

From: Environment Canterbury
Sent: Tuesday, 29 March 2022 9:47 pm
To: Have your Say
Subject: Submission on draft Annual Plan 2022/23

Anonymous User just submitted 'Draft Annual Plan 2022/23 submission' with the responses below.

First name

Glenn

Last name

Boyle

Email address

Suburb

Saint Martins, Christchurch

Phone number

Are you submitting on behalf of an organisation?

No, I'm submitting as an individual

Do you wish to speak to your submission at a Council hearing?

No

Any other comments on Environment Canterbury's draft Annual Plan or other matters?

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From: [Glenn Boyle](#)
To: [Have your Say](#)
Subject: Annual Plan Submission
Date: Tuesday, March 8, 2022 4:35:30 PM
Attachments: [ECan_2022.pdf](#)

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Submission attached.

'The only secure basis for oligarchy is
collectivism.' (George Orwell)

Glenn Boyle

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This submission primarily concerns the proposed changes to bus fare structure. The stated objectives of this proposal are “to encourage more people to use the bus to get around” and thus to “help reduce congestion on our roads and emissions from transport.”

1.1 Will the proposed fare changes result in substitution from cars to buses?

Ever since the development of the private motor car in the early 20th century, the overwhelming majority of people have repeatedly shown that, all else equal, they prefer the comfort, convenience, speed and flexibility of that form of transport. By contrast, buses are slow, time-consuming, inconvenient and uncomfortable, to be used in only the direst of circumstances. Of course, in some places, population bulk and the resultant congestion have meant that all else is very definitely not equal and many people opt for public transport, including buses. But that is very much a second-best choice enforced by circumstances. And Christchurch is, despite the CCC’s best efforts to drive out motorists, emphatically not one of those places where such circumstances exist.

Given all this, the presumption that making bus fares marginally cheaper to some groups (that are already disproportionate users of buses) would result in significantly higher patronage appears hugely optimistic and is justified by faith alone. In fact, a predictable outcome is that a significant proportion of those who would switch to buses are the current walkers and cyclists, which would certainly be an own goal; car users’ demands are very unlikely to be sensitive to the proposed changes.

ECan has a long and inglorious history of predicting increased bus patronage that never materialises. But as Einstein famously pointed out, the definition of insanity is to keep doing the same thing and expecting a different result. Painting an old Holden red does not turn it into a Ferrari, and subsidising bus fares for some (at great expense to ratepayers) will not make buses an attractive alternative to cars overall.

1.2 Will the proposed fare changes reduce congestion and lower carbon emissions?

If, as suggested above, the proposed fare changes result in little or no substitution from cars to buses, the answer to this question is obviously ‘no’. Also, the desire to reduce congestion seems an odd one, since success in this area would simply encourage motorists to use their cars more.

So for the sake of argument, let’s focus on emissions and assume that the proposed fare changes do indeed induce a significant migration from cars to buses. That will certainly lower Canterbury transport emissions — *but transport is in the binding-cap ETS and so basic arithmetic ensures there will be no impact at all on total NZ emissions*. All that will happen is that the released carbon credits will be snapped up by other (possibly less desirable) emitters and the net effect will be exactly zero. True, Canterbury emissions may fall (temporarily), but exporting one’s carbon sins to other regions is hardly an ethical policy.

1.3 Conclusion on proposed bus fare changes

The proposed change to bus fares is ill-conceived. It is a policy that will create plenty of wallet pain for ratepayers in exchange for no emissions gain. At best, it provides a subsidy to a small and favoured group of ratepayers at significant cost to the vast majority. It should be binned.

2. Proposed climate change levy

It is difficult to comment on this when no indication is given of the likely size of any such levy. However, at least a couple of suggested uses for levy funds are concerning:

- “reduce transport emissions... (by) encouraging people to walk, bike or use public transport”

As explained above, reducing transport emissions has no effect on total emissions, which is the metric one should be concerned about.

- “plant forests”

This is already fully incentivised by the ETS (some argue too much so), so would at best involve reinventing the wheel.

Christchurch,
8 March 2022