

24 November 2021

Ministry for the Environment

PO Box 10362

Wellington 6143

Tēnā koutou,

Greater Christchurch Partnership submission on the Emissions Reduction Plan discussion document, *Te hau mārohi ki anamata: Transitioning to a low-emissions and climate-resilient future*

Introduction

1. Thank you for the opportunity to comment on *Te hau mārohi ki anamata*: the Emissions Reduction Plan discussion document.
2. Greater Christchurch is the largest urban area in the Canterbury region, with about 80% of the regional population and 40% of the South Island population.
3. The Greater Christchurch Partnership is a collaborative partnership in the Greater Christchurch area. The Partnership has been in existence since 2007 and is focused on integrated transport, infrastructure, and land use planning in the context of intergenerational wellbeing. Members of the Partnership consist of the Councils (Christchurch City Council, Selwyn District Council, Waimakariri District Council and Environment Canterbury), Te Rūnanga o Ngāi Tahu, the Canterbury District Health Board and Waka Kotahi NZ Transport Agency (as a non-voting member).¹
4. We note that Environment Canterbury, Te Rūnanga o Ngāi Tahu, Christchurch City Council, and Selwyn District Council are also making individual submissions. The Partnership supports careful consideration of these submissions.

Key submission points

5. The Greater Christchurch Partnership commends the release of the discussion document as a significant step towards achieving New Zealand's climate goals and playing our part in global efforts to reduce emissions. It is vital that we have an ambitious, coordinated and aligned whole-of-government response to climate change.
6. The Partnership broadly supports the overall direction and approach outlined in the discussion document. We have heard from our community that urgent action is needed to

¹ Waka Kotahi as a crown entity is not being represented in this submission.

achieve our targets for 2050. Significant progress is needed in the short-term to ensure a just transition in the long-term. We are concerned that the current suite of planned policies suggested in the consultation document leave a gap between expected reductions and those required to meet the emission budgets. There needs to be a greater focus on reducing emissions through domestic efforts in the short term.

7. To help give effect to the Emissions Reduction Plan, some **clearer explanation on how New Zealand should reduce its emissions should be included**. Some analysis of the order in which projects should be implemented and identification of which actions are able to deliver the greatest emission reduction for the least cost, would help to build momentum for implementation of the Plan.
8. This submission therefore focuses on a few key points of particular interest for the Partnership, including transport, integrated land-use and infrastructure planning, and a strengthened partnership approach between central government, local government and mana whenua.

Working with our Tiriti partners

9. It is important that the Government understands how the changes it is proposing will affect iwi/Māori. The Partnership **strongly agrees that iwi and hapu/rūnanga should be enabled to work with government agencies to devise policy and direct funding**.
10. Ngāi Tahu has the largest Takiwā of any iwi across Aotearoa, and should be involved in working with the Crown in further developing the various strategies in relation to the Emissions Reduction Plan. In particular, towards addressing Māori-led or Māori oriented solutions for some of the strategies. The Ngāi Tahu Climate Change Strategy is an example of a very successful Māori-led strategy.

Working with local government

11. Local government plays a significant role in New Zealand communities' transition to a low-emissions and climate resilient future. Local government's proximity to communities means it's well-placed to help drive and influence some of the behaviour change that is needed. Urban planning, transport and waste services are important functions for local government and central government will need to work closely with us to implement the changes proposed in the Emission Reduction Plan. It also means local government is well-placed to help the Government understand the inequities that may result to local communities from the transition and how they can be supported through that transition.
12. Therefore, we recommend **developing a clear ongoing partnership approach with local government to support development and implementation** of the Emissions Reduction Plan going forward. We also recommend providing interventions that will support local government to help deliver emission reductions. Examples include:
 - a. Decision-making tools that integrate climate change into cost-benefit analyses – e.g. emissions impacts, and implications of future climate policies such as carbon shadow pricing.
 - b. Nationally collected data using an established and widely recognised measuring methodology to enable districts to more easily, consistently and cost effectively monitor and report on community emissions, i.e. the Ministry for the Environment

and Statistics New Zealand setting up a programme of work on the greenhouse gas emission inventories of New Zealand districts using, for example, the Global Protocol for Community-Scale Greenhouse Gas Emission Inventories.

