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Ministry for the Environment  
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## TE HAU MĀROHI KI ANAMATA: TRANSITIONING TO A LOW-EMISSIONS AND CLIMATE-RESILIENT FUTURE

Kāpiti Coast District Council (Council) appreciates the opportunity to submit on *Te hau mārohi ki anamata* | *Transitioning to a low-emissions and climate-resilient future*. Council recognises the importance of New Zealand's first emissions reduction plan and is committed to working alongside all New Zealanders to achieve a low-emissions future.

Council is proud to have been the first local authority to be CEMARS certified in 2012.<sup>1</sup> Council has reduced its greenhouse gas emissions by 78% since 2010, and received numerous awards for these efforts, including being named top carbon reducer in Toitū Envirocare's 2020 rankings.

During this same time, Council has also funded a wide range of projects to support and enable districtwide emissions reductions. Despite these efforts, however, net emissions for the Kāpiti Coast District rose by 43%, from net 200,801 tCO<sub>2</sub>e in 2001 to net 286,560 tCO<sub>2</sub>e in 2019.<sup>2</sup> While agriculture, stationary energy and waste emissions reduced (by 41%, 8% and 4% respectively), transport and industry emissions increased (by 40% and 445% respectively). The increase in transport emissions was the largest real change in emissions, rising by 57,059 tCO<sub>2</sub>e. This is discussed further in the section on transport.

Our submission draws on the lessons we have learnt to, not only respond to the questions posed in the consultation document, but to also (i) provide examples illustrating how organisations like ours can successfully reduce their corporate emissions and (ii) suggest a number of actions central government can take to support local government in encouraging emissions reductions at the local level.

Council contends that local government has an important role in helping Aotearoa meet its targets, but further support and funding from central Government is required to enhance local government's ability to promote and enable mitigation at a local level.

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<sup>1</sup> At the time, CEMARS (Certified Emissions Measurement and Reporting Scheme) was administered by Enviro-Mark Solutions. Today the programme is now called 'CarbonReduce' and the annual auditing is carried out by Toitū Envirocare.

<sup>2</sup> AECOM, 15 May 2020, Kāpiti Coast District Greenhouse Gas Inventory. All districtwide emissions cited in this submission are from this report.

While the *Te hau mārohi ki anamata* consultation document recognises the need to ‘empower central and local government, iwi/Māori, communities and businesses’ (p18), it appears to overlook the opportunities available through the well-established linkages between local government, businesses, and communities. As local government must continuously engage and consult to define and deliver its services, these lines of communication are well formed.

Council supports the submissions made by the Wellington Region Climate Change Forum, the Wellington Region Transport Committee, the WasteMINZ TA Forum, the other Wellington region councils, Local Government New Zealand (LGNZ), and Taituarā.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Gurunathan', written over a horizontal line. The signature is stylized and includes a large circular flourish on the left side.

K. Gurunathan JP, MA  
**MAYOR, KĀPITI COAST DISTRICT**

## Kāpiti Coast District Council submission on *Te hau mārohi ki anamata: Transitioning to a low-emissions and climate-resilient future*

1. Our submission is structured according to the headings and sub-headings from each section of the consultation document. While our response aims to speak to the questions in the consultation document, we have not answered every question posed.

### Meeting the net-zero challenge

#### Transition pathway / Helping sectors to adapt

- *Do you agree that the emissions reduction plan should be guided by a set of principles? If so, are the five principles set out above, the correct ones? Please explain why or why not.*
  - *How can we enable further private sector action to reduce emissions and help achieve a productive, sustainable and inclusive economy? In particular, what key barriers could we remove to support decarbonisation?*
  - *In addition to the actions already committed to and the proposed actions in this document, what further measures could be used to help close the gap?*
  - *How can the emissions reduction plan promote nature-based solutions that are good for both climate and biodiversity?*
  - *Are there any other views you wish to share in relation to the Transition Pathway?*
  - *Which actions to reduce emissions can also best improve our ability to adapt to the effects of climate change?*
  - *Which actions to reduce emissions could increase future risks and impacts of climate change, and therefore need to be avoided?*
2. On 29 July 2021, Kāpiti Coast District Council adopted a Climate Action Framework (as shown in Appendix 1 to this submission). Like the guiding principles proposed in *Te hau mārohi ki anamata*, the Framework's primary objective is to embed considerations of climate change across the organisation and guide Council decision-making.
  3. Our Climate Action Framework consists of 10 principles.<sup>3</sup> A comparison between our Framework and those proposed in *Te hau mārohi ki anamata* shows considerable overlap but there is, however, one principle that sits within our Framework that does not sit in the guiding principles for the emissions reduction plan – i.e., *sustainability, resilience, and climate change-related work is integrated and coordinated across Council*.
  4. In response to the question about how Government can enable further private sector action, this additional principle is important because **one of the most important steps that Government can take is to support local government bodies, who in turn support local communities and businesses, and one of the best ways to do this is to increase alignment across Government**. Because today's New Zealand faces a wide range of challenges – the

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<sup>3</sup> Note that our Framework covers both mitigation and adaptation and some of the principles are only appropriate for local government bodies.

changing climate, the COVID-19 pandemic, and the affordable housing crisis, to name but a few – it is critically important that Government be integrated and coordinated. Council acknowledges this is not an easy task.

5. Local government bodies can easily become caught between conflicting mandates, which has flow on effects to local communities and businesses. A perfect example is the recently announced Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill. While this Bill is projected to increase much-needed housing supply, it creates additional challenges for local government bodies. As an example, because transport emissions are by far the greatest source of emissions in the Kāpiti Coast, housing intensification along key public transport nodes is critical for emissions reductions in this District, whereas this Bill is designed to permit intensification broadly across all urban areas. This is particularly problematic for Council because in some instances we do not want to encourage intensification in areas that are not close to key transport nodes.
6. While Council acknowledges the need for affordable housing in the District, it is important that new builds do not further exacerbate the challenges we face. As many of our existing neighbourhoods were built without consideration to low-emissions living, we do not want to add to those developments without addressing greenhouse gas emissions, environmental quality, and risk and resilience at the same time. Two principles of our Framework that speak to this are:
  - a. Avoiding any actions that might worsen inequity or compromise future generations; and
  - b. Long-term effectiveness of proposed actions, regardless of current or future trends or pressures.
7. The National Policy Statement on Urban Development 2020 and the Wellington Regional Growth Framework acknowledge this need to intensify housing at public transport nodes. Our proposed approach to enabling growth has suggested a more nuanced approach to where and how development should occur, and this has now been partly overridden by the Bill. If New Zealand is to reach its emissions reduction targets, a fully aligned, whole-of-Government response is required.

#### **Working with our Tiriti partners**

- *The Climate Change Commission has recommended that the Government and iwi/Māori partner on a series of national plans and strategies to decarbonise our economy. Which, if any, of the strategies listed are a particular priority for your whānau, hapū or iwi and why is this?*
- *What actions should a Māori-led transition strategy prioritise? What impact do you think these actions will have for Māori generally or for our emission reduction targets? What impact will these actions have for you?*
- *What would help your whanau, community, Māori collective or business to participate in the development of the strategy?*

- *What information would your Māori collective, community or business like to capture in an emissions profile? Could this information support emissions reductions at a whanau level?*
  - *Reflecting on the Commission's recommendation for a mechanism that would build strong Te Tiriti partnerships, what existing models of partnership are you aware of that have resulted in good outcomes for Māori? Why were they effective?*
8. As the questions in this section are specifically directed towards Te Tiriti partners, Council has shared *Te hau mārohi ki anamata* with our Iwi Relationships Team so they could ensure that our iwi partners were aware of this consultation opportunity. Council supports all submissions made by the iwi and hapū of the Kāpiti Coast District.

