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Climate Change Commission
Wellington

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Consultation response: 2023 draft advice to inform the strategic direction of the government's second emissions reduction plan.

Kāpiti Coast District Council (Council) welcomes the opportunity to submit a response to the Climate Change Commission's (the Commission) *2023 draft advice to inform the strategic direction of the government's second emissions reduction plan*. Our Council recognises the importance of accelerating efforts to achieve significant greenhouse gas emissions through second emissions reduction plan and is committed to continue working with government to help New Zealanders transition to a low-emissions future.

Our Council broadly support the direction of travel and proposed recommendations set out in the Commission's draft advice. However, we are disappointed that while your draft clearly states the role of central government, there is very little detail on the role of local government. We raise specific issues around recommendations 6, 9B, 10, 13, 16, 18 and Part 3. We also propose four additional recommendations to strengthen the implementation and effectiveness of the Commission's proposed plan actions. For continuity, our submission builds on our previous submissions and climate action to date, however, we would like to emphasise:

- The important role that local government has in implementing climate change activity and in helping Aotearoa/New Zealand to meet its emission reduction targets, and
- The immediate requirement for necessary additional funding, outside of rates revenues, to be allocated to local government to enable more action and support for local communities and the transition that is required.

We are concerned that legislative change is not factoring in the implementation impacts for local government, and communities. It is not reasonable to expect local rate payers to fully fund necessary changes in isolation of wider government direction – this is not about central government agencies needing to get involved in local activity, but about redirecting funding to where it can be best utilised. Of note, our Council is already taking serious steps to recognise the impacts of climate change, as the Kāpiti Coast District is on the west coast of Aotearoa/New Zealand; and ensure that we are coordinating local efforts. To that end, in 2019 we declared a climate emergency for the Kāpiti Coast District and shortly after adopted

a climate emergency action framework to guide our plans for helping our communities, businesses, and iwi to reduce emissions and adapt to the threat of climate change. We have also provided submissions on the consultation for the Government's first emissions reduction plan (24 November 2021) and to the Commission's advice note informing that emissions reduction plan (24 March 2021). Since then, our Council have announced a new climate action grants scheme for community emission reduction projects, extended our cycle expressway from Peka-Peka to Otaki, put in place measures to further reduce our corporate emissions, and to set emission reductions targets by the end of this year. We are currently developing a climate change and resilience strategy to direct the focus of community and key stakeholder effort to achieve more coordinated action and future commitments, including a District-wide emissions reduction goal, and our response to severe weather events and natural disasters; this will be consulted on with our communities and neighbouring authorities in early 2024. We also have a community engagement process underway to gain agreement on coastal adaptation pathways, which is due to be completed in mid-2024; and will shortly progress a district plan change for coastal risk hazard to ensure improved land use planning in coastal areas.

Our submission is structured in general response to each of the three 'Parts' of the Commission's proposed recommendations (attached in full at Appendix 1 for reference). At the end of our submission, we set out comments specifically proposed recommendations that we have concerns about.

Further, our Council notes support for the submissions made by the Greater Wellington Regional Council (see Appendix 2), other Wellington region councils, and Local Government New Zealand.

Our Council would be pleased to speak to our submissions if there is an opportunity to do so.

Yours sincerely



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Appendix 1: Kāpiti Coast District Council submission to *Climate Change Commission: 2023 draft advice to inform the strategic direction of the government's second emissions reduction plan*

Our Council's comments and recommendations are set out below.

Part 1: Fundamentals for success

Recognising local government's role:

Neither the Commissions' draft advice or the government's first emissions reduction plan recognises the significant role that local government plays as an enabler and regulator for achieving Aotearoa/New Zealand's emission reduction targets. This needs to be addressed.

The government in undertaking its extensive future resource management system and regulatory reform, needs to present a clear and coherent framework for local authorities to be an effective implementation partner. More clarity, guidance, and funding for local government implementing the emission reduction plans alongside the multitude of new regulations (including the RMA reforms, National Policy Statement for Urban Design, and National Adaptation Plan) is needed from government to ensure that impactful climate change mitigation and adaptation measures are delivered at the local level.

As our Council set out in its consultation submission on the Natural and Built Environment Bill and the Spatial Planning Bill ([17 February 2023](#), p 6): *"We are concerned that by requiring planning documents to achieve a reduction in greenhouse gas emissions and the removal of gasses from the atmosphere, clause 5b (in the Bill) is setting an unachievable burden on the planning system"*. Council again calls on the government to provide further clarification and guidance about what the *"achieve"* directive means for councils and how this could practically be funded, implemented, monitored, and enforced.

