

24 March 2021

Climate Change Commission
Attn: Submissions analysis team
PO Box 24448
Wellington 6142

CLIMATE CHANGE COMMISSION 2021 DRAFT ADVICE FOR CONSULTATION

Kāpiti Coast District Council (Council) appreciates the opportunity to provide feedback on the 2021 Draft Advice for Consultation.

For responses to the specific questions posed in the consultation document, Council supports the submissions made by Greater Wellington Regional Council, Local Government New Zealand (LGNZ), and Taituarā (formerly known as SOLGM).

Overall, Council supports the recommendations from the Commission, but contends that local government must feature more.

The key messages from this submission are:

- Due to its direct relationship with local communities and businesses, local government has a significant role in promoting and enabling climate change mitigation and adaptation;
- The Commission's draft advice does not appear to acknowledge local government's significant role in this space, which also means that the Commission's recommendations have not fully realised the opportunities available through the use of local government as an implementation partner;
- The proposed carbon budgets are very cautious and incremental, and Council believes deeper cuts are possible as demonstrated through our own organisational emissions reduction journey;
- Council asserts that even further emissions reductions would be possible if the Commission's advice included recommendations to further support local government's implementation role through nationwide policy, further guidance, and additional funding; and
- Council has been surprised to see that the focus of land-use planning has been primarily on agriculture and forestry, seemingly without much acknowledgement of the importance of urban design.

To elaborate on these key messages, Council would like to use this submission as an opportunity to tell the Commission about our own emissions reduction journey in the hopes that this will provide a useful example of the opportunities and challenges local authorities encounter when leading, supporting, and promoting emissions reductions – particularly for a council like ours here on the Kāpiti Coast, which is a growing, provincial District on the edge of a large urban centre.

To set the scene, this submission provides some context on the Kāpiti Coast District and then discusses Council's journey towards organisational and districtwide emissions reductions.

The Kapiti Coast District

As of June 2020, the estimated resident population of the Kāpiti Coast District was 57,000 people. The District has a large population of older residents, a relatively high number of people who are not in the labour force and/or are on fixed incomes, and several areas of high deprivation.¹

The District is not homogenous, however, and there are mixed statistics around key social indicators such as housing, with very high home ownership (fifth highest in the country) and very low rental affordability (the fifth lowest in the country). At the same time, the District continues to attract young families due to the lifestyle and proximity to the Wellington labour market, with those who commute into Wellington for work earning considerably higher incomes than the District average.

The Kāpiti Coast District continues to grow, primarily from new residents relocating to the District from other parts of the Wellington Region. Between 2013 and 2018, the District's population grew at an annual average of 1.8% compared to the 0.8% forecast for the same period. For 2019 and 2020, this level of growth continued at 1.4% and 1.8% respectively.²

In May 2019, Kāpiti Coast District Council declared a climate emergency, announced an aim to achieve corporate carbon neutrality by 2025, and established a Waste Minimisation Taskforce. While these motions were partly in response to local calls for transparency on Council's climate change position, the emergency declaration was also a call to Central Government to provide more support to local authorities for climate change mitigation and adaptation.

The role of the Waste Minimisation Taskforce was to review Council's approach to carrying out its commitments in the Wellington Region Waste Management and Minimisation Plan 2017-2023. While Council has a wide range of waste management and minimisation programmes, it is currently developing a compost programme aimed at reducing biogenic methane emissions from residential food and greenwaste. Additionally, work is in process on the development of an improved resource recovery network.

Council's organisational emissions reduction journey

Council has had a Carbon and Energy Management Plan since 2012 and, under Toitū Envirocare's Carbon reduce scheme, Council carries out an annual emissions inventory. For the 2018/19 financial year, Council operations emitted gross 2,867 tCO₂e, down 77% since 2009/10. This compares to its goal of reducing emissions by 80% by 2021/22 (compared to the 2009/10 baseline year).

The Council has received a number of awards over the past 10 years for its emissions reduction focus and achievements, from the Ministry for the Environment, EECA and Toitū Envirocare. The most recent award was the 'Excellence in Climate Action' award received from Toitū Envirocare in late 2019, for Council's achievement in reducing its emissions so substantially over the previous 9 years.