### **Making an equitable transition**

- *Do you agree with the objectives for an Equitable Transitions Strategy as set out by the Climate Change Commission (partnership with iwi/Māori, proactive transition planning, strengthening the responsiveness of the education systems, supporting workers in transition, and minimising unequal impacts)? What additional objectives should be included?*
  - *What additional measures are needed to give effect to the objectives noted by the Climate Change Commission and any other objectives that you think should be included in an Equitable Transitions Strategy?*
  - *What models and approaches should be used in developing an Equitable Transitions Strategy to ensure that it incorporates and effectively responds to the perspectives and priorities of different groups?*
  - *How can Government further support households (particularly low-income households) to reduce their emissions footprint?*
  - *How can Government further support workers at threat of displacement to develop new skills and find good jobs with minimal disruption?*
  - *What additional resources, tools and information are needed to support community transition planning?*
  - *How could the uptake of low-emissions business models and production methods be best encouraged?*
  - *Is there anything else you wish to share in relation to making an equitable transition?*
9. In principle, Council supports the objectives for an Equitable Transitions Strategy as set out by the Climate Change Commission and agrees that such a strategy must be co-designed alongside iwi/Māori, local government, regional economic development agencies, businesses, workers, unions, the disability community, and community groups.
10. As time is of the essence to develop and implement the Equitable Transitions Strategy, Government should not overlook the well-established linkages between local government, businesses, and communities. As local government must continuously engage, consult, and collaborate to define and deliver its services, local government bodies are very well placed to serve as partners in the co-design process.

11. Council notes that the four focus areas for the transition are reducing risks for firms and households; promoting business and job opportunities; supporting workers, households, and communities through the transition; and monitoring impacts and responding as they emerge. Due to the focus on local businesses and communities, local government also has an important role to play in the implementation of the strategy, although additional funding from central Government will be required so this can happen.
12. Additional funding and support is also required to enhance local government’s ability to promote and enable mitigation at a local level. The Kāpiti Coast districtwide emissions reduction experience illustrates this point. In the Kāpiti Coast, the largest contributor to the districtwide emissions inventory in 2019 was transport emissions (56.9% of the District’s total gross emissions), followed by stationary energy (17.0% of the District’s total gross emissions).
13. Table 1 outlines the stationary energy gross emissions by sub-categories, while transport emissions are discussed in more detail later in this submission. For all stationary energy emissions:
  - a. Industrial consumption accounted for 42%
  - b. Residential consumption accounted for 22%
  - c. Commercial consumption accounted for 17%
  - d. Diesel and petrol (that was not allocated to another category) accounted for the remaining 19%.

**Table 1:** Gross emissions for Stationary Energy and associated sub-categories, 2019

Sector	tCO <sub>2</sub> e	% Gross	% Sector
Electricity Consumption	27,982	8.0%	47.0%
Electricity T&D Loss	2,298	0.7%	3.9%
Natural Gas	10,797	3.1%	18.1%
Natural Gas T&D Loss	1,718	0.5%	2.9%
LPG	3,707	1.1%	6.2%
Stationary Petrol & Diesel Use	11,329	3.2%	19.0%
Coal	857	0.2%	1.4%
Biofuel / Wood	880	0.3%	1.5%
<b>Total:</b>	<b>59,568</b>	<b>17.0%</b>	<b>100.0%</b>

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

14. Between 2001 and 2019, emissions from stationary energy reduced in number and as a proportion of total gross emissions – 64,708 tCO<sub>2</sub>e (20% of total gross emissions) in 2001 compared to 59,568 tCO<sub>2</sub>e (18% of total gross emissions) in 2019, a fall of 8%. Emissions from residential stationary energy consumption shrank the most, by 24%. Emissions from commercial and industrial stationary energy consumption also decreased over this time (by 22% and 14% respectively).

15. The main changes in these stationary energy emissions are explained most noticeably by changes in electricity, natural gas, petrol and diesel use. Emissions from electricity reduced by 24%, largely due to changes in the mix of fuels used for electricity generation in New Zealand (i.e. the greater use of renewable energy, rather than fossil fuel). Emissions from natural gas reduced by 3%, but petrol emissions increased by 28% and diesel emissions increased by 118%.
16. The key message here is that most of these reductions in stationary energy were “due to changes in the mix of fuels used for electricity generation” rather than changes in behaviour in energy consumption. This is considerably different than Council’s experience with its own corporate greenhouse gas emissions.
17. Council has reduced its greenhouse gas emissions by 78% since 2010, and much of this reduction has occurred through real changes to our infrastructure and operational practices. To achieve this, Council has undertaken a range of actions to:
  - a. Transition infrastructure and operational practices to renewable energy sources (e.g., solar energy for processing wastewater, lighting libraries, and heating pools);
  - b. Upgrade our buildings, switch our fleet (to EVs), and change our behaviours to improve energy efficiency, use renewable energy, and reduce waste; and
  - c. Where possible, reduce demand on infrastructure (e.g., the introduction of water meters coupled with water sustainability education has helped to reduce demand on our water distribution network, and this has led to energy savings).

Appendix 2 provides more detailed information on many of these actions, including the emissions reductions achieved from each change.

18. While our District undoubtedly has eco-minded residents and business owners who are purchasing more energy efficient products and modifying their homes or businesses to be more energy efficient, there is still considerable work to be done to support commercial and industrial operations as well as most homeowners and renters.
19. The consultation document refers to existing measures such as the Warmer Kiwi Homes programme or the Sustainable Business Network Climate Action Toolbox (p28). Central government funding schemes are a good first step to encourage behaviour change. Councils alone could not fund such programmes at scale, but councils could partner with Government to promote and implement such programmes at a local level. A rebate scheme for solar panels similar to the Warmer Kiwi Homes programme is needed. In addition, more funding is required for local EV charging stations, as the rebate scheme for EVs will encourage greater EV uptake.<sup>4</sup>

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<sup>4</sup> In 2018, Council partnered with Horowhenua District Council, Electra and ChargeNet and successfully applied to the Energy Efficiency and Conservation Authority’s Low Emission Vehicle Contestable Fund to install eight electric vehicle (EV) fast chargers across Kāpiti and Horowhenua. Installing fast chargers in Kāpiti town centres

20. In terms of supporting businesses, Council is particularly interested in programmes to help emissions-intensive businesses move to new operating models; working with businesses to reduce their emissions profile; and training programmes to prepare employees for lower-emissions jobs. Council is pleased to see that Government has already identified some of these issues and intends to consider them further during the first budget period (p29).
21. Council is keen to work with Government to make these types of programmes available to our local business community and is hopeful that the reform of Vocational Education and the establishment of the New Zealand Institute of Skills & Technology will provide improved opportunities for our District. Our Economic Development Strategy highlights the need for improved training and local investment. Limited tertiary facilities in our District mean that rangatahi who are just entering the workforce, and existing workers who would like to retrain, commonly must travel outside of our District for training and tertiary education.

## **Aligning systems and tools**

### **Government accountability and coordination**

- *In addition to the Climate Change Commission monitoring and reporting on progress, what other measures are needed to ensure government is held accountable?*
  - *How can new ways of working together like mission-oriented innovation help meet our ambitious goals for a fair and inclusive society and a productive, sustainable and climate-resilient economy?*
  - *Is there anything else you wish to share in relation to government accountability and coordination?*
22. As discussed above in response to the question about the key barriers Government could remove to support decarbonisation (see paragraphs 4-7), cross-Government alignment to ensure consistency in legislation and mandates is one of the most important things required to support local government bodies. Council is pleased to see that ‘making sure social, economic and environmental policies support one another’ is already identified in the consultation document as a key requirement (p32).

