



**SUBMISSION: Hikina te Kohupara – Kia mauri ora ai te iwi Transport Emissions:
Pathways to Net Zero by 2050
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Ministry of Transport

Te Manatū Waka

Hikina te Kohupara – Kia mauri ora ai te iwi Transport Emissions: Pathways to Net Zero by 2050

Business North Harbour (BNH) representing the North Harbour Business Improvement District welcomes the opportunity to make this submission to the Hikina te Kohupara – Kia mauri ora ai te iwi Transport Emissions: Pathways to Net Zero by 2050.

BNH is a significant commercial and industrial Business Improvement District (BID), representing over 4,500 commercial property owners and businesses within the North Harbour area. Collectively they employ over 35,000 Auckland residents and ratepayers.

The organisation is located within the Upper Harbour Local Board area, which is expected to be the fastest growing area in the country over the next ten years, in both absolute and percentage population terms¹ which brings both challenges and opportunities to the North Harbour business district. BNH represents and works with a wide range of businesses comprising of a mix of sole traders, Small Medium Enterprises (SME), through to multi-national organisations representing sectors such as ICT, business services, specialist manufacturing, light – medium warehousing, logistics, retail, and hospitality. In addition, we have key educational institutions within or on our boundary, including Massey University Albany and AUT Millennium, along with a variety of primary and secondary schools including Rangitoto College, the largest secondary school in New Zealand. All are located within an industrial estate which is on average less than 20 years old.

Of critical importance to the Association and its members is transport through our business precinct, with the efficiency and effectiveness of the arterial roads (and their connections to motorways) being of paramount importance. Also of importance is that the Precinct be well served by public transport.

Our feedback will cover:

- I. Response to specific questions: 1,2,6,8-10 and 12
- II. General Comments
- III. Conclusion

1. Auckland Council 10-year Budget 2018-28, Supporting Information, Section 6: Local Board Information, 6.17 UHLB

I. Response to Specific Questions

Your Green Paper asks for feedback on twelve questions, we are answering those which require further explanation.

1. Do you support the principles in Hikina te Kohupara? Are there any other considerations that should be reflected in the principles?

In general, BNH supports the principles, but we would make the following observation. Understandably there is a strong focus on Maori and Pacifica people to encourage actions to reduce emissions amongst these communities, however Aotearoa is now a diverse country with many overseas born New Zealanders who must not be excluded from this review. Everyone, regardless of ethnicity should be encouraged, as a united Aotearoa, to make the necessary behavioural changes.

2. Is the government's role in reducing transport emissions clear? Are there other levers the government could use to reduce transport emissions?

The government has the opportunity to be a world leader in enforcing international rules on reductions to the aviation and maritime industries. This can be achieved by stipulating all new vehicles and future transportation into Aotearoa must utilise the most efficient fuel meeting set guidelines. For example, stipulating that from 2058 all planes entering Aotearoa's airspace must be low emission, which takes into consideration a reasonable notification period to the industry based on the average life span of an aeroplane (36 years).²

6. Pricing is sometimes viewed as being controversial. However, international literature and experiences demonstrate it can play a role in changing behavior. Do you have any views on the role demand management, and more specifically pricing, could play to help Aotearoa reach net zero by 2050?

The association believes in encouraging Aucklanders to live, work, and entertain locally, thereby reducing congestion and emissions. Therefore, we see the Congestion Question affecting this objective.

Please refer to the Business North Harbour [Congestion Charging Submission](#).

8. Do you support these possible actions to decarbonise the public transport fleet? Do you think we should consider any other actions?

We understand that Aotearoa's targets need to reduce emissions therefore the New Zealand people need to be educated to move to more sustainable options. To encourage this change the New Zealand government needs to be seen to be leading the way. However, the current statistics indicate that the public buses are only responsible for 1% of emissions, and with the high cost of purchasing replacement, low emission buses Business North Harbour recommends that the money allocated for the replacement of the bus fleet be conservatively allocated initially as by focusing on more efficient options and allowing for future improvements in bus technology, this would reduce the risk of having to further invest in the same fleet as technology improves. Some of the funding allocated to this initiative could in the short-term be allocated for example to freight and aviation reductions, with the buses being replaced with the decarbonized options when required.

