

WCC Submission on the Climate Change Commission's draft advice

Section/topic	Question	Support/ agreement	Overall answer
<b>The pace of change:</b>	Do you agree that the pace of change we have proposed would put Aotearoa on a path to meet the 2050 target?	<b>Disagree</b>	We strongly believe that to put New Zealand in the best position to achieve net zero by 2050 will require more urgent and transformational change in this current decade than the proposed path provides. Transportation is one area where the co-benefits of reducing emissions, and evidence that more could be achieved in a short time frame, would justify exploring ways to move faster.
<b>Future generations:</b>	Do you agree we have struck a fair balance between requiring the current generation to take action, and leaving future generations to do more work to meet the 2050 target and beyond?	<b>Disagree</b>	We firmly believe the responsibility to act on climate change lies firmly with this current generation. Future generations are already going to have to cope with the physical impacts of climate change due to the lack of action to reduce emissions up until now. While we agree with the Commission's advice that the focus should be on decarbonisation of long-lived gases, rather than relying on forestry, we do not think the pace of change is fast enough to ensure the burden of climate action is appropriately weighted to the present. Our view is that the Commission's advice should have a stronger level of ambition and urgency to ensure future generations are able to inherit a low carbon society and economy.
<b>Our contribution:</b>	Do you agree with the changes we have proposed to make the NDC more likely to be compatible with the 1.5°C goal?	<b>Disagree</b>	While we agree with the Commission's recommendations to strengthen the NDC we do not consider that "more likely to be compatible with... limiting warming to 1.5°C" is sufficient. We would like to see the Climate Commission specify the exact reduction in net emissions that is required in the NDC to make it compatible with a 1.5°C pathway and our role as a developed nation. Your advice implies that this is a reduction of 44% (against 2005 levels). It would be good to see the Commission specifically recommend one of the options.
<b>Role and types of forests:</b>	Do you agree with our approach to meet the 2050 target that prioritises growing new native forests to provide a long term store of carbon, and limits the amount of new exotic forestry needed to meet the 2050 target?	<b>Agree</b>	We support the prioritisation of native forests over the reliance on exotic forests due to the significant co-benefits and permanent nature of these. However we also recognise the benefits that fast growing species provide in absorbing carbon. We strongly recommend the Commission carefully consider the role of a mixed model where native forests are complimented by selected species of exotic hardwoods.
<b>Policy priorities to reduce emissions:</b>	What are the most urgent policy actions needed to help meet our emissions budgets?	<b>All</b>	<p>All three of these policy actions are required to achieve the urgent and deep emissions cuts we require. For example, to make progress on transport will require a mixture of:</p> <ul style="list-style-type: none"> <li>- addressing barriers (for example, reviewing regulatory requirements such as the traffic resolution process, and executing targeted and proven behaviour change programmes)</li> <li>- pricing (for example, putting in place congestion charging, increasing public transport subsidies) and</li> <li>- investment (for example, increased funding for public transport, cycling and walking infrastructure).</li> </ul> <p>Within Te Atakura - First to Zero, WCC's blueprint for a Zero Carbon Capital, we have a range of all three types of policy responses, both those that we can deliver ourselves and those that we are advocating for.</p> <p>If we look at the balance of current policy actions our view is that pricing is already well covered through the ETS pricing mechanism, with the exception being transport where the ETS has proven ineffective and other pricing tools like congestion charging are required.</p> <p>The policy actions that are currently lacking are those which will improve education, engagement and behaviour change, as well as a substantive uplift in funding.</p>
<b>Technology and behaviour change:</b>	Do you think our proposed emissions budgets and path to 2035 are both ambitious and achievable considering the potential for future behaviour and technology changes in the next 15 years?	<b>Disagree</b>	<p>The budgets and path are both achievable provided the government adopts the complete package of recommendations. However, we strongly believe the budget and path lacks the necessary ambition. The budgets appear to have been developed from the bottom up, considering recommendations for actions that we know are already underway, politically acceptable, affordable and would start us on the path (but not too quickly or radically). The focus on determining what is achievable means that the report fails to articulate what is possible.</p> <p>COVID-19 has been a great reminder of how our team of 5 million can respond to a crisis with innovation and a willingness to adapt. We acknowledge that an ambitious carbon budget would present a challenge, however we should not underestimate the ability of New Zealanders to pick up the challenge of climate change now that a clear plan of how we address it is emerging.</p> <p>We consider that both the budgets and path should be more ambitious to send the signal of how much transformation is actually required and to drive the necessary behaviour change. We would also recommend that more of a focus is placed on behaviour change and engaging the public in the climate challenge. This <a href="#">WRI paper</a> contains valuable insights on the role of behaviour change in climate action and the role central government can play.</p>