### **Funding and financing**

- *What are the main barriers or gaps that affect the flow of private capital into low-emissions investment in Aotearoa?*
- *What constraints have Māori and Māori collectives experienced in accessing finance for climate change response activities?*
- *What else should the Government prioritise in directing public and private finance into low-emissions investment and activity?*
- *Is there anything else you wish to share in relation to funding and financing?*

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helps support the uptake of EV's while also supporting local businesses, which will benefit from EV driver's custom.



23. Three barriers that are likely affecting the flow of private capital into low-emissions investment are: (i) a general lack of understanding about low-emissions investment; (ii) concerns about the impact of low-emissions investment on profits; and (iii) a lack of incentives to make such a transition.
24. In general, more information is needed to help private investors understand what constitutes low-emissions investment, why it is needed, and how it can be done. Improved guidance on how to make this transition without having a negative impact on people's livelihoods is crucial. Initiatives that help to channel private investors towards low-emissions investment opportunities (e.g., New Zealand Green Investment Finance Limited (NZGIF) and the Regional Strategic Partnership Fund) are a great start.
25. In order to reach net-zero, the largest transition must come from industry and agriculture. While there are many examples of innovation starting to occur, regulations that require these investments might be needed to encourage a faster transition.
26. If central government genuinely wants to empower local government (as discussed on p18 of the consultation document), more funding to local government is required. There are many programmes and services that local government could provide to enable mitigation in local businesses and communities, but most territorial authorities cannot do this without being funded to do so.

#### **Emissions pricing**

- *Do you have sufficient information on future emissions price paths to inform your investment decisions?*
  - *What emissions price are you factoring into your investment decisions?*
  - *Do you agree the treatment of forestry in the New Zealand Emissions Trading Scheme (NZ ETS) should not result in a delay, or reduction of effort, in reducing gross emissions in other sectors of the economy?*
  - *What are your views on the options presented above to constrain forestry inside the NZ ETS? What does the Government need to consider when assessing options? What unintended consequences do we need to consider to ensure we do not unnecessarily restrict forest planting?*
  - *Are there any other views you wish to share in relation to emissions pricing?*
27. For Council's investment decisions, we rely on the NZ ETS price controls. Council uses the price controls to measure the cost-effectiveness of proposed projects to lower emissions in comparison with purchasing the same volume of carbon credits on the market.
  28. In order to meet the net-zero target, Council feels agriculture needs to be brought under the NZ ETS in order to incentivise low-emissions investment (as discussed in paragraph 25 above).

## Planning

- *In addition to resource management reform, what changes should we prioritise to ensure our planning system enables emissions reductions across sectors? This could include partnerships, emissions impact quantification for planning decisions, improving data and evidence, expectations for crown entities, enabling local government to make decisions to reduce emissions.*
- *What more do we need to do to promote urban intensification, support low-emissions land uses and concentrate intensification around public transport and walkable neighbourhoods?*
- *Are there any other views you wish to share in relation to planning?*

29. Land-use planning is a key component of the net-zero transition pathway. Current legislative reforms must not compromise local government's ability to develop and implement plans on behalf of its communities, especially when these plans aim to enable a low carbon economy while also enabling environmental protection and restoration.
30. As discussed in paragraphs 5-7 above, while the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill is projected to increase much-needed housing supply, it could inadvertently encourage housing intensification in areas that are not near public transport nodes. This could then lead to increased greenhouse gas emissions as the residents in these new houses would be more likely to rely on private vehicles.
31. It is also important that sufficient support, information, and advice be provided at a national level to assist local decision makers. Local government should not be in the position where each local body must re-create the same evidence base to support a course of action (or prepare to face a legal challenge), especially when this course of action is consistent with a national emissions reduction plan.
32. Moreover, new legislation should not only support councils to develop land-use plans to support the Transition Pathway, but also provide councils with a wide range of tools and supports to enforce these plans. For example, the National Policy Statement on Urban Development 2020 acknowledges the need to intensify housing at public transport nodes. This principle is consistent with the Wellington Regional Growth Framework and the direction of our Kapiti Growth Strategy, which is helping to shape our planning for a forecasted population increase of 30,000 by 2051. Local governments must be well supported to plan appropriately and 'hold the line' to ensure that growth occurs in a way that supports the net-zero transition pathway. Councils also need to be supported with an effective public transport network to ensure that population growth doesn't continue to drive up private transport related emissions.
33. The same applies to the question about how the emissions reduction plan can promote nature-based solutions that are good for both climate and biodiversity. If 'nature-based solutions that are good for both climate and biodiversity' are truly the intention of central government, then this principle must start at the national level and be carried through

regional levels down to local levels, where local governments will be supported to see this put into practice. Without this support, local government cannot guarantee this outcome.

### **Research, science and innovation**

- *What are the big challenges, particularly around technology, that a mission-based approach could help solve?*
- *How can the research, science and innovation system better support sectors such as energy, waste or hard-to-abate industries?*
- *What opportunities are there in areas where Aotearoa has a unique global advantage in low-emissions abatement?*
- *How can Aotearoa grow frontier firms to have an impact on the global green economy? Are there additional requirements needed to ensure the growth of Māori frontier firms? How can we best support and learn from mātauranga Māori in the science and innovation systems, to lower emissions?*
- *What are the opportunities for innovation that could generate the greatest reduction in emissions? What emissions reduction could we expect from these innovations, and how could we quantify it?*
- *Are there any other views you wish to share in relation to research, science and innovation?*

34. As Council has learned from its own emissions reduction experience, it is important to focus on innovation that creates enduring change. Council's success in emissions reduction has been due to real change in building designs and operational practices, which has meant that most of the changes have endured over time. While there are many examples of best practice from overseas, often more work is required to fit those ideas to the New Zealand context. This is discussed further below in the section on building and industry.

### **Behaviour change**

- *What information, tools or forums would encourage you to take greater action on climate change?*
- *What messages and/or sources of information would you trust to inform you on the need and benefits of reducing your individual and/or your businesses emissions?*
- *Are there other views you wish to share in relation to behaviour change?*

35. The climate crisis parallels a public health crisis in that the impacts on individuals and communities are wide ranging and require an all-of-government response. As such, Government is well placed to implement a nationwide campaign, similar to many public health campaigns that have been delivered in the past. The campaign must be accompanied by accessible and easy-to read information that helps individuals, communities, and businesses transition to low-emissions living.

36. In order to encourage widespread action, opportunities for emissions reduction must be made as simple as possible. Here we must think about busy households and small business owners who acknowledge the importance of this transition, but do not have the time or the energy to develop their own transition plan despite the many resources that are available.

37. Lastly, a common reaction we hear from individuals and small businesses is that they are not convinced their actions will matter. Some feel it is pointless to even try when there are so many other big emitters, nationally and internationally. For this reason, it is important to (i) illustrate why and how transitions for individuals and small businesses matter and (ii) publicise good news stories about transitions that are occurring with big emitters as well.

### **Moving Aotearoa to a circular economy**

- *Recognising our strengths, challenges, and opportunities, what do you think our circular economy could look like in 2030, 2040, and 2050, and what do we need to do to get there?*
- *How would you define the bioeconomy and what should be in scope of a bioeconomy agenda? What opportunities do you see in the bioeconomy for Aotearoa?*
- *What should a circular economy strategy for Aotearoa include? Do you agree the bioeconomy should be included within a circular economy strategy?*
- *What are your views of the potential proposals we have outlined? What work could we progress or start immediately on a circular economy and/or bioeconomy before drawing up a comprehensive strategy?*
- *What do you see as the main barriers to taking a circular approach, or expanding the bioeconomy in Aotearoa?*
- *The Commission notes the need for cross-sector regulations and investments that would help us move to a more circular economy. Which regulations and investments should we prioritise (and why)?*
- *Are there any other views you wish to share in relation to a circular economy and/or bioeconomy?*

38. The current waste minimisation reforms that focus on the effective use of resources – such as designing out waste in the first instance; designing for effective deconstruction to maximise recovery of materials; using recycled materials from waste that has been generated; or recycling or reprocessing waste back into new products – will underpin our movement to a circular economy. It is imperative that the Emissions Reduction Transition Pathway supports those initiatives from the waste minimisation sector.