Sanguinely taking into consideration that moving forwards 'new' technology should be more cost efficient with more competition launching in the market.

² <https://www.bts.gov/average-age-aircraft-2019>

9. Do you support the possible actions to reduce domestic aviation emissions? Do you think there are other actions we should consider?

BNH does support the possible actions to reduce domestic aviation emissions. However, as stated in Question 2 BNH recommends enforcing by 2058 all marine and aviation vehicles entering Aotearoa's waters/air must be low emission. NZ can be one of the world leaders driving international change.

10. The freight supply chain is important to our domestic and international trade. Do you have any views on the feasibility of the possible actions in Aotearoa and which should be prioritized?

As stated in your Green Paper: there are approximately 150,000 trucks on the road, travelling a combined total of nearly three billion kilometres. These heavy vehicles, the majority of which are freight vehicles, are responsible for almost a quarter of Aotearoa's transport GHG emissions. Therefore, decarbonising road freight should be prioritised and incentivised as we believe that this will provide the best opportunity for Aotearoa to significantly reduce freight emissions.

BNH believes that more research is required and should be prioritised on route-optimisation equipment, vehicles and future technologies.

BNH supports the comment 'We could encourage data sharing and cross-business collaboration'. We believe that this should be happening as it would benefit all involved.

12. A Just Transition for all of Aotearoa will be important as we transition to net zero. Are there other impacts that we have not identified?

BNH would offer the following comments:

You have identified transport poverty however, introducing congestion charging will not rectify this problem.

We agree with the government investigating biofuel opportunities. In the medium term, the Government could introduce a carbon intensity standard, which is fuel agnostic (e.g., it could also apply to hydrogen fuel) and would require more time to implement than a biofuel mandate.

As stated in the Green Paper the 'emissions from domestic maritime activities were not modelled in our pathways', with this contributing to approximately 3% of emissions. This should be reviewed and actioned.

We disagree with the 'Clean Car' discount as low-income households will not be able to afford an electric vehicle (EV), therefore the government will end up providing discounts for the wealthy and taxing the poor. In addition, the rural populations which would be disproportionately affected (E.g., EV cannot tow horse floats and combine harvesters).

II. General Comments:

1. COVID created terrible publicity for public transport with many different forms being branded as 'travelling incubators '. Consequently, there needs to be an urgent public campaign to emphasize the positive benefits of using public transportation, possibly backed with an incentivisation scheme.
2. With the recommendation of EVs and the future planning of our cities, where will the public be able to park their cars to charge? The government must ensure that whatever behavioural changes they require, the necessary infrastructure and services are in place to enable these changes to happen.
3. Factoring in the cost to the environment of charging the cars and the removal of the used batteries must be considered.
4. There needs to be a strong focus through media and on-road signage on educating the New Zealand public, to enhance road safety and reduce road rage. Although the following is stated in the Waka Kotahi NZ Transport Agency Road Code, there seems to be a train of thought amongst some communities that the cost and time required are not worth the effort to obtain a NZ Driving Licence. We urgently need a national public campaign to remind drivers to:
 - a) Keep to the left on motorways unless overtaking
 - b) Merge like a zip
 - c) Move safely to the left when emergency vehicles are needing to pass.
5. A review of combining the existing Transport polices from the national and local authorities would reduce confusion. The national policies should be streamlined and adopted throughout Aotearoa to be consistent, with specific amendments to cater to different regions.

III. Conclusion

In conclusion, the association believes effort, time and money should be spent where the largest gains can be made to reduce emissions.

As stated in the Green Paper as 'the population grows, the level of transport and non-transport infrastructure investment needed would also increase simply to maintain and manage the demand.' Therefore, funding needs to be allocated for the infrastructure.

Finally, as we enter another very uncertain year, especially for small and medium sized businesses, we ask that the Hīkina te Kohupara – Kia mauri ora ai te iwi Transport Emissions: Pathways to Net Zero by 2050, consider the financial situation of the business community, therefore ensuring that the initiatives can support and grow the economy.

Yours sincerely,

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