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1. Principles	Do you support the principles we have used to guide our analysis? Is there anything we should change, and why?	Partially support	<p>We strongly support having a clear set of principles to guide the transition and the work of the Commission. The principles provide a strong compass for the policy direction and specific actions that follow in the document. Generally, we consider this is a well-balanced set of principles. We have two concerns.</p> <p>Firstly, there appears to be a hidden principle that is pervasive throughout the report but not explicitly called out as a principle. This principle weights achievable over ambitious, in order to ensure the cost to the economy isn't too great. This has resulted in a bottom-up approach of what is economically feasible rather than a top-down approach of what is required. We consider that this drives pathways and policy recommendations centred on what is probable rather than what could be possible.</p> <p>This approach also ignores the economic costs of inaction or slow action, and the economic benefits of taking strong action. The Commission acknowledges that these economic analyses have not been undertaken. This then means that the "cost" of climate action is measured against a future projection of GDP that we know to be incorrect, as it is based on business-as-usual economic activity, which would lead to a 3-4C warmer world, with strongly negative impacts on our natural resources and economy that have not been taken into account in that projection.</p> <p>Secondly, while there is a commitment to align with the 2050 targets (within principle 1) the report on the whole lacks a sense of urgency. We believe the report would be strengthened with the addition of a new principle to act under urgency. This acknowledges that we are now in a climate emergency as declared at both a central government level, and the local government level by Wellington City Council and many others. There are too many recommendations that don't necessarily reflect the urgency required. Having urgency as a principle will help to drive more innovative thinking and stronger recommendations.</p> <p>We also support the recommendation of Taituarā (the Society of Local Government Managers) that Commission use a <a href="#">Three Horizons</a> approach more explicitly. Such an approach:</p> <ul style="list-style-type: none"> <li>- helps to provide clarity about the bigger picture of what we are changing from, and what we are changing towards by bringing shifts in assumptions and systems to the surface;</li> <li>- clarifies the overall direction and destination, but at the same time it leaves space for new ways of getting to the destination to emerge;</li> <li>- allows us to have explicit conversations about whether our strategies and actions are based on assumptions founded in the way we've been organising ourselves up to now, or whether they are based on the assumptions we need for the future;</li> <li>- provides us with a frame for discussing how much effort and resource we should be putting into: <ul style="list-style-type: none"> <li>o maintaining the status quo (the legacy of the previous state)</li> <li>o building infrastructure, services and processes to bring the preferred future into being</li> <li>o supporting the process of making the transitions (in New Zealand, we have a long history of under-resourcing the practical, cognitive and social aspects of making big shifts); and</li> </ul> </li> <li>- enables discussions to focus on <i>how</i> we make the transition from previous to future ways of doing things.</li> </ul>
2. Emission budget levels	Do you support budget recommendation 1? Is there anything we should change and why?	Not ambitious enough	<p>Our preference would be to see deeper cuts in emissions over the 15 years covered by the proposed budgets. This would support WCC's own climate action plan, Te Atakura, which is strongly reliant on the actions of central government to drive the changes our city requires.</p> <p>We do not believe the proposed budget levels set New Zealand on a path to contributing its fair share to limiting warming to 1.5°C. There is a risk that they place us in a future position of being overly reliant on offshore mitigation and borrowing.</p> <p>Our expectation is that the Commission will advise the government to set ambitious budget levels in proportion to the significance of the climate emergency, and we firmly believe the communication leading up to the release of the report has set a similar expectation for the public.</p> <p>We ask that the Commission revisits the budget levels to deliver a larger proportion of cuts over the next 15 years.</p>
3. Breakdown of budgets	Do you support our proposed break down of emissions budgets between gross long-lived gases, biogenic methane and carbon	Fully support	<p>We are pleased to see the Commission has set an expectation of actual reductions in gross emissions with a strong emphasis on tackling long lived gases over this period. We consider the Commission has got the balance about right in terms of forestry carbon removals in acknowledging that we cannot plant our way out of trouble.</p>

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	removals from forestry? Is there anything we should change, and why?		
