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Low-emissions economy inquiry
New Zealand Productivity Commission

Email: info@productivity.govt.nz

Dear Sir or Madam,

Environment Canterbury submission: Productivity Commission Low-emissions economy issues paper

Thank you for the opportunity to make a submission on the Commission's issues paper for the Low-emissions economy inquiry. Please find Environment Canterbury's submission attached.

Environment Canterbury's submission is focused on transport in light of the Council's role in regional transport under the Land Transport Management Act 2003 and the Local Government Act 2002. In particular, the submission identifies some of the challenges Environment Canterbury faces from a regional transport planning and public transport perspective. The submission also recommends that the inquiry explore the interface between urban planning priorities, transport emissions and the transition to a low-emissions economy.

Environment Canterbury looks forward to ongoing involvement as the Productivity Commission, and ultimately the Government, takes this work forward.

For all enquiries please contact:

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Yours sincerely

A handwritten signature in black ink that reads "Steve Lowndes".

Steve Lowndes
Acting Chairman

Encl: *Environment Canterbury Submission on the Productivity Commission's Low-emissions economy issues paper*

Environment Canterbury submission: Productivity Commission's Low-emissions economy issues paper

1. Environment Canterbury's key submission points are:
 - Existing transport planning and investment models do not support innovative multi-modal transport solutions that could deliver emission reductions in the transport sector, and should be reassessed
 - That the role of public and active transport in the transition to a low-emissions economy should be considered
 - That the inquiry explore the interface between urban planning priorities, transport emissions and the transition to a low-emissions economy.
2. Environment Canterbury thanks the Commission for the opportunity to comment on the Low-emissions economy issues paper.
3. Environment Canterbury acknowledges the importance of and urgent need to address climate change for the benefit of current and future generations, and the need to explore how to transition to a lower net-emissions economy. Environment Canterbury looks forward to ongoing involvement as the Commission, and ultimately the Government, takes this work forward.
4. As noted in previous work by the Commission, responsibility for mitigation policies effectively rests with central government. As a consenting authority under the Resource Management Act 1991 (RMA), our role in managing the mitigation component of climate change, and particularly through discharges to air, is limited.
5. However, as a regional council we implement regional transport policies that impact transport emissions. Environment Canterbury delivers regional transport planning and public transport under the Land Transport Management Act 2003 and the Local Government Act 2002.
6. In carrying out our transport responsibilities, we are required to give effect to the Government Policy Statement on Land Transport (GPS), which outlines the government's priorities for investment in transport, primarily roads. The mitigation of adverse environmental effects, including CO₂ emissions, is an objective in the current draft GPS 2018, but it is not a priority objective.
7. This submission reflects our experience in delivering our transport functions, and focuses on some of the challenges associated with incentivising increased public transport use.
8. Environment Canterbury convenes and chairs the Canterbury Regional Transport Committee, which prepares the Canterbury Regional Land Transport Plan. This Plan outlines all significant transport investments that will take place over a period of ten years. Environment Canterbury also has statutory responsibility for the provision of public transport services in the Canterbury region and works alongside territorial authorities to deliver these.

9. A key focus of the Canterbury Regional Transport Committee is to provide an efficient, accessible and resilient transport system. The availability of effective transport alternatives is a core component of this, whether these be:
- good quality walkways, footpaths and cycling infrastructure that enable connectivity (particularly in light of the ageing population)
 - reliable and efficient public transport services that reduce dependency on the single occupancy vehicles that congest urban centres, or
 - wider consideration of the role rail and coastal shipping can play in developing resilient freight supply chains and reducing congestion.
10. It is well recognised that all three of the above enable significant emission reductions in the transport sector.

A funding model that enables multi-modal transport solutions

11. A key challenge for the Canterbury Regional Transport Committee is to encourage mode shift to reduce the number of trips made in vehicles and to enable significant projected freight growth with minimal adverse impacts.
12. The existing transport funding model, however, incentivises councils to focus exclusively on road transport solutions, and regions are unable to adopt the best solution to transport issues, whether it be road, rail, air or sea. We believe that central government needs to support multi-modal transport outcomes so that regions are enabled to develop innovative multi-modal solutions, where reducing transport emissions is a real possibility.