¹ According to the 2018 Census, the median age in the Kāpiti Coast District is 47.9 which is 2% higher than it was in 2013; 40% of residents are not in the labour force compared to 31% nationally; estimates suggest close to 40% receive income from New Zealand superannuation or Work and Income, compared to approximately 25% in the wider Wellington Region; and the median income is the 2nd lowest in the Wellington region (\$29,700 compared to \$36,100 for the entire region).

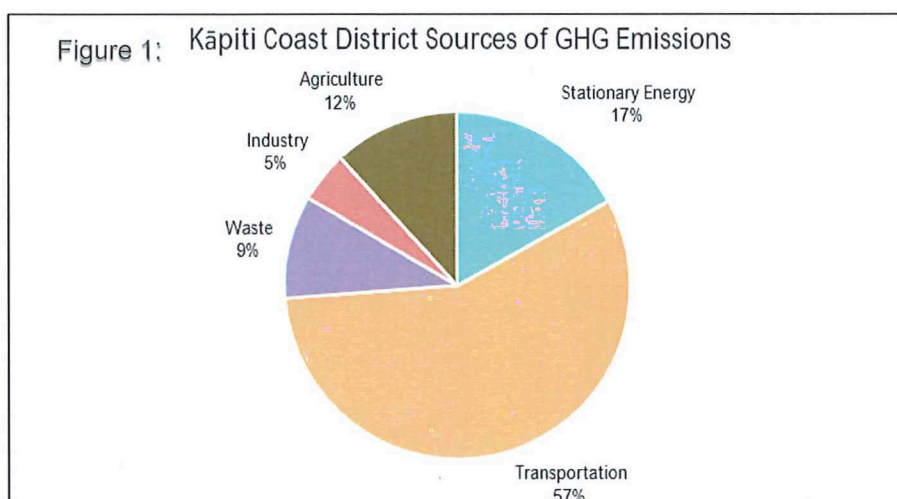
² Statistics New Zealand's provisional residential population estimates.

These reductions were achieved through a range of actions, including energy conservation, waste reduction, fuel switching from fossil fuels to wood pellets and electricity, and some direct use of renewable energy. Council is proud of this achievement, which shows that solid commitment can lead to substantial emissions reductions in a relatively short period of time.

Because our Council has been so successful in the reduction of its corporate emissions, Council contends that it is possible to meet the national targets even faster than the Commission has proposed.

The District's emissions reduction journey

While Council's Carbon and Energy Management Plan focuses primarily on organisational emissions, districtwide emissions are monitored as well. Greenhouse gas inventory reports tell us that 57% of emissions in our District are from transportation, with the majority of this being from light vehicles (Figure 1, Table 1). From 2001 to 2019, districtwide transport emissions increased by 40%, and according to the 2018 Census, 67.6% of employed residents continue to travel to work by car, truck or van.³



Source: AECOM. 15 May 2020. Kapiti Coast District Greenhouse Gas Inventory.

Table 1: Kāpiti Coast District Summary of Transport Gross Emissions			
Sector sub-category	tCO ₂ e	% Gross	% Sector
Petrol	90,302	25.7%	45.2%
Diesel	57,638	16.4%	28.9%
Rail Emissions	233	0.1%	0.1%
Bus (Electric)	11	0.0%	0.0%
Jet Kerosene	31,019	8.8%	15.5%
Av Gas	59	0.0%	0.0%
Marine Diesel	16,708	4.8%	8.4%
Light Fuel Oil	3,529	1.0%	1.8%
LPG	275	0.1%	0.1%
Total:	199,773	56.9%	100.0%

Source: AECOM. 15 May 2020. Kapiti Coast District Greenhouse Gas Inventory.

³ Source: 2018 Census. Main means of travel to work by age group and sex, for the employed usual resident population aged 15 years and above. The results for private vehicle, company vehicle, and passenger have been combined.

This data tells us that a shift away from fossil fuel vehicles is the most important thing needed to reduce emissions across the the Kāpiti Coast District.

Council has a wide range of projects that seek to encourage this shift towards greener transport. For example, some of the initiatives Council has undertaken, and will continue to undertake, include:

- The development of an extensive network of shared cycleways and walkways through the Stride 'n' Ride Kāpiti Coast programme,
- The placement of EV charging stations at strategic locations across the District,
- Increased numbers of EV vehicles in the Council fleet,
- Physical works across the roading network to improve bike and pedestrian safety,
- A recent review of our Speed Limit Bylaw,
- A suite of educational programmes through schools, libraries, and community centres to support bike and pedestrian safety, and
- Participation in regional working groups resulting in outcomes like the Regional Mode Shift Plan for Wellington, which was adopted in August 2020.