Kāpiti Coast District Council, Recommendation 1:

The government's second emission plan should recognise the significant role that local government plays in helping to achieve emissions reductions. Government should:

- **clarify in its new regulatory tools the decision-making powers available to local authorities to support discharging its role, and**
- **commit funding to local government for delivering emission reductions through the land use planning process.**

Part 2: Creating low emission options.

A) Targeted funding and support:

Council supports the Commission's recommendations 16-18 to increase funding to optimise integrated transport, remove barriers to electric vehicle charging installation, and to develop incentives for low emission commercial vehicles.

Transportation is Kāpiti Coast Districts largest climate polluting sector at 57% of total emissions. Whilst Councils welcomes the government's plans to extend the Kāpiti line

commuter network from Waikanae to Levin, Kāpiti commuters won't see those trains for at least 5-6 years. Funding is needed in the interim to increase Kāpiti's bus provision (regional and local) and infrastructure (more sheltered bus stops), and to extend lighting infrastructure along the cycle expressway.

Our Council is concerned that the Commission's proposed recommendations do not provide clarity on who will benefit from the additional funding; how much will be available; and when it will be available. Kāpiti Coast District residents urgently need more viable active and public transport alternatives to encourage people to mode shift and significantly reduce emissions from transport.

Kāpiti Coast District Council, Recommendation 2:

The government second emissions reduction plan should provide clarity on how much funding will be available and when for local authorities, communities, business, and iwi to deliver emission reduction projects. Priority should be given to active and public transport projects.

B) Large polluters leading by example:

Central, regional, and local government can only go so far for achieving emissions reduction plan targets. More active and decisive leadership from Aotearoa/New Zealand's biggest polluters is needed to drive significant emission reductions and innovation.

New Zealanders should not have to pick up the tab for emission reduction measures made by multi-national corporations as in the government's recent decision to support [NZ Steel emissions reduction project](#). At the same time government has [slashed \\$800m from the Budget 2023 Climate Fund](#). The government should reverse this budget decision and focus funding and support for small and medium sized businesses and regular New Zealanders to affordably and effectively decarbonise their workplaces, homes, and transport activities.

The Emission Trading Scheme should be reviewed and improved to ensure there are stronger penalties for industries, with the biggest polluters, who are not reasonably reducing emissions. If we want to see real change, we must focus on the biggest areas for gain rather than around the margins.

Kāpiti Coast District Council, Recommendation 3:

The government's second emissions reduction plan should call on Aotearoa/New Zealand's largest carbon polluters to significantly decarbonise their activities at no cost to the taxpayer.

Kāpiti Coast District Council, Recommendation 4:

The government's second emissions reduction plan should increase funding and support for small and medium sized businesses and for citizens to effectively decarbonise their workplaces, homes, and transport activities.

Part 3: Enabling systems transformation.

Accelerating to a low-carbon circular economy:

The Commission provides no proposed recommendations in *Part 3: Enabling systems transformation* of its advice note. This is a missed opportunity to accelerate transition to a low carbon circular economy achieved by reducing emissions from products and services produced overseas but consumed in New Zealand (consumption-based emissions) as set out in Chapter 15 of the Commission's advice note. New Zealand's consumption-based emissions were estimated at 57.4 million tonnes in 2020¹. The emissions reduction plan only deals with direct and indirect emissions (scope 1 and 2 emissions) produced within Aotearoa's national boundary estimated at 46.64 million tonnes in 2022².

To achieve significant emission reductions, the government should accelerate its work to help New Zealanders reduce consumption-based emissions through increased levels of reuse, repair, share, recycle, and accelerate work to establish a baseline and common framework for reporting consumption-based emissions that can be incorporated into future emissions reduction plans. A successful and just transition to low carbon-circular lifestyles is dependent on winning the hearts and minds of New Zealanders to make low carbon choices, alongside the government's focus to date on the physical infrastructure needed.

Our Council is introducing tools to support adopting a circular economy approach as we develop our climate change and resilience strategy. Presently, the region is proud to host several community projects including [Zero waste hubs](#), [repair cafes](#), [Menzshed](#), and [Kaibosch Food Rescue](#) that help local businesses and citizens to cut waste and consumption based emissions by keeping food, products, and other materials in use for longer.

