

24 June 2021

ESM0300/01/01  
2021 TMB

Transport Emissions  
Ministry of Transport  
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## HĪKINA TE KOHUPARA: HORIZONS REGIONAL TRANSPORT COMMITTEE SUBMISSION

Thank you for the opportunity to comment on Hikina te Kohupara.

This submission is made on behalf of the Horizons Regional Transport Committee (the Committee) which consists of representatives from:

- Horizons Regional Council;
- Horowhenua District Council;
- Manawatu District Council;
- Palmerston North City Council;
- Rangitikei District Council;
- Ruapehu District Council;
- Tararua District Council;
- Whanganui District Council; and
- Waka Kotahi New Zealand Transport Agency

The Committee also includes advisory members:

- Road Users representative
- NZ Police representative
- Road Transport Association representative
- Kiwi Rail representative
- Active / Public Transport representative

The Manawatū-Whanganui Region encompasses a broad area extending from south of Levin to north of Taumarunui and from Whanganui across to the east coast, approximately 22,000km<sup>2</sup> in total. It is a predominantly rural region with a few main centres of population. Because of its central location, the region has important land and air transport connections to the rest of New Zealand. Improving the environmental impact from land transport in our regional transport network is a key priority of our draft Regional Land Transport Plan (approved by the Committee on 1 June 2021) and a key focus for our region.

## SUPPORT FOR THE APPROACH; CONCERNS ABOUT SOME PRACTICALITIES

We commend the Ministry on a robust and thoughtful piece of analysis. The paper highlights the opportunities and difficulties of decarbonising transport — including the need for system-level change. We are pleased to see linkages outside the transport system considered.

On the whole, the Committee **supports** the principles and approach outlined in Hīkina te Kohupara. In particular, we support the avoid-shift-reduce strategy. As the paper notes, system-wide changes, with a focus on avoided travel and mode shift, have the potential not only to reduce greenhouse gas emissions but also to deliver substantial cobenefits in terms of

public health, safety, resilience, and social vibrancy. As local authorities, we are responsible for environmental, economic, social and cultural wellbeing: these are not separable. We see alignment of effort to deliver improvement on multiple fronts as being central to the success of our low-carbon transition – and to the future wellbeing of our communities.

There are inevitably some areas in which we have concerns and some aspects of the paper that we believe warrant greater weight. Long-term sustainability underpins the Ministry's approach: we would like to see this made explicit in Hīkina te Kohupara. Other comments largely relate to how Hīkina te Kohupara will work in practice. We draw your attention to our key submission points as follows:

***Orchestrating change:*** system-wide transformation at the necessary pace will be hugely resource intensive; we may not have the right tools to deliver it.

***Social mandate:*** a suite of tools will need to be employed to ensure the transition maintains public support and to avoid policy retrenchment in the future.

***Influencing industry:*** industry is a key partner in achieving change, but also needs to be provided with the right signals to change; resource management reform may help, but may be too slow and will only work if consumer preferences also shift.

***Rural communities and regional infrastructure:*** the paper has an urban focus; attention will need to be paid to equity and access issues outside the main centres.

***Public transport:*** funding, and the priority of decarbonisation relative to mode shift, are issues that require further attention.

***Energy supply:*** we are uncertain that assumptions about new generation capacity are realistic.

***Tangata whenua involvement:*** further consideration may be required of how government, central and local, can make it easy for tangata whenua to engage with us.

We expand on each of these themes below.

## ORCHESTRATING CHANGE

Hīkina te Kohupara notes the importance of levers outside the transport system (such as urban development and land use decisions) in delivering transformational change. It notes that there will be a need for greater investment from other sources, including the Crown and local government, and acknowledges that behaviour change will be crucial.

For the Ministry's strategy to be successful, we suggest that considerable resource will need to be devoted to orchestrating change. Changing urban form, or achieving mode shift, for example require coordination of effort across multiple areas of policy, multiple funding streams, and multiple agencies. This challenge should not be underestimated.