The role of public transport in transitioning to a low-emissions economy

13. Environment Canterbury recommends that the Commission explore the potential role of public transport in the transition to a low-emissions economy, and identify whether and what additional incentive structures would be required for this. We consider that accessible public transport, and an efficient transport system more broadly, present significant opportunities for reducing emissions in transport, while also providing many other benefits.
14. Environment Canterbury supports the Commission's commentary on transport emissions, and particularly around the role of public transport, reduced vehicle use, and transport system efficiency. This submission focuses on the challenges associated with public transport, some of which are specific to a post-earthquake Canterbury, but also others that are experienced more broadly.
15. The Commission notes that improving the efficiency of the transport system and reducing the use of cars can positively impact on emission levels, traffic congestion and health. Environment Canterbury agrees with this, and further wishes to highlight that public transport is also a key component in delivering strong community outcomes and local/regional economic benefits through enabling the efficient and accessible transportation of people across the community for employment, social and community based activities. This is consistent with previous work of the Commission, where it

identified efficient public transport as an essential service for successful cities (Better Urban Planning, Final Report).

16. Public and active transport use in Christchurch is low, both from an international perspective and when compared to Wellington and Auckland. 2013 census data recorded that the proportion of journeys to work by public transport were 3 percent, walking 6 percent, and cycling 8 percent, compared to 83 percent by private vehicle. Yet 50 percent of all journeys of those living in Christchurch were under 5km, which would appear to lend itself well to public transport, walking or cycling.
17. Public transport in Canterbury, and particularly greater Christchurch, faces a number of challenges. Some of these are Christchurch specific due to the 2010-2011 earthquakes, and particularly the slower than anticipated progress of the rebuild. This has resulted in:
 - significant disruption to the public transport network performance resulting in poor reliability and journey times
 - delays in the CBD rebuild and the construction of core anchor projects, compromising the demand for public transport within the CBD – the CBD is still two to five years from its pre-quake employment, social and tourism activity population
 - low cost parking within the CBD due to the availability of land, which increases the attractiveness of private car travel compared to public transport.
18. These issues are also coupled with the wider public transport challenges experienced across New Zealand. These include:
 - past and existing (and potentially future) settlement patterns which have led to distributed housing and employment patterns (particularly in Greater Christchurch post-earthquake)
 - economic and population growth, which has increased transport demand and car ownership
 - a lack of incentives (or disincentives) to encourage behaviour change towards public or active transport and away from private vehicle use (and particularly single occupancy vehicle use).
19. The above factors have resulted in a behavioural pattern in Canterbury that will be difficult to change, especially under existing incentive and public transport funding structures. Environment Canterbury recommends that the Commission further explore what changes to the transport planning system would most efficiently reduce transport emissions, while also identifying the co-benefits of any such changes. Given the well-recognised (and broad) benefits of an efficient public transport system, a focus on this would appear sensible.

Public transport and urban planning

20. Environment Canterbury considers that there is merit in exploring how urban planning initiatives, and particularly those where urban environments are expanded, can align with transitioning to a low emissions economy. Expanding cities' urban areas to provide more

land for housing development is likely to result from recent national initiatives to address housing affordability issues.

21. Environment Canterbury acknowledges previous commentary from the Commission on urban planning and emissions, and agrees that the relative effectiveness of emission reduction initiatives needs to be assessed. We agree that there are likely to be more cost-effective mechanisms for reducing emissions than through urban planning.
22. However, although developing efficient transport infrastructure is a key component of future urban development, the extent to which planning initiatives that expand urban areas will overcome existing distributed housing and employment patterns (and thereby risk creating further path dependency issues) is unclear.

Conclusion

23. Environment Canterbury thanks the Commission for the opportunity to make a submission on the Low-emissions economy issues paper. We look forward to the draft report due in February 2018 and its recommendations.

For further enquiries:

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