Recommendation 4:

The Commission should include proposed recommendations in line with its draft advice set out in *Chapter 15 Circular Economy and Bioeconomy*. For reference this is summarised on page 170: "Our draft advice in this chapter focuses on putting in place the necessary fundamentals (for transition), including the need to':

- *address consumption-based emissions*
- *enshrine the consideration of the waste hierarchy within central and local government decision-making requirements*
- *realise the role of product stewardship for designing out and reducing the emissions from waste.*
- *commit to the biomass strategic use assessment and strategy*
- *address the bioeconomy information gap through education, government procurement, and setting standards".*

¹ [Greenhouse gas emissions \(consumption-based\): Year ended 2020 \(provisional\) | Stats NZ](#)

² Climate Change Commission draft advice note informing the strategic direction of the government's second emissions reduction plan (page 20), April 2023.

Council comments on specific Commission proposed recommendations

Proposed recommendation	Council comment
<p>6. <i>“Enable a fair, inclusive, and equitable transition for New Zealanders by expanding the scope of the Equitable Transitions Strategy to include compounding impacts of climate change and adaptation as well as mitigation”.</i></p>	<p>This is only useful if a climate change and adaptation fund is established to support the required steps taken by New Zealanders. Council in its 27 February 2023 submission to the Independent Review Panel: Future for Local Government consultation supported that a fund for local government be established to support their communities to transition and adapt to climate change. Central government action or intervention is not needed, the flow of tax revenue funds just needs to improve between local and central government.</p>
<p>9b. <i>“Advance the agricultural emissions pricing system to incentivise gross emissions reductions in line with the 2050 target”.</i></p>	<p>Council supports however more detail is needed on how this will be achieved, including budget and the legislative levers available. Further to this, the perceived implications from the agriculture community re this action reducing their competitive advantage on the international market needs to be addressed. New Zealand could be doing more in trade relationships to ensure other countries expect similar action from their agricultural sectors.</p>
<p>10. <i>“Implement an integrated planning system that builds urban areas upward and mixes uses while incrementally reducing climate risk”..</i></p>	<p>Council does not support this recommendation, as currently stated. Cyclone Gabrielle and other recent flooding events in the North Island have highlighted the risks and devastation of high-density housing in flood-affected urban areas. Building up is not always best, if it is in the wrong place in the first instance. Our Council takes a more balanced view on how to best tackle climate change whilst meeting increased demand on housing demand. Our Council acknowledges the climate change mitigation benefits (i.e. reduced transport-generated carbon emissions) of locating people close to services and rapid transit stops. In practice some existing urban locations overlap with areas either at significant risk or projected as a result of climate change to become at significant risk from natural hazards such as</p>

Proposed recommendation	Council comment
	flooding and coastal erosion. In these situations Council considers that a range of urban build responses need to be considered by communities, some of which may not be considered "incremental" - including managed retreat. Responses need to be considered by communities, some of which may not be considered "incremental" - including managed retreat.
<p>13. <i>“Prioritise and accelerate renewable electricity generation build and ensure electricity distribution networks can support growth and variability of demand and supply”.</i></p>	<p>Stronger government direction via legislation is needed for this to work, for example, requiring solar panel installations on all new builds, unless they are already serviced by local solar or other local renewable electricity generation. Our Council has attempted to introduce solar panel requirements to a key development area within our District through our District Plan but have found that application for resource consents to avoid doing so have been submitted by developers. Given pressure on electricity generation, directives need to be set in legislation to provide greater power at a local level.</p>
<p>16. <i>“...For major population centres, the Government should also complete cycleway networks by 2030 and take steps to complete rapid transport networks by 2035.”</i></p>	<p>Council supports however a clear funding plan and commitment is needed. This includes through regional government. There is no point in setting emissions reduction targets at national and regional level if the funding required to implement is not also committed. Affordable, available, and reliable public transport is a disincentive for public transport use.</p>
<p>18. <i>“Develop incentives to accelerate the uptake of zero emissions commercial vehicles, including vans, utes, and trucks.”</i></p>	<p>Council supports this as commercial road transport (instead of by train) is a large contributor to transport emissions. The target published as part of the first ERP (35% emissions reduction from freight transport by 2035) should be supported by visible measures from Waka Kotahi. For example, extend the Clean Car Discount scheme to include commercial vehicles. Tax incentives could also be implemented</p>