The first emissions budget period coincides with massive change in the local government / resource management sector, on which measures to avoid transport emissions rely. The Resource Management Act is to be replaced; new spatial planning and climate adaptation laws are proposed. The three waters sector is being reformed. There are deadlines for freshwater and urban development planning processes to be completed. Local Government itself is under review. At the same time, there is pressure to deal with a housing crisis. A near-perfect storm, this presents both an opportunity and a risk. The opportunity, with so much of the institutional and policy framework up for review, is to make a genuine step change in our ability to deliver better outcomes. The risk is that the number of priorities and sheer volume of work overwhelms capacity. The policy and implementation effort – to realise the opportunity of system-level alignment while avoiding the risk of dropped balls and unintended consequences – is daunting.

There is no easy solution to this challenge. We would, however, note that streamlining of bureaucratic process would help. Local government is often required to consult on action mandated by central government. Public involvement in decision making is important where there are genuine choices; where the impact of consultation on decisions is small, cost, time, and potential for relitigation may outweigh the benefits. If central government wishes to see extensive cycle networks as a matter of policy, for example, it should provide a mechanism for councils to establish them with a minimum of fuss. If local government is to contribute to a rapid transformation of urban landscapes and transport infrastructure, we will require genuine partnership with central government and more flexible, outcome-oriented tools with less (repeated) contestation.

## SOCIAL MANDATE

The paper acknowledges that public support is an important part of this transformation, but largely as an aside. It would benefit from a clearer focus on how such support (a 'social mandate') is to be built and maintained. Denser urban environments, and multiple disincentives to the use of private motor vehicles, will directly affect people's day-to-day lives and challenge assumptions about home and lifestyle. We need to encourage multi-modal street design and to tip the balance away from the automobile — but there need to be attractive alternatives, not just efficiency losses to individuals and businesses. To be successful, Hīkina te Kohupara requires behaviour change and a shift in values. If all sectors (or at least a strong majority) of society are not won over, and the change isn't made as easy as possible, there is a risk of political backlash and of measures being rolled back by future governments.

We agree with the Ministry that clear communication and consistency of direction are essential. This will apply across government departments and over time — though, of course, we also need to acknowledge that details are untested and adjustments in course may be necessary.

It will also be important for Government to be seen to 'walk the talk'. The Government's commitment to a carbon-neutral public sector by 2025 is an important step in this direction. Initiatives to achieve carbon neutrality in the public sector should be integrated with society-wide transformation flowing from Hīkina te Kohupara. Efficiency of service delivery should not, for example, impose additional travel or cost (or emissions) on communities engaging with those services.

Just as incentives should complement disincentives, public 'education' must go hand in hand with efforts to understand barriers to change. Sequencing will be crucial to ensure that there are attractive and practical options available to individuals, especially if disincentives are to form part of the policy mix.

If pricing is used, we **recommend** that consideration be given to how revenue is collected and distributed: money taken from local road users, for example, could be reinvested in local transport infrastructure.

## INFLUENCING INDUSTRY

Private industry is also an important part of the system. While councils are responsible for zoning land, setting consent conditions, and providing infrastructure, where development occurs and the quality of the resulting urban environment depends largely on private investment decisions. Developers, understandably, will be reluctant to invest in higher-density housing if they do not see a market for it; they may resist devoting land to public reserves or green space unless there is a clear requirement for them to do so (and if they don't, we risk creating ghettos instead of the attractive mixed-use areas envisaged by Hīkina te Kohupara).

New Zealand's resource management system has, since 1991, focused on managing effects at the margin with a minimum of government interference in private decisions. RM reform – through the proposed Strategic Planning Act and Natural and Built Environments Act – presents an opportunity to refocus attention on outcomes. Regulation under this new framework may be too slow to support Hīkina te Kohupara and will only work if supported by consumer preferences.