<b>4. Offshore mitigation</b>	Do you support budget recommendation 4? Is there anything we should change, and why?	<b>Fully support</b>	<p>Onshore mitigation gives us the greatest opportunity to innovate and green our economy, competing on the world stage and bringing solutions to the world.</p> <p>With the expiration of Kyoto commitment period 2 at the end of 2020 there are no mechanisms currently in place, nor international agreements on how to trade carbon across national borders, making offshore mitigation impossible for at least the next several years.</p> <p>We acknowledge that the government does need to be able to use offshore mitigation as a last resort in exceptional circumstances such as a force majeure event (assuming offshore mitigation is available at some future point in time). This is a sensible approach.</p>
<b>5. Cross-party support</b>	Do you support enabling recommendation 1 on cross-party support for emissions budgets? Is there anything we should change and why?	<b>Fully support</b>	We strongly support the need for cross-party support. Ensuring that climate-related policies and dedicated funding are durable beyond the term of central government is crucial for long-term planning at the local government level.
<b>6. Co-ordinate across Govt</b>	Do you support enabling recommendation 6 on coordinating efforts to address climate change across Government? Is there anything we should change and why?	<b>Fully support</b>	<p>We strongly support a coordinated effort across government agencies to ensure creation of integrated climate action policies, strategies and funding. There is currently a noticeable lack of expertise and genuine commitment to the level of climate action that will be required across some central government agencies, including those that will be critical to successfully achieving our targets.</p> <p>We are in favour of the inclusion of policies and strategies in the emissions reduction plan that meet both the next and future emissions budgets. The nature of the system change we will need to be overseeing at a local level requires long term planning and having a view of future policy direction will assist with this.</p> <p>We are pleased to see the recommendation for the creation of a separate appropriation and annual budget for climate change. Dedicated budgets will provide local government with a clear path for funding climate related work.</p>
<b>7. Genuine active and enduring partnership with Maori</b>	Do you support enabling recommendation 3 on creating a genuine, active and enduring partnership with iwi/Māori? Is there anything we should change and why?	<b>Fully support</b>	<p>We strongly support the creation of a genuine, active and enduring partnership with iwi/Maori that enables iwi/Maori to exercise rangatiratanga and kaitiakitanga.</p> <p>This recommendation aligns with both WCC's obligation to Te Tiriti, and our priority to work in real partnership with mana whenua. Points a, b, and c align with iwi Māori rangatiratanga and strategic approach regarding kaitiakitanga and te taiao.</p> <p>We note that the plan suggested in the progress indicator for this recommendation must also include a high-level budget and identified sources of funding for partners to access in order to deliver emission reductions.</p>
<b>8. Central and local govt working together</b>	Do you support enabling recommendation 4 on central and local government working in partnership? Is there anything we should change and why?	<b>Fully support</b>	<p>We strongly support the need to ensure the legislative and policy frameworks at a national level are enablers for local government to be effective in addressing climate change. The way we grow and move around our cities, particularly our major metro cities, will be pivotal to achieving the cuts in emissions required to avoid the worst impacts of climate change.</p> <p>Local government has a key role to play, as the Commission points out, both in influencing emissions reductions in the short term but also shaping our towns and cities to enable low emissions living in the future.</p> <p>To facilitate our role we look to the partnership with central government to provide:</p> <ul style="list-style-type: none"> <li>- useful tools that are based on international best practice and the experience of local government across New Zealand;</li> <li>- funding and support for pilots to enable faster learning;</li> <li>- a platform for sharing knowledge; and</li> <li>- standardised sets of data, measures and KPIs across both central and local government (e.g. greenhouse gas measurement).</li> </ul>

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			<p>The climate challenge is unlike anything we have had to address at a local level before. We are confident we have the necessary agility, innovation and creativity, and relationships with local communities to identify and implement solutions. However we will need to have a central government partner that is able to provide clear and consistent guidance, be responsive, flexible and willing to learn alongside us as we take on this challenge.</p> <p>Local government is subject to multiple pieces of legislation which make our processes, and decisions, open to the risk of legal challenge. As such, when dealing with issues as challenging as climate change mitigation and adaptation, the clearer central government guidance can be, the more that risk is reduced. In saying that, it is critical that central government agencies engage extensively with local government in developing any guidance so that they can benefit from the community-facing experience that local government brings to the table.</p> <p>We note that the recommendation on funding and financing mechanisms is a bit unclear. The resource and funding constraints on local government need to be resolved in order for local councils (particularly those that are smaller and less well resourced) to take a more active role in encouraging, promoting, and supporting local actions in their communities.</p>