Proposed recommendation	Council comment
	to support use of hybrid and lower emission vehicles and tools.
<p>Part 3 Enabling systems transition (no recommendations provided).</p>	<p>Central government should be called on to commit funding to local government to help their local communities effectively transition to low carbon lifestyles. This could include direction for more directive development control policy on climate change costing. Council in its 1 June submission on NPS for Renewable Energy Generation recommended that local communities should directly benefit from contributing to a system transition as often they bear a disproportionate cost from local renewable energy projects.</p>

Appendix 2: Greater Wellington Regional Council submission

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June 20, 2023

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Tēnā koutou,

Submission to Draft advice to inform the strategic direction of the Government's second emissions reduction plan

We are writing this submission as a collective of councils³ in the Greater Wellington Region. Overall, we are supportive of most of the draft advice recommendations, but we encourage *He Pou a Rangi - Climate Change Commission* to use its unique position to push for more ambitious action.

The urgency of acting on climate change is now very clear within each of our communities. With every new climate-related disaster event, such as with the recent devastation seen from Cyclone Gabrielle, the imperative to act swiftly and decisively is becoming increasingly pronounced.

As a collective of regional and local councils, we believe it is important that central government policy aligns with the latest science, and we support the role of the Commission in highlighting the evidence-based urgency of the issues we face. We need the Commission to be staunch champions when giving this advice so that an appropriately ambitious level of action can be taken to meet the challenges posed to all our communities.

Climate change mitigation and adaptation is now at the centre of our regional and local government decision making. It is therefore disappointing to note that while your draft advice clearly states the role of central government, there is very little detail on the role of local government. The regional and local government level is where a significant amount of decarbonising work is being done. Several Councils in our region already have climate change strategies in place for their operations and to support their residents to transition. As a region, we are committed to creating zero-carbon communities with the built and social infrastructure that meets our needs and aspirations.

As part of our Regional Emissions Reduction Strategy (in development) our collective councils are working with the following draft aspirations.

We believe that a flourishing, zero-carbon region has:

- informed leadership who are honest about the scale of the crisis, willing to make tough decisions at pace and committed to bringing the community along on the journey.
- communities that are engaged and mobilised to live a low-carbon lifestyle, and have access to the knowledge, tools, and infrastructure needed to thrive. They are empowered to take urgent action now that will lead to a better quality of life.
- to move with scale and pace to reduce emissions in ways which restore and enhance our unique natural and cultural taiao (environment).

³ Excluding Porirua City Council

- businesses, local and central government, developers, and primary industry sectors with the skills, products, and assets needed to help build an environmentally sustainable economy.
- shared climate action goals that will make immediate impact coupled with longer-term goals that will enable intergenerational change. A recognition that regional success is underpinned by local city and district action.
- sustainable prosperity that supports vulnerable communities and reduces inequality.

To create this flourishing, zero-carbon region we need central government to help address the barriers to electrifying energy supply, significantly increase public transport infrastructure, and create climate friendly urban form. We also need central government to ensure that the right frameworks are in place that follow tikanga Māori and respect Te Tiriti o Waitangi, with funding available to support mana whenua involvement.

With this in mind, we would like to see the following come through strongly in the government's second emissions reduction plan:

- A commitment to be upfront with the public about the scale of the response required, communicating regularly about the challenges, and bringing the community along on the journey.
- Investment in tactical on-the-ground education and support for communities, business, and mana whenua to shift their practices as the systems shift and more options become available.
- Funding to support a Māori-led approach to an equitable transition for Iwi/Māori and the Māori economy.
- A significant increase in investment to transform the transport sector, as well as the supporting policy positions. For example, Wales has committed to only investing in roading projects that improve active and public transport.
- Investing in the energy system to enable the shift away from fossil-fuel based energy sources, including petrol, diesel, and fossil gas to electricity.
- Start the conversation now on which sources of emissions in which sectors are going to be the hardest to remove from our economy, to give clarity to business on which sectors will need to remove fossil fuel consumption from their business models by 2050.
- Make sure all new policy positions from all parts of govt align with the emissions reduction plan, and do not undermine the achievement of carbon budgets.
- A willingness to make tough decisions at pace in recognition of the climate emergency declared by Aotearoa in 2019.
- Maintained commitment to a fair, inclusive, and equitable transition, including specific policy addressing the intersection between disability, accessibility, and climate action.

In summary, as regional and local councils we need the Commission's advice to highlight the importance of central government support to enable local government to respond to climate change and reduce emissions in their local communities. We look forward to seeing, in the government's second emissions reduction plan, greater clarity, funding and targeted regulation to support local government to locally act on the national climate change response.

Nāku noa, nā,



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