39. It is equally important that all government agencies recognise the role they play in the transition. Not only is it important to provide support and resources to regional and local communities, but Government must also consider its own practices – whether it be better construction of buildings, roads or infrastructure, or even waste from government offices, waste minimisation must be incorporated through better procurement to model improved behaviours and drive change.

### **Transitioning key sectors**

#### **Transport**

*We are proposing four new transport targets in the emissions reduction plan, and are seeking your feedback.*

- *Do you support the target to reduce vehicle kilometres travelled by cars and light vehicles by 20 per cent by 2035 through providing better travel options, particularly in our largest cities, and associated actions?*
- *Do you support the target to make 30 per cent of the light vehicle fleet zero-emissions vehicles by 2035, and the associated actions?*
- *Do you support the target to reduce emissions from freight transport by 25 per cent by 2035, and the associated actions?*
- *Do you support the target to reduce the emissions intensity of transport fuel by 15 per cent by 2035, and the associated actions?*
- *The Climate Change Commission has recommended setting a time limit on light vehicles with internal combustion engines entering, being manufactured, or assembled in Aotearoa as early as 2030. Do you support this change, and if so, when and how do you think it should take effect?*
- *Are there any other views you wish to share in relation to transport?*

40. Because transport is the largest source of the Kāpiti Coast districtwide emissions inventory, Council is particularly interested in emissions reductions from the transport sector.

41. As a member of the Wellington Region Transport Committee (RTC), Council supports all aspects of the RTC's submission, and we note that the Regional Land Transport Plan has identified an emissions reduction target for the Wellington Region. In addition, on 11 November 2021, Council passed a motion to support the Free Fares Campaign being coordinated by the Aotearoa Collective for Public Transport Equity. The Free Fares campaign is advocating for free public transport for Community Service Card holders, tertiary students and under-25s.

42. Districtwide emissions from transport increased in number, and as a proportion of total gross emissions, from 142,714 tCO<sub>2</sub>e (45% of total gross emissions) to 199,773 tCO<sub>2</sub>e (57% of total gross emissions) between 2001 and 2019. Within the transport sector, the largest increase was for road emissions from petrol and diesel use, which increased by 48% from 2001 to 2019.

43. Population growth alone is not sufficient to explain this increase in transport emissions as per capita emissions from transport were 3.3 tCO<sub>2</sub>e in 2001 compared to 3.6 tCO<sub>2</sub>e in 2019.

44. This increase in transport emissions was the largest real change in all districtwide emissions, despite Council's efforts to enable mode shift and active transport. In our submission to the Climate Change Commission, Council discussed our many efforts over the years to promote mode shift. This submission has been attached as Appendix 3.

45. Several community groups in our District argue that there is a correlation between these rising transport emissions and the new expressways. This is plausible as the new expressways could make driving into Wellington an attractive option, particularly if the public transportation options are limited.

46. Our communities, particularly in rural areas, rely heavily on private cars due to poor connectivity, lack of investment in the rail network, poor levels of bus service, and lack of integration within and between modes. Access to key educational and health services located outside the District can also be a significant issue for some of our residents.
47. The Kāpiti Coast District Council Sustainable Transport Strategy identifies addressing climate change and improving mode choice as key focus areas. However, encouraging a change in travel behaviour and supporting mode shift to reduce transport-based emissions requires significant infrastructure funding. This needs to be identified and addressed to ensure there is no impact on local government expenditure and rate payers, particularly since many smaller councils with a low rate paying base can find themselves competing against larger cities, Waka Kotahi and regional councils (who are responsible for public transport funding) for limited funding sources.
48. For many of our transport projects, 51% of the funding comes from Waka Kotahi but this needs to be co-funded through mechanisms such as the Long-term Plan. Where funding bids to Waka Kotahi are unsuccessful, or funding received is lower than bids made, local councils either need to fund the project or forgo / defer projects. Recently, our Council has had to indefinitely defer a number of projects supporting transport connectivity and active transport due to unsuccessful funding bids.

#### **Energy and industry**

- *In your view, what are the key priorities, challenges and opportunities that an energy strategy must address to enable a successful and equitable transition of the energy system?*
- *What areas require clear signalling to set a pathway for transition?*
- *What level of ambition would you like to see Government adopt, as we consider the Commission's proposal for a renewable energy target?*
- *What are your views on the outcomes, scope, measures to manage distributional impacts, timeframes and approach that should be considered to develop a plan for managing the phase out of fossil gas?*
- *How can work under way to decarbonise the industrial sector be brought together, and how would this make it easier to meet emissions budgets and ensure an equitable transition?*
- *Are there any issues, challenges and opportunities for decarbonising the industrial sector that the Government should consider, that are not covered by existing work or the Commission's recommendations?*
- *In your view, should the definition of a large energy user for the purposes of the proposed Energy and Emissions Reporting scheme include commercial and transport companies that meet a specified threshold?*
- *We have identified a proposed threshold of 1 kt CO<sub>2</sub>e for large stationary energy users including commercial entities. In your view, is this proposed threshold reasonable and aligned with the Government's intention to meet emissions budgets and ensure an equitable transition?*
- *In your view, what is an appropriate threshold for other large energy users such as transport companies?*

- *Are there other issues, challenges or opportunities arising from including commercial and transport companies in the definition of large energy users for the purposes of the proposed Energy and Emissions Reporting scheme that the Government should consider? Supporting evidence on fleet size and characteristics is welcomed.*
- *What level of support could or should Government provide for development of low-emissions fuels, including bioenergy and hydrogen resources, to support decarbonisation of industrial heat, electricity and transport?*
- *Are there any other views you wish to share in relation to energy?*

49. As local authorities are responsible for civil defence emergency management in their areas, Council is always looking to identify and manage risks to the District. While Council supports the transition to renewable energy, it is important to ensure energy resilience, particularly in the face of drought or natural disaster.

50. In terms of decarbonising the industrial sector, it is also important to consider the strategic interests of the country. Currently, New Zealand is experiencing massive shortages across a range of sectors because of supply chain issues. If New Zealand chose to decarbonize some sectors by moving offshore, for example, this could create new risks that might have long term impacts on New Zealand's economy. Any efforts to decarbonise the industrial sector should include incentives to support local and regional innovation. In addition, there might be a need for Government to support key sectors that have the potential to develop in the longer term (e.g. hydrogen).

#### **Building and construction**

- *The Commission recommended the Government improve the energy efficiency of buildings by introducing mandatory participation in energy performance programmes for existing commercial and public buildings. What are your views on this?*
- *What could the Government do to help the building and construction sector reduce emissions from other sectors, such as energy, industry, transport and waste?*
- *The Building for Climate Change programme proposes capping the total emissions from buildings. The caps are anticipated to reduce demand for fossil fuels over time, while allowing flexibility and time for the possibility of low-emissions alternatives. Subsequently, the Commission recommended the Government set a date to end the expansion of fossil gas pipeline infrastructure (recommendation 20.8a). What are your views on setting a date to end new fossil gas connections in all buildings (for example, by 2025) and for eliminating fossil gas in all buildings (for example, by 2050)? How could Government best support people, communities and businesses to reduce demand for fossil fuels in buildings?*
- *The Government is developing options for reducing fossil fuel use in industry, as outlined in the Energy and industry section. What are your views on the best way to address the use of fossil fuels (for example, coal, fossil gas and LPG) in boilers used for space and water heating in commercial buildings?*
- *Do you believe that the Government's policies and proposed actions to reduce building-related emissions will adversely affect any particular people or groups? If so, what actions or policies could help reduce any adverse impacts?*