Funding

13. The consultation document provides little detail on funding for key proposals and policies suggested to help reduce emissions – despite stating that *'climate change requires a step change in how we approach financing'* (page 34). Without more certainty around funding commitments from central government, it is unlikely that local government or the private sector will have confidence to increase their own climate commitments.
14. It is noted that currently proposed policies will leave a significant gap between actual emissions reductions, and our international commitments (our NDC), which will require enormous amounts to be paid towards international offsets in the future (with a \$1billion per year figure quoted in media). We would **prefer that the central government invest a higher proportion of that money in New Zealand now to drive greater emissions reductions at home.**

Making an equitable transition

15. The Partnership supports the level of attention afforded to equity. The transition to a low-emissions transport system, and particularly the greater use and application of pricing mechanisms, has the potential to exacerbate existing inequities in access in many of our communities.
16. We recommend the government **provides easy to understand information** on where most emissions come from and a few basic (and affordable) things people can do to reduce their footprint. This will encourage behaviour change.
17. We also recommend that the government provide or fund low-emissions alternatives for the public. For example – incentives for active travel (e.g. electric bikes), funding public transport improvements or cycleways which provide people low-emission alternatives to driving fossil fuel vehicles. Policy decisions can impact emissions in a cost effective way by, for example, creating slow speed environments or putting in place minimum passing distances, which make our roads safer for people keen to bike or use other micro-mobility such as e-scooters. Decarbonising the electricity grid is another action which would enable families to lower their carbon footprint.

Alignment of the transition with other priorities

18. The Partnership would like to see **greater co-ordination of policy direction** across central government relating to emissions reduction, in particular the reform of the Resource Management system, the National Policy Statement on Urban Development and development of the National Adaptation Plan. Presently, there are seemingly conflicting outcomes sought from various policy statements on transport and urban development which impede real progress being made to reduce emissions.

Integrating land-use, urban development and transport

19. A focus on **strategic growth planning (such as through spatial plans) is fundamental to achieving a coordinated approach to land use and infrastructure planning**, and for

providing certainty about how our urban areas will grow and change in the future. We support the role of strategic planning and investment in lowering emissions in our urban centres by planning for more compact urban forms that support transport choice. For example, emissions impacts should be a material consideration in resource management decisions.

20. Delivering a quality, compact urban form requires upfront investment in infrastructure. This particularly relates to the urgent need to plan for and invest in better transport options and urban land use to increase development in locations that support access, decrease travel times and reduce emissions. We recommend that the Government **provides strong support for local government decisions** on such land use and transport/infrastructure integration.
21. The form and location of residential development influences the long-term emissions from a city. Well-located residential intensification, for example around key nodes, which have a diversity of work, retail, recreational and transport opportunities nearby, would enable people to more easily access their daily needs. We agree that **more high to medium density housing is a way to contribute to emissions reductions**. But this needs to happen in partnership between central and local government, and needs to be supported by adequate funding for infrastructure.
22. Many of the measures the Government is considering to reduce emissions from new and existing buildings already exist to some extent in New Zealand, and simply need to be expanded or mandated to broaden adoption. The Partnership **recommends integrating resource management system reform work with the Building Act reform to drive green engineering in building design**; solar panels and stormwater collection/use, electric vehicle charging infrastructure in new builds, for example.

Transport initiatives and actions

23. Transport planning and investment needs to be aligned with emissions reduction goals. The Partnership supports the initiatives and actions proposed for reducing transport emissions during the first budget period, with the aim of being more ambitious in mode shift. We also support the proposed targets for transport.
24. However, **there are significant barriers to be addressed to meet these targets, including insufficient funding, current investment and decision-making models not being fit-for-purpose, and a need for stronger coordination and delivery mechanisms** across both central and local government. A step change in funding from central government is required to meet these targets.
25. The Partnership broadly supports the proposal to review and implement the Greater Christchurch mode shift plan, but this will require central government support of its implementation.
26. We support the proposed approach in the first budget period to substantially increase funding for walking and cycling improvements, and the emphasis on support for local authorities to design and deliver these at speed. We recommend the government **works more closely with local government on the types of policies that are needed, and provide far greater funding for implementing them**.

