

1 April 2021

[REDACTED]

[REDACTED]

Response - Official Information Request

I refer to your request for information received on 29/03/2021. Your request has been considered under the Local Government Official Information and Meetings Act 1987 (LGOIMA) and I provide the following information.

This is a request for Official Information under the Local Government Official Information and Meetings Act of 1987 in relation to Council's submission to the Climate Change Commission

We request the following information:

- **The submission Council made to Climate Change Commission.**

Please find attached requested submission.

- **Which advisors or consultants, if any did Council use in relation to Council's submission?**

The Council confirms that no advisors or consultants were instructed in relation to the drafting of Council' submission on the Climate Change Commission's Draft Advice report.

- **If Council did use advisors or consultants, how much did Council pay for their services?**

The Council can also confirm that there was no expenditure or payments for advisors and consultants in relation to this submission.

You are entitled to seek a review by the Office of the Ombudsman regarding the withheld information. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Horowhenua District Council publishes responses to Local Government Official Information and Meetings Act 1987 (LGOIMA) requests that we consider to be of wider public interest, or which relate to a subject that has been widely requested. To protect your privacy, we will not generally publish personal information about you, or information that identifies you. We will publish the LGOIMA response along with a summary of the request on our website. Requests and responses may be paraphrased.

If you have any queries regarding this information, please contact the LGOIMA Officer on 06 366 0999 or email - LGOIMAOfficer@horowhenua.govt.nz

Yours sincerely,



Lisa Slade
Executive Sponsor - LGOIMA

30 March 2021

The Climate Change Commission Secretariat
PO Box 24448
Wellington 6142
Attention: Submissions analysis team

To the submissions analysis team,

Submission of the Horowhenua District Council on the Climate Change Commission Draft Advice to Government

Introduction

The Horowhenua District Council (the Council) thanks the Climate Change Commission for the opportunity to make a submission on the 2021 Draft Advice to Government on recommended pathways for reducing Aotearoa New Zealand's greenhouse gas emissions.

The Council makes this submission in recognition of the purpose of local government set out in the Local Government Act 2002, and the role, status, powers and principles under that Act relating to local authorities. In particular, the Council's comments are made in recognition of its functions and responsibilities under the Local Government Act 2002, the Resource Management Act 1991 (RMA) and the Climate Change Response Act 2002.

The Council commends the Commission for the Draft Advice Report and the detailed analysis that underpins and supports the report recommendations. The Council appreciates the intent of the Commission's draft advice is to reduce New Zealand's emissions and to set out an emissions budget and policy frameworks to guide collective action over the next 14 years to lessen the impacts of climate change. We also appreciate the importance of having an independent body providing politically neutral advice to central government.

The Horowhenua District Council's (HDC) submission is focussed on aspects of concern to our community and also many other small cities and towns in provincial New Zealand.

The Council acknowledges the need for a comprehensive range of policy tools to enable New Zealand to mitigate and adapt to the effects of climate change but notes that the new obligations for local government need to be backed up with appropriate funding allocations, potentially through a new national fund. This would address existing and future funding capacity issues and minimise equity issues and financial hardships for communities, particularly those in coastal locations, who are likely to experience the worst aspects of climate change.

The Council is keenly aware of the risks for local government arising from climate change adaption and mitigation. These extend beyond sea level rise and flooding to extreme weather events such as storms and drought to other matters such as pests and human health effects associated with higher

temperatures – all of which will need to be anticipated and managed at the local community level. There are also significant implications for Local Government in relation to infrastructure threatened by climate change, including impacts on local roads and bridges, water wastewater and stormwater and flood protection infrastructure, as well as threats to community services and facilities, iwi sites of significance, and our productive and most intensively used land. Climate change related expenditure will likely lead to general rates increases, and the use of other funding tools available to Council, such as targeted rates and users charges.

In preparing for climate change adaption, the Council has been proactively collaborating with Horizons Regional Council and other Districts within the Horizons Region to develop a Manawatū-Whanganui Climate Change Risk Assessment. Community consultation has also provided some formative information for the collaboration around community views and values concerning climate change and priority actions in our region. Further engagement is planned with specific interest groups and iwi, hapu and whanau over the next two months.

Submission

The Council supports the submissions made the LGNZ.

General comments

Some general comments are also provided below on matters of interest and concern in the context of the Horowhenua District. These comments are provided under the following headings:

- Emission Budgets, Principles and Focus Areas
- Policy Priorities to Reduce Emissions
- Commission Recommendations
- Consideration of impacts on the District's primary sector activities and transition

Emissions Budgets, Principles and Focus Areas

The Council understands the first three emissions budgets are designed to set Aotearoa New Zealand on the path towards the net zero target for 2050. Council supports in principle the Commission taking an approach and setting emissions budgets that are in line with New Zealand's contribution towards limiting global warming to 1.5°C.