- *How could the Government ensure the needs and aspirations of Māori and iwi are effectively recognised, understood and considered within the Building for Climate Change programme?*
- *Do you support the proposed behaviour change activity focusing on two key groups: consumers and industry (including building product producers and building sector tradespeople)? What should the Government take into account when seeking to raise awareness of low-emissions buildings in these groups?*
- *Are there any key areas in the building and construction sector where you think that a contestable fund could help drive low-emissions innovation and encourage, or amplify, emissions reduction opportunities? Examples could include building design, product innovation, building methodologies or other?*
- *The Ministry of Business, Innovation and Employment (MBIE) is considering a range of initiatives and incentives to reduce construction waste and increase reuse, repurposing and recycling of materials. Are there any options not specified in this document that you believe should be considered?*
- *What should the Government take into account in exploring how to encourage low-emissions buildings and retrofits (including reducing embodied emissions), such as through financial and other incentives?*
- *What should the Government take into account in seeking to coordinate and support workforce transformation, to ensure the sector has the right workforce at the right time?*
- *Our future vision for Aotearoa includes a place where all New Zealanders have a warm, dry, safe and durable home to live in. How can we ensure that all New Zealanders benefit from improved thermal performance standards for our buildings?*
- *Are there any other views you wish to share on the role of the building and construction sector in the first emissions reduction plan?*

51. Council contends there is merit in making it mandatory to improve the energy efficiency of existing commercial and public buildings; however, the intended long-term use of the building and the expected life of the building might need to be considered as well. The mechanism to achieve this could happen in several ways. One option might be to provide incentives such as tax rebates for owners who take steps to improve their building's efficiency. Rates rebates might also be an option, provided that Government developed a system to reimburse territorial authorities. These initiatives will require central Government funding.

52. In response to the question about what the Government could do to help the building and construction sector reduce emissions, our Council has recently incorporated regionally-consistent requirements for waste management plans for construction and demolition sites where the build is over a certain value (yet to be determined) into our Solid Waste Management and Minimisation Bylaw 2021. To assist the sector in meeting these requirements, we are working closely with the sector to provide guidance and support. While this example is specific to waste, similar models could be used for other emissions sources (e.g., energy, transport).



53. In addition, and as promoted by MBIE, Council is also in the process of developing the resource recovery area at our transfer station, including providing options for separating and consolidating construction and demolition materials. This will help divert construction and demolition waste away from landfills. There is a lack of solutions for timber, however, so incentives and funding to address this significant waste stream are required.
54. Another source of emissions in the building and construction sector that appears to be overlooked is the draining of peatlands to make sites suitable for building. This is of particular concern in the Kāpiti Coast due to the District's large areas of peatland. As peatlands have acted as carbon sinks for thousands of years, greenhouse gas emissions are released into the atmosphere when they are drained. Because it is difficult to measure emissions from drained peatlands at the local level, these emissions appear to fall under the radar and are not included in emissions inventories. In addition, there does not appear to be any mechanism to include these emissions as a cost of development.
55. While our Solid Waste Management and Minimisation Bylaw 2021 requires waste management plans for construction and demolition sites (as noted in paragraph 52 above), it seems plausible that someday a carbon neutral plan could be required as well. In order to do this, however, tools and resources are required to estimate emissions that would arise from building plans, along with incentives and mechanisms to enforce the requirements.
56. As for the reduction of fossil fuel use in buildings, Council is concerned that establishing timeframes forcing people to no longer use fossil fuels could raise equity issues, particularly for residential buildings. As many people currently rely on gas for heating and cooking, moving away from these towards electricity could mean that some people can no longer afford to heat their homes or cook their meals. As these costs could be from transitioning appliances or housing infrastructure to electric or increasing costs of electricity itself, financial support must be made available for those needing help to make this transition.
57. It is also important to consider whether such requirements could inadvertently drive perverse outcomes. For example, the increasing cost of housing is resulting in a proliferation of 'tiny homes'. Some of these can be sub-optimal alternatives, skirting around current requirements and resulting in more people living in substandard housing. As such, any new requirements should take into account what this means for the costs of building and how this might impact consumer behaviour.
58. Ultimately, a one-size-fits-all approach is unlikely to work. Identifying and understanding each target audience is critical. To reduce costs, there might also be merit in considering whether there are other options that could rely on existing building infrastructure. For example, are there new technologies that the Government could support (e.g., hydrogen) that could, in turn, provide more cost-effective options?
59. In regard to improved thermal performance standards for buildings, the building regulations play a key role. With the current regulations, there are instances where a finished building

could be approved without ensuring the bare minimum requirements for delivering a warm, dry home. Regulations must define and promote gold standard energy efficiency, while also defining and promoting resilience, low maintenance, and low whole-of-life costs.

60. This can only be delivered with a workforce that is trained to support this transition. For example, how insulation is installed will make a big difference to how the finished building will perform. Upskilling the workforce, alongside better-quality assurance tools, will lead to better standards of work and more efficient buildings.
61. It is also equally important that programmes are developed to improve existing housing stock that is poorly designed and/or poorly insulated. In 50 years, it is likely that most of the existing housing in our District will still be in use. Programmes like Warmer Kiwi Homes should be expanded to include energy conservation and transitions to renewable energy sources. Council supports the requirements for landlords to make these changes through the Residential Tenancies Act reforms and would argue that even further requirements could be mandated.
62. Through discussions with the development sector in our District, it is clear that innovation in the building and construction sector (for new builds or remodels of existing builds) would benefit from a contestable fund. There is a need for new ideas for low-emissions designs that also allow for climate change adaptation. While there are many examples of innovative designs overseas, it is not always clear how suitable these models are to the New Zealand context. As the majority of the Kāpiti Coast District lies between the coastline and the foothills, innovation for building in areas that are prone to ponding and flooding is essential.

### **Agriculture**

- *How could the Government better support and target farm advisory and extension services to support farmers and growers to reduce their emissions?*
  - *How could the Government support the specific needs of Māori-collective land owners?*
  - *What could the Government do to encourage uptake of on-farm mitigation practices, ahead of implementing a pricing mechanism for agricultural emissions?*
  - *What research and development on mitigations should Government and the sector be supporting?*
  - *How could the Government help industry and Māori agribusinesses show their environmental credentials for low-emissions food and fibre products to international customers?*
  - *How could the Government help reduce barriers to changing land use to lower emissions farming systems and products? What tools and information would be most useful to support decision-making on land use?*
  - *Are there any other views you wish to share in relation to agriculture?*
63. Council recognises that agricultural emissions are a significant proportion of New Zealand's greenhouse gas emissions profile.

64. In the Kāpiti Coast District, however, agriculture emissions reduced by 41% (more than any other sector) from 2001 to 2019. The reason for this is due to a reduction in the number of livestock animals farmed within the District.
65. The Kāpiti Coast District is welcoming more sustainable and plant-based businesses to its region and has started working together with stakeholders to increase sustainable plant food production.

