa; we recognise the important co-benefits to health, well-being and fairness from strong and well-designed mitigative policies. We honour Māori aspirations, are committed to the principles of te Tiriti o Waitangi, and strive to reduce inequities between Māori and other New Zealanders. We are guided in our practice by the concepts of kaitiakitanga (guardianship), kotahitanga (unity), manaakitanga (caring), and whakatipuranga (future generations).

OraTaiao has grown over a decade to more than 700 health professionals concerned with:

- The negative impacts of climate change on health, well-being, and fairness;
- The gains to health, well-being, and fairness that are possible through strong, health-centred climate action;
- Highlighting the impacts of climate change on those who already experience disadvantage or ill-health (i.e., equity impacts);
- Reducing the health sector's contribution to climate change.

As well as individual members, we are backed by 19 of New Zealand's leading health professional organisations for our Health Professionals Joint Call to Action on Climate Change and Health (see [https://www.orataiao.org.nz/friends\\_and\\_supporters](https://www.orataiao.org.nz/friends_and_supporters)). This support includes the New Zealand Medical Association, the New Zealand Nurses Organisation and the Public Health Association, plus numerous specialist colleges. Together, these organisations represent tens of thousands of our country's health workforce.

As an organisational member of the Board of the Global Climate & Health Alliance, we work with a worldwide movement of health professionals and health organisations focused on the urgent

health challenges of climate change - and the health opportunities of climate action. OraTaiao signed the Doha Declaration on Climate, Health and Wellbeing of December 2012, which reflects this international perspective.