

**Greater Auckland's draft submission to:
The Climate Change Response (Zero Carbon) Amendment Bill.**

- We welcome and support this bill, and appreciate the opportunity to comment. This bill is a huge step forward in New Zealand's response to climate change.
- The targets stated in clause 5O should be strengthened. Any target for 2050 should be net-zero emissions including biogenic methane. Greater Auckland believe this target should be brought forward to 2040. The emissions reductions in the 2020's and 2030's are the most important for limiting global warming. A net-zero target for 2040 will require immediate behaviour change, and this will provide a consistent message to all sectors. This will put New Zealand on a path to real improvements in environmental and social outcomes, and in leading business innovation. Below, we discuss ways to reduce Auckland's transport emissions.
- One of the most unnecessary ongoing contributions to climate change in New Zealand is the continuation of sprawl in our cities and towns. Although various transport and planning documents try to promote compact cities, a lack of clear legislative guidance and widely-held misapprehensions around intensification mean the building of yet more sprawl remains a terrible, ongoing reality.
- For New Zealand to meet its international emissions reductions commitments, transport emissions must drop considerably. In cities like Auckland, which have the highest ability to provide alternative transport choices for residents, emissions must be reduced at a far higher rate than for the whole country - perhaps a reduction of 60% of emissions in Auckland by 2030 will be required. A change of magnitude such as this requires a completely new approach to transport and land use planning. All the current barriers to investment in public and active transport must be raised, and the ongoing investment in roads to support greenfields growth must stop.
- How can the Zero Carbon Bill assist local government to achieve better planning outcomes in the situation that central government is slow to give clear direction? We support section 5ZK(1) for the ability it can provide. We expect the Government's plans will include enforcement ability relevant to specific functions.
- We would like to see a separate Commission established to deal with the considerations of adaptation. Focus on emissions reductions involves a mindset that is self-less, looking to minimise harm both in the hardest-hit countries and well into the future, and with both international diplomacy and technical understanding of reduction mechanisms in mind. Focus on adaptation involves a mindset that is nationally-focused, looking to minimise harm to current generations within our country, and with technical understanding of adaptation mechanisms in mind.
- We believe that two separate Commissions, one for Emissions Reductions and one for Adaptation are required. These should possibly have the same Chair. There are

no obvious synergies described in the Bill that wouldn't be better served than by this separated-but-connected structure.

- New Zealand's gross emissions need to include international transport including air travel. The Government needs to acknowledge that international tourism is not compatible with a responsible climate policy, and start transitioning the whole tourism sector from serving international tourists to serving New Zealand tourists travelling locally. Investing in quality, green, local tourism to attract New Zealanders to holiday locally is responsible, and can meet many other objectives of Government: improving access, regional development, road safety, employment, environmental and social outcomes.
- Insurance companies should be required to disclose climate risk, as it is important for the public to understand areas that may be at future risk of being uninsurable.
- The feedback to this bill should be considered for its content. Statistical analysis that splits submissions into types of submission forms or whether the submitter used a pro-forma template appears undemocratic. It may result in favouring people with more available time: older people, and people paid to write the submissions by industry. Government must accept that the burden of consultation is high, and that it is valid for people to seek a prepared submission that aligns with their views and to use it.

Auckland can rapidly reduce its Transport Carbon Emissions

The government needs to stop the Supporting Growth Programme and put all development focus into creating compact cities and towns. (That programme should be called Supporting Growth in Emissions, for that is what this sprawl does.)

For transport, the major challenge is reducing vehicle km travelled (vkt), which will need to reduce far more quickly than uptake of electric vehicles can manage.

In cities, the co-benefits (safety, air quality, improved placemaking and social outcomes, higher physical activity, better public health) of reducing vkt are very high. Reducing vkt is therefore a major opportunity. The following chart lists levers available to Councils and Road Controlling Authorities to reduce vkt.

WRONG DIRECTION - INCREASES VKT	VKT LEVERS IN CITIES	RIGHT DIRECTION - DECREASES VKT
Increase Road Capacity	Road Capacity	Decrease Road Capacity
Widen intersections for vehicles	Intersections	Reduce space for vehicles
W&C Budget Insufficient	Walking and Cycling	Invest in W&C Infrastructure
Decrease Safety	Safety	Increase Safety

Increase Parking	Parking Supply	Reduce Parking
Decrease Road Pricing	Road Pricing	Increase Road Pricing
Decrease Public Transport Infrastructure	Public Transport Infrastructure	Increase Public Transport Infrastructure
Increase Public Transport Fares	Public Transport Fares	Decrease Public Transport Fares
Decrease Public Transport Quality	Public Transport Quality	Increase Public Transport Quality
Sprawl	Land Use	Intensify
Evaluation Methods Dated Models	Land Use and Transport Evaluation Methods	Evaluation Methods Best Practice

Many of these levers are being used in the wrong direction, to increase vkt. Some are being used in the right direction, but their effect is cancelled by the levers used in the opposite direction. This creates terrible value-for-money. We need a consistent vkt reduction policy, so all levers are contributing together to the same outcome.

In rural and regional New Zealand, levers to reduce vkt will include:

- Transferral of freight from road to rail, including through re-establishing rail lines currently unused,
- Serious investment to reintroduce passenger rail throughout the country where lines still exist and can be upgraded.
- The establishment of a comprehensive National Public Transport Network. Travelling by bus produces far lower emissions than travel by private car.
- The establishment of walking and cycling paths between towns.

Additionally, the RMA will need to be revised:

- To overtly empower territorial authorities and regional councils to regulate activities by reference to the effect on climate change and greenhouse gas emissions;
- To clarify the RMA's requirement that new developments demonstrate they will not impose traffic effects. This requirement has been interpreted in a way that means the RMA is forcing developments to increase road and intersection capacity, and provide substantial off-street parking, which are all actions that increase traffic, vkt, sprawl and emissions.

Matters relevant to setting emissions budgets (Clause 5Z)

5Z covers the matters relevant to advising on, and setting, emissions budgets.

In general, we are concerned with many of these, and feel they will open up the chance for chain-dragging by the Minister, or litigation, and will make the Commission's job much harder. The emissions budgets should be kept isolated from politics.

The emissions budgets should be set according to the science. The advice for how to achieve these budgets should be kept separate from this.

5Z(2) (b) iv, v, viii, ix, x - No, these clauses should be removed.

5Z(2) (a), and (b) i, ii, vi, vii, xi - Yes, we agree with these considerations being taken into account.

5Z(2) iii - Yes, but existing technology only.

5ZD Setting Plans

A new clause should be added to this effect:

(e) a strategy to educate the public about the benefits of emissions reductions.

For example, the Government could immediately start some pilot schemes of low traffic neighbourhoods, mixed use farms, local composting hubs, etc, to demonstrate the investment in jobs, the better lifestyles, environmental and social outcomes that can come with rapid emissions reductions. In this way, more people can be enthusiastic about a low emissions future and the political path will be easier.

Section 5H

The expertise listed in section 5H (1) a to d aren't sufficiently focused on emissions reductions. The Commission needs to specifically include expertise in the areas of:

- behaviour change,
- urban land use and transport planning to deliver compact cities;
- carbon sequestration by building soil carbon;
- public health;
- energy.