## **Waste**

- *The Commission's recommended emissions reduction target for the waste sector significantly increased in its final advice. Do you support the target to reduce waste biogenic methane emissions by 40 per cent by 2035?*
  - *Do you support more funding for education and behaviour change initiatives to help households, communities and businesses reduce their organic waste (for example, food, cardboard, timber)?*
  - *What other policies would support households, communities and businesses to manage the impacts of higher waste disposal costs?*
  - *Would you support a proposal to ban the disposal of food, green and paper waste at landfills for all households and businesses by 1 January 2030, if there were alternative ways to recycle this waste instead?*
  - *Would you support a proposal to ban all organic materials going to landfills that are unsuitable for capturing methane gas?*
  - *Do you support a potential requirement to install landfill gas (LFG) capture systems at landfill sites that are suitable?*
  - *Would you support a more standardised approach to collection systems for households and businesses, which prioritises separating recyclables such as fibre (paper and cardboard) and food and garden waste?*
  - *Do you think transfer stations should be required to separate and recycle materials, rather than sending them to landfill?*
  - *Do you think that the proposals outlined in this document should also extend to farm dumps?*
  - *Do you have any alternative ideas on how we can manage emissions from farm dumps, and waste production on farms?*
  - *What other options could significantly reduce landfill waste emissions across Aotearoa?*
66. Council supports the submission from the the WasteMINZ TA Forum, specifically in regard to the feedback provided on specific targets.
67. Waste emissions for the Kāpiti Coast District reduced by 4% between 2001 and 2019. This decline was driven primarily through improved landfill gas capture where waste is disposed. Council continues to promote behaviour change, particularly through its education programmes funded by the Waste Levy, but more behaviour change is required. Further incentives would help, such as pricing of alternative re-use, recovery and disposal options or rebate schemes for certain recyclables.

68. In response to the question about initiatives that can help households, communities and businesses reduce their organic waste (including timber), it is important to note that timber waste comes mainly from the construction sector. This is not necessarily the result of 'wrong' behaviour, but rather a by-product of building norms, regulations, and requirements. As a result, timber waste must be considered in relation to the previous section about the building and construction sector.
69. In theory, Council would support a proposal to ban the disposal of food waste, greenwaste, and paper from landfills for all households and businesses by 1 January 2030, but only if viable and operational alternatives were established by 2030. Council would support a more standardised approach to food waste collection systems, but would like to see local or regional options available to process the food waste.
70. Council has supported 88 organic waste minimisation projects over the last 10 years and will continue to encourage and support such de-centralised projects using waste minimisation funding. Waste analysis data indicates that even with recycling options in place, a lot of recyclable material is placed in waste bins. Monitoring of household recycling, with education and feedback loops to promote behaviour change, is required and funding support for this would assist. In addition, greater incentives may be required in those instances where waste collection is carried out by private providers rather than councils.
71. In terms of landfill gas (LFG) capture systems, Council would support a potential requirement to install these at landfill sites when suitable. In addition, Council also supports the requirement for transfer stations to separate and recycle materials, rather than sending them to landfill.
72. Council notes that sewage sludge is only mentioned in a footnote of the consultation document: "Options for pre-treatment is another pathway particularly relevant to wastewater treatment plant sludges and will be a focus area for future emissions reduction plans" (p104).
73. Sewage sludge is an ongoing issue that many local authorities struggle to manage because it has a large emissions footprint and increases with population growth. It is very difficult – if not impossible – to reduce sewage sludge and the processing of sewage sludge impacts other parts of the waste stream. One of the reasons why some landfills in the Wellington Region do not divert more greenwaste to compost is because they require a certain volume of greenwaste (and other general waste) to achieve the required ratios for mixing with sewage sludge.
74. While the Ministry for the Environment has drafted standards for the management of sewage sludge in the past, the proposed management methods have not been palatable to local iwi. If sewage sludge is not addressed now as a priority, however, the processing of sewage sludge will continue to prevent the diversion of other organic wastes to compost. Nationally, this is a significant issue.

## F-gases

- *Do you think it would be possible to phase down the bulk import of hydrofluorocarbons (HFCs) more quickly than under the existing Kigali Amendment timetable, or not?*
- *One proposal is to extend the import phase down to finished products containing high-global warming potential HFCs. What impact would this have on you or your business?*
- *What are your views on restricting the import or sale of finished products that contain high-global warming potential HFCs, where alternatives are available?*
- *What are your views on utilising lower global warming potential refrigerants in servicing existing equipment?*
- *Do you have any thoughts on alternatives to HFC refrigerants Aotearoa should utilise (eg, hydrofluoroolefins or natural refrigerants)?*
- *Can you suggest ways to reduce refrigerant emissions, in combination with other aspects of heating and cooling design, such as energy efficiency and building design?*

75. From 2001 to 2019, industry emissions in the Kāpiti Coast District increased by 445%. Most of these emissions are caused by industrial refrigerant use, which increased by 498% in this period. The actual amount of emissions is small, but it does raise concerns.

## Forestry

- *Do you think we should look to forestry to provide a buffer in case other sectors of the economy under-deliver reductions, or to increase the ambition of our future international commitments?*
- *What do you think the Government could do to support new employment and enable employment transitions in rural communities affected by land-use change into forestry?*
- *What's needed to make it more economically viable to establish and maintain native forest through planting or regeneration on private land?*
- *What kinds of forests and forestry systems, for example long-rotation alternative exotic species, continuous canopy harvest, exotic to native transition, should the Government encourage and why?*
  - *Do you think limits are needed, for example, on different permanent exotic forest systems, and their location or management? Why or why not?*
  - *What policies are needed to seize the opportunities associated with forestry while managing any negative impacts?*
- *If we used more wood and wood residues from our forests to replace high emitting products and energy sources, would you support more afforestation? Why or why not?*
- *What role do you think should be played by:*
  - *central and local governments in influencing the location and scale of afforestation through policies such as the resource management system, ETS and investment?*
  - *the private sector in influencing the location and scale of afforestation?*
- *Pests are a risk to carbon sequestration and storage in new, regenerating and existing forest. How could the Government support pest control/management?*
- *From an iwi/Māori perspective, which issues and potential policies are a priority and why, and is anything critical missing?*
- *Are there any other views you wish to share in relation to forestry?*

76. Forestry must provide a buffer. This is not just in case other sectors of the economy under-deliver reductions or to increase the ambition of our future international commitments, but rather because some sectors are likely to always have some emissions.
77. While Council has been successful in lowering its corporate emissions, Council remains a large services provider and, as such, will always emit. In fact, emissions are likely to increase in some areas as the District grows. For this reason, carbon sequestration through forestry is essential for our organisation when pursuing carbon neutrality.
78. Due to the role that local government plays in land-use planning, local government should be well placed to influence the location and scale of afforestation, but guidance and support are required. Councils will need support to hold firm on any requirements that are put in place for afforestation on private land; some land-owners will require incentives – often financial – to use their land in this way; and there will need to be a way to ensure that the forests are not removed when the land changes ownership.
79. Council would also like to see consideration given to afforestation of surplus Government land. Due to the construction of expressways across the Kāpiti District, Government owns pockets of land along the expressway route that will become surplus once the expressways are completed. Afforestation on this land would enable sequestration, while also providing environmental and biodiversity benefits.
80. Council notes that sequestration through wetlands appears to be growing. In September 2020, Greater Wellington Regional Council supported proposals to retire grazing and restore rare wetlands and forest ecosystems in Queen Elizabeth and Kaitoke regional parks. In Queen Elizabeth Park, the intention is to restore 128.5 hectares of peatland and dune forest. Greater Wellington argued, “While restoring the peatland to wetland will not yield tradeable [carbon] units, it will contribute towards real emissions reductions to the atmosphere by converting the land from a carbon source to a carbon sink”.
81. Undoubtedly, our Council supports the environmental restoration intention but holds concerns about the overall sequestration potential of restored wetlands. Our understanding of the science is that wetlands can sequester carbon dioxide, but some can emit large amounts of methane depending on the composition of the wetland which causes them to emit more CO<sub>2</sub>e than they sequester. This is of concern because, in the short term, methane has considerably more warming power than carbon dioxide. More science that includes considerations of methane emissions is required.
82. As wetlands are prevalent throughout the Kāpiti Coast District, our Council is very interested in this science. If wetlands can serve as net greenhouse gas sinks, incentives to restore them (similar to those being developed for forests) would be useful. The added benefits of wetlands for our District, in addition to enhancing biodiversity, is that they can also contribute to stormwater management which is becoming increasingly important for climate change adaptation.

