

## Submission from Zero Carbon Nelson Tasman Incorporated on the **Nelson Future Access Project**

Zero Carbon Nelson Tasman is an incorporated society with nine directors (Joanna Santa Barbara, Jack Santa Barbara, Bruce Gilkison, Jenny Easton, Olivia Hyatt, Yuki Fukuda, Carolyn Hughes, Alistair Munro and Julie Nevin). We have a broad range of expertise which include education, environmental science, energy, medicine and business. We work with councils and communities to reduce regional emissions so that we can limit the global temperature increase to less than 1.5°C and build resilience in adapting to climate change.

We commend the direction and initiatives outlined within the Short-term Package. This will support and greatly enhance some of the direction and transport work both the Nelson City and Tasman District Councils have undertaken in recent times. If the elements of the short-term package has sufficient funding and are well integrated into a systems approach of the whole region, this package alone has the potential to meet the outcomes on page 2.

**We have significant concerns**, however, about all three long-term packages proposed in this consultation. This consultation document lacks any significant discussion of the carbon emissions from building these roads/lanes AND any information (beyond short statements and rankings) that we can use to decide on the best package in adapting to sea level rise. It does not mention any requirements under the **Climate Change Response (Zero Carbon) Amendment Act (CCRAA)**, to be net carbon neutral by 2050. As a transport sector and as a region, we need to **halve emissions by 2030** (IPCC 1.5°C report), which is in keeping with the purpose of the CCRAA and **reach net zero carbon by 2050**. The emission budgets under the CCRAA will require stepwise reductions and, without providing information on the carbon emissions created by any of the long-term transport packages, it is misleading to ask the public what they want, based only on price. **We, therefore, cannot support any of the three packages** at this stage because we do not know what the construction emissions or the long term emission consequences will be.

We suggest the following be taken into account:

1. The legal position is that Section 5ZN of the ZCA provides that: “ *if they think fit, a person or body may, in exercising or performing a public function, power, or duty conferred on that person or body by or under law, take into account- : (a) the 2050 target or; (b) an emission budget or; (c) an emission reduction plan*”. We consider that the 2050 target, and the first national emission reduction budget (to be released on 31 May 2021) should be mandatory considerations for the councils and NZTA because it is clear that the carbon emissions from making these roads need to be considered in accordance with the Act.
2. In addition Section 3 of the ZCA includes the statutory target of limiting the global temperature increase to less than 1.5 degrees Celsius, and this should also be

considered by the council and NZTA. Following IPCCs recommendation carbon emissions have to be halved this decade.

3. The Zero Carbon Act is designed to protect future generations from the extremes of climate change. Councils have responsibilities to take into account the reasonably foreseeable needs of future generations and this is included in The Local Government Act 2002 : Sections 10, 14 and 101.

In addition, under the **NZ Coastal Policy Statement** we must consider at least a 100 year time frame for this planning, and current flood maps show the St Vincent St area under water, and SH6 under threat within the timeframe. The document mentions that more is now known of ‘how climate change will affect its infrastructure’ (P.9). At present, the public does not have the information to decide which package would provide the most resilience to sea level rise. We strongly advise the NCC and NZTA discuss with the public the cost-benefit analysis and potential long-term consequences of building a new sea wall along Rocks Road, as well as the long-term packages. Building a new sea wall along Rocks Road will be carbon intensive. Any costly infrastructure we build now will have long term consequences on what we protect and what we retreat from as the rate of sea-level rise accelerates and is likely to have large ongoing maintenance costs. This should be part of the Dynamic Adaptive Pathways Planning process that the NCC is undertaking, with full community participation. Additionally, NCC has not canvassed the public about a long-term strategy for adaptation to climate change, in particular, flooding and sea level rise, of which this transport infrastructure is key and is likely to have an effect on the amount and spatial distribution of the traffic coming into the city.

The three long-term packages are also in our view, **not consistent** with the **Safety and Environment Strategic Directions of the 2018 Government Policy Statement**. All options are likely to maintain or increase vehicle travel, not address existing safety issues (particularly for active modes) nor promote modal shift to reduce emissions. Only the Short-term Package seems to address these Strategic Directions. We also note that emission reduction, modal shift, health and safety of the draft Government Policy Statement on land transport 2021, are likely to be given more priority, including the CCRAA.

Any widening or adding new roads needs careful consideration on the impacts to the communities they dissect. All long-term options will further sever these communities and are likely to increase barriers for kids walking, cycling and scootering to school, particularly in the morning which coincide with morning peak hour traffic. The perverse outcome is likely to maintain or increase the number of kids transported to school by private car. This is not consistent with policies of NCC and NZTA. We note NCC has a program to support active transport to and from schools. These routes already have significant safety challenges and are difficult to cross on foot, two wheels or in a mobility scooter. The Inland route would also remove one of the safest, most used active transport paths.