27. **Investing in improving public transport services** is likely to have a greater impact on growing ridership than reducing fares. We support the improvement of public transport availability and infrastructure to reduce emissions. However, additional funding for public transport is currently the biggest barrier to expanding the frequency and coverage of our public transport networks, including to progress the Greater Christchurch Public Transport Futures programme. We acknowledge the government's commitment to progressing mass rapid transit in Greater Christchurch in partnership with the GCP.
28. The Partnership supports fast-tracked processes and new mechanisms to reallocate existing road space, where appropriate (e.g. it would not be appropriate in proximity to wāhi tapu sites). However, any fast-tracking processes must provide opportunities for mana whenua to be involved in decision making.
29. Pricing tools have the potential to support a range of transport outcomes, including enabling a shift to a more user-pays approach to funding road maintenance. **Applying new pricing tools could allow a fairer allocation of costs** and should be enabled across metropolitan areas such as Greater Christchurch.

Research, science and innovation

30. Canterbury is a centre of excellence for innovation in the Food and Fibre sector (see [Food, Fibre and Agritech Supernode](#)). New Zealand stands to gain significantly by creating local and globally needed solutions to support net zero emissions food and fibre production. This will be a vital part of our bio and knowledge-based economies. **New Zealand has an opportunity to be world leaders in developing technologies which help reduce agricultural emissions, and create a more sustainable agricultural sector.**
31. Innovation is a particular area where the funding structures that are available are creating barriers to local authority investment. As innovation is considered an operational expense, Councils are required to fund this through rates alone. This means it is significantly constrained in comparison to investment in infrastructure for which, as a capital expense, councils are able to access other significant funding streams. We recommend the government looks into further seed funding for local authorities to invest in emissions reduction innovations. As an example, we note the success of the Waka Kotahi Innovating Streets Fund.

Energy sector

32. The government needs to invest heavily in renewable energy. A significant part of our net zero transition pathway is to electrify more of our transport and industry. This requires both a scaling and a transition of our energy sector to renewables.
33. Energy affordability and reliability are also important to support a just and economically viable transition for our communities and our businesses towards zero carbon energy options.

Reducing waste

34. We acknowledge that preventing waste at source is the most effective way to reduce emissions. Greater Christchurch is moving towards a zero-waste economy by jointly planning regional waste solutions. Moving to a net zero emissions economy will require

transformative change in production and consumption – doing more with less and managing waste better. Greater Christchurch has a large proportion of employment in high emission industries like agriculture, logistics and tourism.

35. We recommend against large waste-to-energy schemes that rely on long-term waste streams and therefore provide no incentive for waste reduction. For example, to ensure energy from waste plants' long-term security, waste contracts might be required for up to 25 years. Instead, we encourage capture and use of emissions that are relatively unavoidable (landfill gas etc.).
36. Partnering with local government on initiatives to reduce emissions from waste is critical. We consider that in order to meet this goal, it will be necessary to increase investment in this area including broadening how the waste-levy can be used to fund research, new infrastructure, capital works and equipment.

Closing remarks

37. The Greater Christchurch Partnership broadly supports the overall direction and approach outlined in the discussion document that will be included in the final Emissions Reduction Plan. The Greater Christchurch Partnership recognises the direction and key changes required for reducing emissions in New Zealand, and for setting out how the Government will work with others to realise this vision.
38. The Greater Christchurch Partnership **strongly agrees with the importance of and urgent need to address climate change** for the benefit of current and future generations, and agrees that our urban areas need to do more to plan for and adapt to climate change. This is particularly in the context of the Climate Commission's recent reporting that New Zealand's transport system will need to be almost completely decarbonised to meet the recommended emissions reduction targets for 2050. Our urban areas will need to play a major role to help achieve this.
39. However, as outlined in this submission, we believe that the Emissions Reduction Plan should have a stronger focus on working with mana whenua and local government. More certainty around funding of the key proposals is essential to ensure confidence and enable implementation. Our urban areas are growing and changing. There needs to be strategic planning and investment in lowering emissions in our urban centres by planning for more compact urban forms that support transport choice.
40. The Greater Christchurch Partnership appreciates the opportunity provided to comment on *Te hau mārohi ki anamata*: the Emissions Reduction Plan discussion document. We would be happy to discuss our submission further with you. For any clarification on points within this submission, please contact secretariat@greaterchristchurch.org.nz.

Nāku, nā



Jim Palmer

Greater Christchurch Partnership Independent Chair