## **Appendix 1: Kāpiti Coast District Council's Climate Emergency Action Framework**

### **1. Framework Validation**

- 1.1 The Kāpiti Coast District Council Climate Emergency Action Framework was adopted at a meeting of the Kāpiti Coast District Council held on 29 July 2021, after completion of a public consultation process as part of the Long-term Plan 2021–41.

### **2 Vision**

- 2.1 The vision at the heart of the Climate Emergency Action Framework is a thriving, vibrant and strong Kāpiti that has reduced its carbon footprint significantly, transitioned to a low-carbon future, and prepared for challenges and opportunities that come from responding to the climate crisis.

### **3 Objectives**

- 3.1 The Framework's primary objective is to establish a common aim and set of principles to embed considerations of climate change mitigation, adaptation, sustainability and resilience across the organisation.
- 3.2 The Framework will guide Council decision-making to ensure consistent practices, embed sustainability across Council, provide a platform to raise awareness about existing workstreams, and provide a platform to agree plans and priorities for future work.
- 3.3 The objectives and principles proposed in the Framework align with the community outcomes of the Long-term Plan 2021–41 and are based on feedback Council has been receiving from the community for the past several years.
- 3.4 Additional information on Council's current and future climate change-related workstreams will follow the development of this Framework.

### **4 Principles**

- 4.1 Council demonstrates strong and effective leadership on climate change mitigation and adaptation to support Toitū Kāpiti and give effect to the climate change emergency; this includes a commitment to act in the face of uncertainty using the best scientific information available.
- 4.2 Council honours Te Tiriti o Waitangi and its partnership with mana whenua. Ngāti Raukawa ki te Tonga, Ātiawa ki Whakarongotai, and Ngāti Toa Rangatira will be involved as partners in Council's climate change response and any projects that arise from this Framework to ensure a mana enhancing partnership is nurtured throughout.
- 4.3 Council will meet all of its climate change-related statutory obligations.

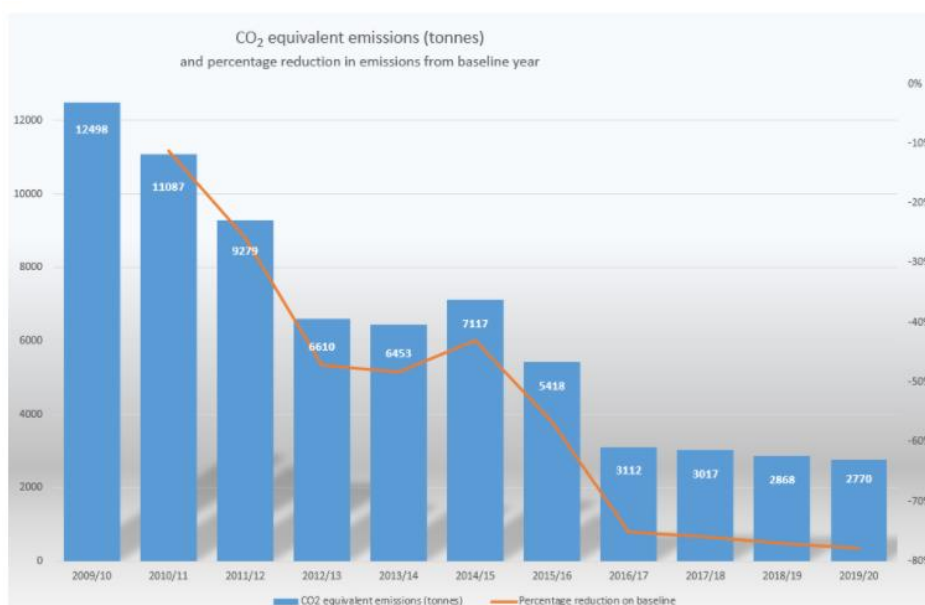
- 4.4 Decision making is inclusive, transparent, and based on ongoing collaboration and consultation with the wider community, businesses, social service organisations, and key sectors from industry and science.
- 4.5 Decision making will acknowledge the depth of knowledge that Ngāti Raukawa ki te Tonga, Ātiawa ki Whakarongotai, and Ngāti Toa Rangatira hold in terms of climate change and the value of māramatanga (lessons learned through centuries of kaitiakitanga, manaakitanga, and whanaungatanga). Council will draw on this knowledge during the decision-making process to reflect the value of māramatanga and the expertise that mana whenua have in this area.
- 4.6 Decision making will consider:
  - 4.6.1 Best practice guidance and recommendations
  - 4.6.2 Costs and benefits, including broader co-benefits to the four well-beings
  - 4.6.3 Level of risk, particularly if an action is not taken
  - 4.6.4 Urgency of any issues at hand
  - 4.6.5 How effectively a proposed action will address any issues at hand
  - 4.6.6 Avoiding any actions that might worsen inequity or compromise future generations
  - 4.6.7 Promotion of actions that will allow mana whenua to act as kaitiaki, supporting them to create sustainable practices that they can implement within their rohe
  - 4.6.8 Mana whenua advice, community feedback, and potential alignment with neighbouring councils
  - 4.6.9 Long-term effectiveness of proposed actions, regardless of current or future trends or pressures.
- 4.7 Sustainability, resilience, and climate change-related work is integrated and coordinated across Council.
- 4.8 Council takes opportunities to participate in government reforms of national policy and legislation – particularly in relation to climate change mitigation, adaptation and the Resource Management Act (RMA).
- 4.9 Council advocates for policies and programmes that support the Toitū Kāpiti vision, and actively canvasses for funding opportunities.
- 4.10 Council looks for and takes opportunities to lead, facilitate and empower iwi-led and other community-led projects and initiatives that aim to build sustainability, resilience, and green innovation.



## Appendix 2: Emissions reduction at Kāpiti Coast District Council

Kāpiti Coast District Council made a decision in 2011 to focus strongly on reducing its corporate greenhouse gas emissions (GHG) to mitigate its contribution to climate change. To ensure independent validation of its achievements and help embed 'carbon conscious' behaviour into the community and key industries, the Council joined CEMARS® (Certified Emissions Measurement and Reporting Scheme) administered at the time by Enviro-Mark Solutions.\*\* Being part of this leading emissions measurement scheme put Council in a strong position to promote the importance of measuring, managing and reducing carbon and other greenhouse gas emissions.

For the 2019/20 year, Council's GHG emissions audit verified that the Council had reduced its carbon footprint by 78%, from 12,500 tonnes CO<sub>2</sub>e in 2009/10 (the baseline year) to 2,769.95 tonnes CO<sub>2</sub>e in 2019/20.



A range of actions were taken to lower emissions. [Here we outline a few of the major projects undertaken to achieve this result.](#)

### Fuel switching and renewable energy

- **Reductions in diesel:** Early on it was noted that diesel was a significant source of fuel for many of the Council's activities. To reduce its consumption, the Council looked for alternatives. As part of this effort, the drying of sludge at the Paraparaumu Wastewater Treatment Plant (PWWTP) was converted from diesel to wood chip in September 2010, which significantly reduced greenhouse gas emissions and the operating costs of the plant. The energy savings from this project were estimated at approximately \$300,000 per annum

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\*\* CEMARS was renamed 'Carbon reduce' certification in late 2019 and Enviro-Mark Solutions was renamed 'Toitū Envirocare' (which is still a wholly owned subsidiary of Manaaki Whenua - Landcare Research).

and it was calculated to have reduced our emissions by about 23% at the time of implementation (a reduction of around 2,880 tonnes CO<sub>2</sub>e by the time the full year effects had worked through in 2011/12).