In relation to freight, we **support** Hīkina te Kohupara's supply-chain perspective. We share the Ministry's concern that allowing larger trucks on the road (a within-mode efficiency gain) may work against broader efforts to improve integration across modes. This could see larger reductions in emissions go unrealised. We agree that close consultation with industry will be necessary and accept that the characteristics of that industry will be a constraint. Nonetheless, just as individuals will be expected to change their behaviours and investment decisions, we **suggest** that Government should be clear about the ways in which the freight industry may need to change.

## RURAL COMMUNITIES; REGIONAL INFRASTRUCTURE

Checking that planned infrastructure investment is consistent with urban form and emissions reduction goals is appropriate –but a reliable, resilient transport network is not optional. The key point (made on p38) is that investment be reconsidered *if it would induce more vehicle travel*. While some roading projects in urban areas may fail this test, care should be taken not to lapse into the same assumptions for regional and rural roading networks.

We accept that the emphasis in Hīkina te Kohupara is on urban transport and freight, given that this is where bulk of emissions occur and the greatest gains are to be made. While the paper acknowledges the challenges of mode shift in rural areas, we note that it has little to say about solutions. Given the dearth of ready alternatives, roading networks will remain crucial for rural communities for the foreseeable future. Disincentivising private motor vehicle use – or reducing investment in road networks (perhaps by reducing speed limits instead) – is likely to have significant side effects in rural areas, risking inequities. We would also note that rural roads are important lifelines which may become increasingly vulnerable as we suffer more severe and more frequent adverse weather events over time. Given a large portion of the Horizons region is rural in nature, we are **particularly concerned** about the implications this could have on our rural communities and their ability to access health, social and economic opportunities.

Similarly, while work needs to start on improving inter-regional public transport connections, state highways and major local roads will remain the key connections between cities and smaller townships for the foreseeable future. There will be opportunities to shift intercity travel away from private motor vehicles as New Zealand's population grows; it is therefore essential that investment in infrastructure keeps pace.

## PUBLIC TRANSPORT

Decarbonising public transport has merit and we support it in principle. Like other parts of regional New Zealand, patronage in our region is low compared to the metro centres. We suggest that there is more to be gained by moving people onto public transport. We need bus patronage to increase for the cost of decarbonisation of the public transport fleet to be a viable investment in our region.

Achieving mode shift requires public transport services that present an attractive option to users. That means providing more frequent services, shorter routes, longer hours of operation, better information (on-street and online), etc. That all requires a significant increase in

investment. At present, we are struggling to meet the required current local share, and Waka Kotahi has very little available to support public transport services and infrastructure.

In parallel with improvements to public transport, we also need to address New Zealand's car culture: buses and trains will struggle to compete while it is so easy and affordable to travel by private vehicle, particularly in the regions. Increasing patronage outside the metro areas will be challenging – the more so if council budgets are diverted to decarbonising the fleet.

Central government support and funding will be critical for the regions if a mandate to decarbonise by a certain date is passed. Nationally, electrification of the passenger transport fleet (as recommended by the Climate Change Commission) is likely to greatly exceed the \$50 million previously set aside by Government for this purpose. We understand that, with Budget 2021, this funding has been subsumed into the \$300 million Green Investment Fund. While this is a large increase in quantum, we are aware that the Green Investment Fund runs across the whole of the economy. Prioritisation will be important if step changes in transport emissions are to be made. We hope that this scheme may help to provide public transport operators with enough scale and confidence to invest in costly new technologies and supporting infrastructure. We remain concerned that the sort of catalyst funding the Green Investment Fund is intended to provide may not align well with what is required to increase patronage and put public transport on a more competitive footing.

Realistically, we **recommend** that Government consider a staged approach to implementation and funding decarbonisation in the regions. A one-size-fits-all approach will present logistical challenges – not least of all, alignment of targets with tendering and contractual arrangements under the existing framework.