Another key aspect of a green transport network is an efficient and effective public transportation system, but Council has very limited influence in this area because the public transport network is managed by Greater Wellington Regional Council (GWRC).

In order to improve our public transport system, Council actively advocates to GWRC, Waka Kotahi NZ Transport Agency, and the Ministry of Transport. During the past three years, Council has made no less than 10 submission advocating for better public transportation in the District. Specifically, Council made submissions on:

- NZTA's draft Long Term Strategic View;
- GWRC's Fare Review;
- GWRC's Regional Land Transport Plan Mid-term Review;
- GWRC's draft Long Term Plan 2018–2028;
- Ministry of Transport Government Policy Statement (GPS) on Land Transport 2018;
- GWRC's draft Annual Plan 2019/20;
- Ministry of Transport's Road to Zero: Draft Road Safety Strategy 2020–2030;
- Ministry of Transport's Government Policy Statement on Land Transport 2021;
- Ministry of Transport's New Zealand Draft Rail Plan; and
- NZTA Accessible Streets.⁴

Support required

While Council acknowledges that the delivery of public transportation in a large, metropolitan region is challenging, Council's efforts at advocacy and relationship-building with the key public transportation providers has been slow to deliver results. Meanwhile, Council continues to hear from our community that they would like us to do more.⁵

⁴ At the time of writing this submission, Council is currently preparing three more submissions on Waka Kotahi's National Parking Management Guidance, the draft Wellington Regional Land Transport Plan 2021, and the draft Wellington Regional Public Transport Plan 2021. Council will also be reviewing the Traffic Bylaw this year.

⁵ See, for example, this recent opinion piece by Kāpiti resident, Dr Paul Callister. 18 February 2021. Newsroom. *Flawed transport strategy a tick-box exercise.* [Flawed Transport Strategy a Tick-box Exercise | Newsroom](#)

While these public transport providers are aware of the issues in our District, the problem continues to be that the Kāpiti Coast District is a small district on the edge of a large urban centre. Most resources are directed towards the centre, which is struggling with its own transport issues. While there has recently been a review of the Let's Get Wellington Moving programme, the focus on the urban centres is unlikely to address the issues that many New Zealanders are facing in the provinces.

Specific examples of the District's issues with the public transport system and examples of the types of remedies that could be considered are outlined in Table 2 and Table 3.

Table 2: Issues and Potential Remedies for Train Services in the Kāpiti Coast

General Issues

- There are no regular commuter train services north of Waikanae, despite the fact that the northern boundary of the Kāpiti Coast District, which is part of the Greater Wellington Region, extends beyond Waikanae all the way north of Ōtaki.^A
- The lack of trains north of Waikanae means that residents drive south to access these services, thereby putting pressure on the Waikanae Park & Ride facilities.
- The Kapiti Line is not electrified north of Waikanae. Current proposals to improve rail services north of Waikanae are considering the use of diesel-powered trains.

Specific Concerns

- Council would like to see a greater shift from cars to trains, but this is dependent on the availability of an efficient network that makes trains available in the right place at the right time to meet commuter needs.
- As a general principle, any regional rail system should provide equal service across the entire region. Another objective should be to provide regular services between urban centres (e.g. Wellington and Palmerston North).
- To meet New Zealand's emissions targets, the rail network must shift away from the usage of fossil fuels.
- Population forecasts (and the Wellington Regional Growth Plan) project ongoing growth north of Waikanae, which will exacerbate these issues. Moreover, accelerating construction costs mean projects will become more expensive over time.

Potential Remedies

To develop an energy efficient rail network to move people and freight within regions and between urban centres:

- greater investment in the rail network is required;
- new technologies must be explored to determine if there are newer, more cost effective ways to deliver a greener rail network; and
- urban development and land-use planning must consider the placement of residential and business areas in relation to transport hubs.

^A At the moment the only commuter train is the Capital Connection, which travels one-way from Palmerston North to Wellington in the morning and then back again in the evening.