- Transitioning to solar:
  - o In January 2012, a small solar photovoltaic (PV) system was installed at Ōtaki Library as a pilot. As this was deemed successful, in 2014/15, the Paraparaumu Wastewater Treatment Plant's power requirements were supplemented with the installation of a 32kW array of solar panels, which saved \$6,000 in electricity costs in its first full year (at prices prevailing at the time).
  - o In 2018, Energise Ōtaki (EO) came to Council with a proposal to establish a Solar PV farm on Council land alongside the Ōtaki Wastewater Treatment Plant (WWTP), with a view to selling the electricity generated to the WWTP 'behind the meter'. With grant funding from the Wellington Community Trust, a lease agreement between EO and Council was signed and a 107 kWp solar array was installed in October 2020. Council pays EO for the power and the proceeds are put into the Whakahiko Ōtaki – Energise Ōtaki Fund to support community-initiated energy projects. Council benefits from a modest reduction in its GHG emissions as the renewable electricity is supplied directly to the Ōtaki WWTP and reduces its need for grid supplied electricity. For its part, Energise Ōtaki will gain a source of regular income which it will use to develop other renewable energy and energy efficiency projects in the community. This project was awarded the 'Best Community Energy Project 2021' from the SEANZ Fronius New Zealand Sustainable Energy Industry Awards and was a finalist in the 2021 New Zealand Energy Excellence Awards.

### **Energy efficiency**

- Swimming pools:
  - o As swimming pools can be fairly energy intensive to run, they were a natural place to assess for energy efficiency. When the Coastlands Aquatic Centre was designed, sustainable principles were incorporated from the outset. The translucent roof harvests solar energy which meets 12% of the facility's annual heating demand and has reduced the energy required for lighting by 70%.
  - o At the Ōtaki Pool, a new condensing gas boiler was installed in October 2012 as a more energy efficient replacement for the old boiler. In 2014/15, an energy management system was installed at the pool to further improve the energy efficiency of the operation. In late 2019 a feasibility study was commissioned to look at the potential for further energy efficiency gains through installation of an HVAC system and to explore the requirements, costs and carbon savings of a move from the condensing gas boiler to heat pumps for water and space heating. The results of that study found that the cost of the investment would be too great compared to the emissions saved, but other options were identified including installation of heat transfer units and other improvements to reduce heat loss in the building.
- Civic administration building: The Council's upgrade of its Civic Building included an atrium designed to allow natural light to filter into the space which has reduced lighting energy requirements. Shading of north-facing windows, efficient air conditioning and ventilation,

meeting room occupancy sensors and responsive lighting systems have also contributed to significant energy efficiency improvements. Accordingly, the building was awarded a 4.5 (out of 6) star NABERSNZ rating. The Council has since carried out similar refurbishments in other buildings and continues to look for other opportunities in its building stock across the District.

#### **Installation of water meters**

- Household and business water meters were installed throughout the District in 2013/14 as part of a move to improve water conservation, identify leaks, and enhance the sustainability of our existing water supply. The resultant reduction in demand for water had the additional benefit of significantly reducing electricity use through our water distribution network. In 2014/15, an estimated \$88,000 of energy costs for water and 159 tonnes of CO<sub>2</sub>e emissions were avoided.

#### **Disposal of sewage sludge**

- Our local landfill at Otaihanga reached the end of its life and was closed to all but cleanfill in late 2015. As a consequence, we were forced to find an alternative disposal site for our dried sewage sludge from the Paraparaumu WWTP. From January 2016 we have transported the dried sludge to Silverstream Landfill in Lower Hutt. Because the Silverstream landfill had a certified Landfill Gas Capture and Destruction rate of 90%, this move contributed to a very significant reduction in our emissions.

#### **Electric Vehicles**

- Council purchased a Nissan Leaf battery-electric vehicle for its carpool in 2016. This vehicle has the lowest costs of ownership compared to other vehicles in its class and reduces CO<sub>2</sub>e emissions. Council later purchased a second Nissan Leaf in December 2019 as well as an EV for the Mayor's vehicle. Council has recently agreed to purchase 5 more EVs.
- We are currently in the process of exploring EV charging options at the Civic building with a view to expand EV charging capability by adding 3 new stations as well as future proofing by laying infrastructure for 4 more EV charging stations. This will allow us to easily add charging stations as EVs are added to the Council fleet.

#### **LED streetlights**

- Over 2017/18 to 2018/19, Council converted 4,699 conventional streetlights to LED's out of a total of 5,320 streetlights in the District (noting that a number of streetlights are private).
- Verified audit data for 2018/19 shows that the LED streetlight replacement programme resulted in a reduction of 933,000 kWh in electricity use compared to 2016/17 (prior to the start of the programme) and a reduction of 111 tonnes in CO<sub>2</sub>e emissions.
- The projected annual energy savings are estimated to be around 1.05 -1.2 million kWh from 2019/20 onwards (compared to 2016/17), resulting in a reduction of around 140-150 tonnes CO<sub>2</sub>e per annum compared to 2016/17.
- Council is currently looking for other opportunities to continue with the LED roll out in other areas, such as our parks and parking lots.

## **Appendix 3: Kāpiti Coast District Council's Submission to the Climate Change Commission**

4 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.<sup>1</sup>

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 beach 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, according to Statistics New Zealand's provisional residential population estimates.

In May 2019, Kāpiti Coast District Council declared a climate emergency and announced an aim to achieve corporate carbon neutrality by 2025, and established a Waste Minimisation Task Force. 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 tCO<sub>2</sub>e, 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.

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

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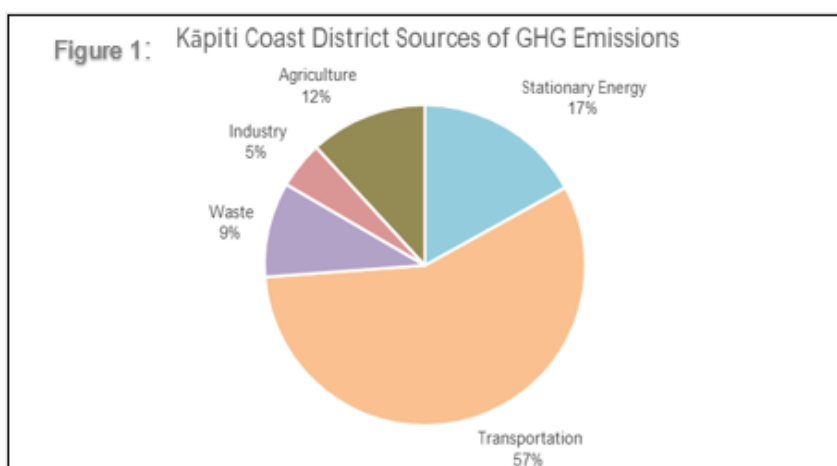
<sup>1</sup> According to the 2018 Census, the median age in the Kāpiti Coast District is 47.9 which is 2% higher than it was in 2013; 40% of residents are not in the labour force compared to 31% nationally; estimates suggest close to 40% receive income from New Zealand superannuation or Work and Income, 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).

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 travel to work by car, truck or van.<sup>2</sup>



Sector sub-category	tCO <sub>2</sub> 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%
<b>Total:</b>	<b>199,773</b>	<b>56.9%</b>	<b>100.0%</b>

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

<sup>2</sup> Source: 2018 Census. Main means of travel to work by age group and sex, for the employed census usually resident population count aged 15 years and over. The results for private vehicle, company vehicle, and passenger have been combined

This data tells us that a mode shift away from fossil fuel vehicles is the most important thing needed to reduce emissions across 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 submissions 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.<sup>3</sup>

### **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.<sup>4</sup>

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<sup>3</sup> 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.

<sup>4</sup> 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.<sup>A</sup>
- 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.

<sup>A</sup> 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. <sup>A</sup>
- There are no buses from Ōtaki going north towards Levin for residents that must go north to access essential services. <sup>B</sup>
- 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 is required; and

### 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.

<sup>A</sup> 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.

<sup>B</sup> 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  
K. Gurunathan JP, MA  
**MAYOR, KĀPITI COAST DISTRICT**