We have large concerns about the health implications of particularly the Inland Route and also of the other packages as they would increase particulate matter pollution. In its 2004 decision the Environment Court said **“We conclude as a fact that people living in this portion of the valley are already highly susceptible to adverse health effects of poor air quality and will remain so with the current proposition for the Southern Link”** (p.43). Air pollution has improved but increasing vehicles will undo some of this, particularly with PM 2.4, which are now known to cause significant adverse health effects. Furthering inequality with infrastructure should not happen today and we note that communities along Waimea and Tahunahui roads are also at risk.

We also note in the 2004 Environment Court Decision they were very critical about the lack of investigation of alternatives. In the decision document the court proposed a fourth alternative, ([47] (d) p.15), of intersection and route improvements only for Waimea and Tahunanui and Rocks Roads. These improvements were perceived to have the potential to increase the capacity on these existing two roads. They go on to note the network pinch points to the south in Stoke and Richmond, which adding more capacity through and around Nelson will not change (and is likely to make it worse in our opinion). We would like to see information and a discussion on what improvements could have on the existing routes, what the implications would be on the intersections of both the north and south ends on all proposed routes and how traffic flows could be effective in the wider road networks.

Out of the three long-term packages, three lanes on Waimea road with buses and trade vehicles in the priority lane is the only solution we can support under the following criteria:

- A. If further studies show it is still needed after all other alternatives (i.e., increasing accessibility, convenience and safety of active and public transport and behaviour change) to reduce the number of single-occupant vehicles have been exhausted; and
- B. It also needs to meet safety, emissions reductions, health and local community’s livability tests first, before being accepted as a solution.

We recommend that it is vital that these transport options are developed within a integrated Nelson and Tasman regional strategy that looks at the short and long term options, that take into account the need to rapidly reduce emissions, adapt to climate change, incorporates other risks such as an Earthquake on the Waimea-Flaxmore Fault System, as well as the health and needs of the community and economic activity. There are also overarching but little known factors such as energy descent. **A steep reduction in Energy Return on Energy Invested in petrol and diesel means that we are likely to see a 20-30% reduction in net energy available to the society by 2050.** This puts more importance on the choices of where we use our energy now, as there will be less available in the future. It is anticipated that more people will be using active transport, and the distance travelled by fossil-fuelled vehicles will be reduced significantly. Therefore, to make an informed decision our community needs more detailed information of the relative risks, benefits and costs.

## **Our suggestions for the Short-term Package**

As we stated at the start, we support the short-term package. We have a number of recommendations to make for facilitating more behavioural changes in transport. We have to change our behaviour to meet our obligations under the Zero Carbon Act and adapt to climate change. Instead of spending millions on building new lanes or routes, we recommend NZTA to spend money on the following strategies to halve emissions by 2030.

More incentives can be offered through providing heavily-subsidised E bikes and E cargo bikes to replace fossil-fuel cars or incentivise to leave them in the garage. Cargo bikes allow carrying multiple children and/or shopping. All bus services should become free and the bus fleet should be electrified. On-street car parking should be removed on bus routes to create bus-only lanes during peak hours. To further reduce single-occupant cars, you need to allocate locations where commuters could pick up other commuters.

A safer cycling infrastructure will increase the number of bike/scooter commuters to work and school. Solar-powered LED lights along bike lanes would make biking safer at nights and winter. The infrastructure should be improved so that biking is faster, cheaper, safer, more convenient and enjoyable than driving a car. **Cars (emitters) should give way to cyclists (non-emitters).** Drivers who hit cyclists/pedestrians should be heavily penalised like in the Netherlands.

Public campaigns need to be launched to educate the negative impact of cars on the planet and health, and promote active transport instead. Regular cardiovascular exercises can reduce obesity, and the risks from heart diseases, high blood pressure and diabetes. Active transport can reduce the mortality rate from diseases and viruses, like COVID-19, as people are more likely to die if they have had at least one of the above-mentioned non-communicable diseases. Cleaner air will also reduce the impact of diseases such as COVID-19, because a reduction in particulate matter from cars will reduce lung diseases. We run seminars on promoting active transport to reduce transport emissions.

We hope that you will take New Zealand's responsibility to drastically reduce emissions more seriously, reconsider your long-term options and introduce short-term strategies to urgently facilitate behavioral changes in transport.

Thank you for your consideration.

Zero Carbon Nelson Tasman

Contact person: Yuki Fukuda [yuki@snowparrot.co.nz](mailto:yuki@snowparrot.co.nz) 027 390 3951