

---

25 June 2021

Transport Emissions  
Ministry of Transport  
Wellington

By email: [transportemissions@transport.govt.nz](mailto:transportemissions@transport.govt.nz)

---

**Submission on Ministry of Transport's discussion document, *Hikina te Kohupara – Kia mauri ora ai te iwi – Transport Emissions: Pathways to Net Zero by 2050***

---

## Introduction

1. This is Infrastructure New Zealand's submission on the Ministry of Transport's discussion document, 'Hikina te Kohupara – Kia mauri ora ai te iwi - Transport Emissions: Pathways to Net Zero by 2050'.
2. Infrastructure New Zealand is New Zealand's peak industry body for the infrastructure sector. We promote best practice in national infrastructure development through research, advocacy and public and private sector collaboration. Our members come from diverse sectors across New Zealand and include infrastructure service providers, investors and operators.
3. Infrastructure New Zealand welcomes this opportunity to make a submission on the consultation document. We note feedback will inform the transport chapter of the government's draft Emissions Reduction Plan.
4. Please direct enquiries to Claire Edmondson, Chief Advisor, at [claire.edmondson@infrastructure.org.nz](mailto:claire.edmondson@infrastructure.org.nz).

## Discussion

### Lead by example

5. The discussion document sets out potential pathways and policies to phase out emissions across the transport system by 1 January 2050, to meet the legislative net zero requirement stipulated in the Climate Change Response Act 2002.
6. It is currently not clear what specific actions central and local government are proposing to undertake for themselves to meet the net zero requirement.
7. Infrastructure New Zealand submits that central and local government should lead by example, e.g. a plan for how central and local government will completely decarbonise their transport fleet, including road vehicles/trains/ships they own and lease.
8. We further submit that a phased approach would be useful, that is, an initial focus on central and local government (including public transport services) and then on businesses and households. A phased approach will help the government understand implementation challenges and provide better directives when rolled out to businesses and households.

## General remarks

9. Infrastructure New Zealand notes that the consultation document proposes six well-intentioned principles. We submit these principles need to be supported by measures that are part of an implementation plan.
10. Achieving net zero transport emissions will be expensive for local government, e.g. public transport infrastructure to cater for the increased mode shift and a 100% zero-emission public transport fleet. Councils are already financially stretched and rates are already excessively high. The government needs to adopt a position on what financial assistance it will provide to local government to help achieve the transition to net zero emissions.
11. There is a need to ensure that New Zealand does not experience an energy shortage, e.g. electricity, resulting in price shocks and having serious implications for households as well as the cost of doing business.
12. We are encouraged by the inclusion of aviation emissions in the discussion document, but are disappointed by the absence of discussion on emissions of space-bound rockets. We look forward to discussion on lowering emissions from space-bound rockets being included in the draft Emissions Reduction Plan.
13. Infrastructure New Zealand does not support a road pricing mechanism based on distance-charging given the:
  - (i) prerequisite infrastructure and public transport services required to facilitate mode shift are not in place
  - (ii) serious inequity issues for New Zealanders who live further away from where they work, who have no viable (adequate and frequent) alternative to private vehicle use and for whom the use of private vehicle has characteristics of inelastic demand.
14. We submit revenue neutral schemes should be just that, i.e. accrued surpluses should be returned to the households and businesses through some mechanism, e.g. tax cuts and/or lower charges. We often see the unintended consequence of surpluses being funnelled towards projects that are not necessarily required, e.g. local beautification projects passed off as placemaking initiatives.
15. There is value in considering the net benefits of offering grants, rebates or other incentives for the replacement of older, fuel inefficient vehicles with electric vehicles.

## Urban, transport and land-use planning

16. There is an opportunity to reduce transport emissions by changing the current approach to urban developments.
17. Infrastructure New Zealand is encouraged by discussion on the need for integration between urban, transport and land-use planning. Currently, most greenfield developments are primarily concentrated on the supply of residential dwellings with office, commercial and industrial activities as well as public transport services being an after-thought. As such, there is a dependence on private vehicles from the outset due to limited to no meaningful local employment opportunities. And so, as an example, when bus services eventually do get introduced, they are not as attractive an option because:
  - most residents are no longer able to easily switch to public transport, especially where they are travelling much longer distances and where public transport options would require transfers (and waiting times between those transfers)
  - buses then become caught up in traffic congestion and where passengers require to transfer to another bus or train, they get significantly delayed.
18. There is also the need to ensure prerequisite infrastructure is in place to facilitate mode shift and thereby reduce transport emissions. For instance, not all New Zealanders have access to

adequate and rapid/frequent public transport and/or public transport infrastructure, e.g. at capacity park and ride facilities. As stated earlier, for New Zealanders living further away from work, private vehicle use usually has characteristics of inelastic demand.

19. Similarly, there is a need to understand New Zealanders' travel patterns and what can be done to change travel needs and patterns, e.g. working from home and providing meaningful employment opportunities within local catchments.
20. The Auckland Plan 2050, for instance, identifies five nodes other than the Auckland City Centre that are meant to provide flexibility and choice for business by providing business opportunities and business land in close proximity to deep labour pools with an interconnected transport network. This is supposed to make more jobs and educational opportunities accessible to more people without them having to travel long distances. The challenge is making this a reality.
21. Infrastructure New Zealand therefore submits that the first theme should be expanded to as follows:
  - Theme 1: Changing why and the way we travel.
22. In the absence of addressing the above issues, measures such as the levying of congestion pricing and high emissions-related taxes would only be regarded as punitive taxes.

## Conclusion

23. Infrastructure New Zealand thanks the Ministry of Transport for the opportunity to make this submission.
24. We look forward to the release of the government's draft Emissions Reduction Plan later this year.

25 June 2021