The Council supports separating gases in line with the Zero Carbon Act's split-gas approach.

The Council strongly supports a greater focus on mode-shift to public and active transport, and also a focus on reducing the overall need to travel. Council also supports actions to accelerate the uptake of EVs to reduce emissions. The Council submits that in urban areas and particularly high growth localities, that encouraging large scale electric vehicle uptake may undermine efforts to make active and public transport comparatively more attractive. This may need some further consideration. Transitioning to EVs may be challenging for the lower socio economic demographic groups as EVs are generally expensive.

Council notes the emissions budget for transport is heavily focused and reliant on rapid uptake of on EVs and is concerned that this effort may disproportionately impact people on lower incomes. This raises questions of equity, and the (lack of) affordability for many in the community will need to be addressed comprehensively by Government. The Council submits that very significant support will be required to ensure access to affordable low emission transport options for people on lower incomes. The Council also submits that there are very limited public transport services (bus and rail) currently available in the Horowhenua District, and for commuting to Palmerston North and Wellington.

There have also been concerns expressed to Council with regard efforts to phase out gas use. The Council submits that clarification would be helpful to indicate the focus is on heating systems in existing buildings and not on, for example, on personal BBQs, or camping equipment etc.

The Council generally supports efforts to increase carbon sequestration through native plantings. Growing new native forests will help to create a long-lived source of carbon removals and has benefits for biodiversity and ecology. The Council also notes that natives can improve fire resistance compared to many exotic pines and are useful in mitigating soil erosion and landslides. Whilst Council supports a prioritisation to establishing new permanent native forests it submits that exotic forests will still be required to supply wood for building materials (housing) and other uses. Exotic timber has an important role to play to displace steel and concrete which are emission intensive materials. The Council submits that the Climate Commission undertake further work in regard with the Building Act and the Building Code to ensure legislative alignment and promote well-planned transition away from emission intensive building and construction materials. i.e, sustainable building materials.

The Council cautions that planting forests also carry their own risks and the available space for planting is not inexhaustible. While planting presents an opportunity for farmers and growers to diversify their operations and improve carbon sequestration this may potentially result in a reduction in land use diversity, if large swathes of existing farmland are converted to native and exotic forestry. It may also may have significant impacts on local communities and their long term viability.

The Council supports the need for cross-party support and a joined-up approach for Aotearoa New Zealand to meet its emission reduction targets, promote a resilient communities and sustainable businesses.

Policy Priorities to Reduce Emissions

To help meet Aotearoa New Zealand's emissions budgets the Council supports as policy priorities: concerted action to address barriers, pricing to influence investments and choices, and investment to spur innovation and system transformation.

The Council submits that actions to reduce barriers to those on lower incomes will be vital to ensuring a just transition to a low emission economy in Aotearoa New Zealand.

Investing in innovative system-wide transformations will be necessary. Strong pricing signals are required to ensure investment moves towards lower emission options, and this will help to drive necessary innovation. Investments should be focused on providing options that enable people to choose affordable low-emission options.

The Council submits that behaviour change programmes will be essential to achieving our Country's emissions reduction budgets and targets. Behaviour change programmes will need to be relevant locally, and take a multi-faceted approach that appeals to different groups. Effective partnerships between Central and Local Government to inform the public of the emissions impact of the various choices available to them, will help enable positive change and also help businesses strategise concerning climate change risks and resilience.

Commission Recommendations: Specific Comments

- Recommendation 1:

The Council supports enabling Recommendation 1. Cross party support will be crucial to achieving our targets. Other steps may also be required to encourage the de-politicisation of decision-making.

- Recommendation 2:

The Council supports enabling Recommendation 2. Council supports the allocation of roles and responsibilities to a nominated Minister (or Ministers), and that funding requirements are assessed and met for each of the emissions budgets.

The Council submits that clear lines of accountability will help ensure that the recommendations and actions are delivered. The Council also supports in principle the Commission's proposal to establish a "vote climate" budgeting portfolio approach, so that funds can be allocated transparently and tracked across Central Government agencies.

- Recommendation 3:

The Council strongly supports genuine, active and enduring partnership with iwi/Māori in developing and implementing climate action and taking an intergenerational kaitiaki approach (stewardship).

- Recommendation 4:

The Council strongly supports enabling Recommendation 4. The Council recognises that climate action requires a genuine partnership between Central and Local Government. The Council submits that new funding mechanisms will be required for local government to be able to help implement and deliver on the emissions reduction plans. The Council also submits that funding certainty for shared priority areas - such as transport - is essential to ensure investments are driven towards low emission options. The recommendation is strongly supported as it would be of significant benefit to Local Government.