Table 3: Issues and Potential Remedies for Bus Services in the Kāpiti Coast

General Issues

- Bus services north of Waikanae struggle to meet the demands of both commuters and day-time users.^A
- There are no buses from Ōtaki going north towards Levin for residents that must go north to access essential services.^B
- Most of the buses in the Kāpiti Coast District are large diesel buses that often appear to have relatively low passenger occupancy rates.
- More bus shelters are required across the District.
- While bespoke, dial-a-ride services are available in some areas, it is not clear that users are aware of these services or know how to use them.

Specific Concerns

- Council would like to see a greater shift from cars to buses, but this is dependent on an efficient network that makes buses available in the right place at the right time to meet commuter needs.
- As a general principle, any regional bus system should provide equal service across the entire region.
- Another objective should be to provide regular services in both directions to nearby urban areas, even if they cross regional lines (e.g. Ōtaki to Levin).
- To meet New Zealand's emissions targets, the entire bus network must shift away from the usage of fossil fuels.
- Council does recognise that many bus runs have relatively low passenger occupancy rates, which can make it difficult to argue for more frequent services. At the same time, without more frequent services, it will be difficult to increase usage of the public transport network.

Potential Remedies

To develop an energy efficient bus network that will be reliable and heavily used:

- urban development and land-use planning must consider the placement of residential and business areas in relation to transport hubs. This should also consider the location of essential services (e.g. health and other social services, Courts, Police, etc). Because Government service boundaries are not always aligned, it is possible to have residents of one region traveling to another region (which offers a separate bus service) for services. This is the case in Ōtaki where residents fall within the Greater Wellington transport system, but travel into the Horizons region for services. This situation would require (i) interconnected public transport across regions OR (ii) improved alignment with residents' transportation and service providers;
- greater investment in public bus services are required; and

Table 3: Potential Remedies continued

- new technologies and service models must be explored to determine if there are newer, more cost effective ways to deliver a greener bus network, particularly in provincial centres in New Zealand. As an example, Timaru is using smaller mini-buses with the addition of an on-demand capability. This 'MyWay' trial has added a number of 'informal' bus stops to the standard routes which can be requested using the on-demand capability (bookable via smartphone app and landline). This reduces walking distances for passengers; provides improved convenience, particularly for older or access-impaired residents; will produce lower emissions per passenger kilometre; and will hopefully increase patronage.

Note: Council contends that the MyWay trial could be a viable model, despite recent news articles suggesting otherwise. The concerns that are currently being raised about MyWay relate to costs per ratepayer. This does not mean that the service is not working, but rather that the funding model for the service is not working. An effective public transport system that encourages users to switch from private cars to public transport will require more central government funding. The Automobile Association's findings in its 2008 report entitled *A Comparative Assessment of Five National Transport Strategies/Plans* found that all of the nations assessed in comparison 'had higher levels of public transport investment in their cities than New Zealand'. While New Zealand has increased its transport investment since that time, the basic premise still holds true – an effective public transport system requires considerable central government investment. A funding model based on user pays and rates will never allow for the transport systems we need in New Zealand, particularly to meet our emissions reductions goals.

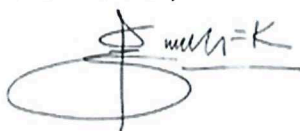
^A In response to requests for more buses at peak hours, buses were redirected from midday runs (which are important for older residents and school students) which has meant that no additional services were provided and some residents were then disadvantaged by the reduction in midday runs.

^B At the moment there is a trial bus that travels Levin-to-Paraparaumu in the morning and then Paraparaumu-to-Levin in the afternoon. While this assists some travellers, it does not assist those that wish to travel north in the morning and return south in the afternoon or evening.

Local government has an important role in helping Aotearoa meet its targets but, as the Kāpiti Coast District emissions reduction journey demonstrates, further work is required to enhance local government's ability to promote and enable climate change mitigation. Council would like to see the Commission give further consideration to recommendations that will ensure local government is well positioned as an implementation partner.

Thank you once again for the opportunity to submit on the 2021 Draft Advice for Consultation. We would be pleased to speak to our submission if there is an opportunity to do so.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'K. Gurunathan', written over a horizontal line.

K. Gurunathan JP, MA
MAYOR, KĀPITI COAST DISTRICT