Beyond road transport, we note that interregional passenger rail appears to have been largely discounted as a viable option. A large proportion of New Zealand's population lives along the North Island Main Trunk line; we believe there is potential to make better use of this, as illustrated by the successful launch of Te Huia between Hamilton and Auckland. Our councils have long supported the Capital Connection, and are supporting an initiative to investigate the feasibility of a 'Northern Connector' service through the central North Island.

The paper notes that New Zealand's geography and low population density present challenges for an efficient transport system. We accept this. We also note that none of the reasons listed on pp13-14 for high per capita transport emissions are inherently about population or geography. New Zealand is not alone in having mountainous terrain and small towns: passenger rail links small populations across challenging terrain in other countries (Norway or Austria, for example). Terrain and population can make an easy excuse a failure to invest in infrastructure. Economic viability is important – but this depends somewhat on the frame of analysis. If low historic investment and potential cobenefits are not adequately reflected in the analysis, infrastructure upgrades will seldom appear economically viable. Interregional passenger rail may not be in the plan for Emissions Period One – but we believe it should be part of the range of possibilities considered for transport transformation in the longer term.

Conversely, we note that Hīkina te Kohupara appears to take short-haul air travel for granted. Again, alternatives may be challenging, especially in the short term. Looking overseas, there are compelling reasons that land transport (rail, in particular) can be more attractive than flying for short trips. Train stations are usually more conveniently located to town centres than airports; flying is fast, but travelling to the airport and waiting to board or collect your luggage makes the total journey considerably longer. Scandinavians increasingly shun unnecessary air travel due to *flyskram* (shame associated with flying). Reducing air travel might be difficult in New Zealand, but it's not impossible.



## ENERGY SUPPLY

Hikina te Kohupara points to a need for significant increases in renewable energy generation. While New Zealand has considerable untapped potential in biomass, wind, solar, and other forms of energy, development is not without its complications.

If we understand correctly, the area of new plantation forest envisaged by the Ministry to produce biofuels is considerably larger than the Climate Change Commission proposes. We do not take a position on whether this is feasible or not. We would, however, note that significantly increasing the area of plantation forestry carries with it environmental and social risks for rural communities. We also note that transporting slash to processing facilities is likely to lead to increased road wear (and carbon emissions).

The paper suggests a 14-fold increase in wind production. Again, we do not take a position on the feasibility or appropriateness of this development. In our region, wind turbines flanking Te Āpiti / the Manawatū Gorge have become iconic – but we note that, in other places, wind farms may collide with other community values. Under the current resource management regime, consenting of new wind projects (or, for that matter, hydroelectric projects) is difficult. As Hikina te Kohupara observes, consents that have been granted for several large projects have, until very recently, not been exercised. We understand that this is often related to commercial viability. Micro-generation may avoid some of the consenting difficulties associated with larger projects; economic viability, however, remains a constraint.

## TANGATA WHENUA INVOLVEMENT

Hikina te Kohupara proposes to establish a network of marae-based technical advisory groups, working with regional iwi to progress transport policy. From our own experience, we anticipate that meaningful engagement with tangata whenua will not only benefit the Treaty partnership but also provide insights into issues like inequitable access that affect the wider community, as well as potential solutions.

We would be interested to understand how the Ministry sees such an arrangement working in practice. Several different agencies already seek iwi engagement on a variety of subjects – regional and territorial authorities among them. Tangata whenua are not always well resourced to cater to these various demands; time engaging with government is often time away from paid employment and whanau.

The Committee **suggests** the Ministry may wish to discuss with local iwi and hapū whether there is merit in aligning conversations on climate-related topics, to support a more holistic response and avoid adding to the burden of consultation.

Thank you again for the opportunity to comment on Hikina te Kohupara. Should you have any questions relating to our submission, feel free to contact Tom Bowen at Horizons Regional Council ([tom.bowen@horizons.govt.nz](mailto:tom.bowen@horizons.govt.nz)).

Ngā mihi,



Rachel Keedwell  
**CHAIR**