Council supports enabling Recommendation 4.a., as alignment across legislation is needed to enable effective local government decision-making to help our communities and to provide effective leadership. We also suggest the Recommendation 4.a. includes a specific reference to the Land Transport Act, as transport is one of the biggest sources of emissions in the country. It is vital that emissions reduction efforts are acknowledged throughout all relevant legislation. Climate considerations need to be consistently applied through all National Policy Statements, and those which are applicable to Local Government.

- Recommendation 5:

The Council supports the direction to incorporate the views of all New Zealanders. It is important that community engagement leads to tangible climate change actions. As young people will be significantly impacted by climate change throughout their lives, Council would like to see the importance of including the voices of children and young people embedded in Recommendation 5. Incorporating the views of all New Zealanders will also require a multicultural approach to engage with iwi as well as various other cultures who may be underrepresented at the political level.

Addressing existing inequalities and inequities will be essential to achieving the Commission's recommendations. The Council also submits that attention be given to the co-benefits of not just climate policy but other policies that have climate change benefits.

As a general observation, Council is concerned that the package of recommendations appear to take a 'top down' approach to planning with communities. The Council supports a broad focus with stronger recommendations on working with affected communities and workforces, to achieve greater equity and inclusivity in transition planning. The Council also submits that the Commission should recommend to Central Government that localised planning responses to respond to the effects of climate change, are democratic, collective and include all those affected by the transition.

The Council recognises that overall taxation policies need to be addressed when considering incentives or pricing mechanisms to drive change otherwise the transition to a low emission economy will not be equitable across regions or communities. Transport should be an integral part of any discussion of an equitable, inclusive transition – as it is key to people having the ability to access opportunities including work and education. As discussed in the Draft Advice, transitioning the country's light vehicle fleet away from fossil fuels is vitally important, and equity issues will need addressing regarding costs - especially in early budget periods before a significant 2nd hand fleet is available.

The Council submits that more focus needs to be given on urban form (to make cycling/walking more attractive and safe), and on public transport investment which is needed to ensure more equitable

transition for those who cannot afford an electric vehicle, or use other transport modes. In the broader sense, a more holistic view of 'costs and benefits' across all levels of Government is needed to ensure a more equitable transition – and social, cultural, health and environmental wellbeings must be given as much emphasis as what's viewed as financially 'affordable'.

Consideration of impacts on the District's primary sector activities and transition

New Zealand's regions are highly diverse and the impacts of climate mitigation and adaptation will be equally diverse requiring the Commission or the Minister to have particular regard to these differences in finalising the emissions budget and policy frameworks. The Council considers it is crucial that the emissions reduction targets and the Local Government instruments/mechanisms for addressing climate change offers maximum certainty and predictability within which all sectors of society can plan and adapt to the effects of climate change. This is especially important for our primary sector.

The agricultural sector has limited options at the farm scale to significantly reduce greenhouse gas emissions below existing levels other than by substantial reductions in stock numbers or production. There are also significant challenges to be overcome in terms of accurately measuring agricultural emissions at the farm or sector scale. The requirement around gross biogenic methane emissions reduction could have significant social and economic consequences for communities and districts, like Horowhenua, where agriculture and horticulture makes a significant contribution to economic and social wellbeing. The Council submits that comprehensive transitional arrangements could be considered for sectors with limited access to low carbon technology options.

While the Council acknowledges the opportunity for farmers and growers to diversify their operations by, planting trees, this result in a reduction in land use diversity and resilient rural communities and townships if large swathes of existing farmland are converted to forestry. This could potentially have significant impacts on local communities.

Offshore mitigation will be important for New Zealand, especially in the transition, when there will be considerable uncertainty over long time periods, and questions over when new technologies will become available and at what cost. The option of using overseas mitigation options, even as a stop-gap measure, could mean we could meet our targets at lower cost than if we relied only on domestic reduction and removals. It could also help ease the transition to a low-emissions economy for the many people who will be affected by rising costs and other effects of the transition.

In terms of adaptation to climate change, the Council is keen to work closely with Central and Regional Government on a co-investment strategy for upgrading existing critical infrastructure (including network infrastructure) and the provision of new critical infrastructure to protect our coastal settlements and features of landscape, cultural or historic value.

The Council also submits that the effects of climate change are by definition local, and therefore require local engagement and responses. The Government must work in close partnership with Local Government, to ensure effective implementation of the emissions budget and policy frameworks.

The Council also reminds the Commission that New Zealand's transition to a low carbon economy must be carefully phased in, and must be just and fair for people, communities and regions.

We look forward to your consideration of this submission. We would like to be heard in relation to the matters raised within this submission.

Yours faithfully,



David Clapperton
Chief Executive