<p><b>9. Incorporate view of all NZers</b></p>	<p>Do you support enabling recommendation 5 on establishing processes for incorporating the views of all New Zealanders? Is there anything we should change and why?</p>	<p><b>Partially support</b></p>	<p>We are supportive of ensuring communities have a genuine opportunity to shape the response to climate change, however we question whether it is both practical and pragmatic to lead this at a national level.</p> <p>In our own experience and observing the experience of other regions and cities, the appropriate level to engage the public about climate change is within their own communities. Local government already has existing relationships, any number of forums, and in the eyes of many residents an expectation of accountability for the broad range of activities connected to climate change. Local government is well-placed to utilise their relationship with their residents to influence and encourage climate action more effectively than central government.</p> <p>As one example, we have observed the successful creation by the people of Taranaki (within a relatively short time period) of a place-based vision and pathway to transition – the Taranaki 2050 roadmap. Other localities, including Wellington City, have developed climate action plans with involvement from the community. Sharing these learnings and the engagement techniques with those yet to start on the journey would be a good start.</p> <p>Any engagement with the public on climate change should incorporate adaptation. Many communities are experiencing or are concerned about the physical impacts of climate change on their local area and will be as or more interested in discussing this than mitigation. Including adaptation will also help to start thinking about mitigation and adaptation together.</p> <p>We acknowledge that there are policy decisions and actions that are more national level such as when to place a ban on ICEs or the role of forestry in offsetting emissions. For these types of issues targeted engagement on each specific issue is likely to attract better participation from those most impacted rather than a national forum on climate change.</p> <p>We note that the progress indicator for enabling recommendation 5 sets a timeframe of the end of 2022 to propose mechanisms for engaging. If local government is sufficiently funded and resourced it would be feasible to develop local actions plans within that time period. The commission could also consider alignment between central and local government to enable progress on this to occur in parallel.</p>
<p><b>10. Focus on long-lived gases</b></p>	<p>Do you support our approach to focus on decarbonising sources of long-lived gas emissions where possible? Is there anything we should change and why?</p>	<p><b>Fully support</b></p>	<p>We strongly support the focus on decarbonising sources of long-lived gases to provide a clear signal that action is required rather than creating a reliance on offsetting through planting. This focus also supports Wellington City's own ambitious plans to achieve net zero carbon by 2050.</p>
<p><b>11. Focus on growing new native forests</b></p>	<p>Do you support our approach to focus on growing new native forests to create a long-lived source of carbon removals? Is there anything we should change and why?</p>	<p><b>Partially support</b></p>	<p>We support the focus on building a long-term carbon sink through native planting on less productive land.</p> <p>In our own experience the establishment of new native forests and the protection of existing native forests is a no-regrets move that will deliver significant co-benefits at a local and national level. We ask the Commission to also factor in mixed planting where selective exotic hardwood species are introduced alongside native species to provide both a carbon sequestration benefit but also an economic return to help fund the native forests.</p>

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12. Overall path	Do you support the overall path that we have proposed to meet the first three budgets? Is there anything we should change and why?	Partially support	<p>The proposed pathway for emissions reduction over the next 15 years will not enable us as country to meet our obligations to be on a pathway to 1.5C. This also undermines our commitment as a City to achieve a 43% reduction in emissions by 2030 and achieve net zero by 2050 under our Te Atakura, First to Zero Plan.</p> <p>The pathway needs to recognise that the way we live needs to fundamentally change in the next 15 years with a significant behavioural and lifestyle shift. At present, the pathway appears to be overly dependant on both known and expected technology to deliver emissions reductions. This is particularly evident in the pathway described for transport, which is overly focused on electric vehicles, and needs to recognise the role that managing demand, improving travel efficiency and modal shift will have. Moreover the heavy focus on EVs does nothing to shift New Zealand’s car-owning culture and at worse risks entrenching it. We also run the risk that as the EV owner community becomes more mainstream we face the same challenges we do now with public pressure to relieve private motor vehicle congestion through road building (which has been proven not to work) and strong resistance to removing on-street car parking to accommodate more climate friendly active and public transport modes.</p> <p><u>Transport</u></p> <p>The hierarchy that Wellington City has adopted when considering low emissions transport is to firstly - shift people from their single occupant cars into other transport modes to improve travel efficiency; secondly - reduce the need for travel; and finally - electrify vehicles. Note that our feedback on transport recommendations is from an urban point of view. We are of the view that more could be achieved in transport in urban areas, which would then enable the Commission to strengthen the transport recommendations and overall budgets.</p> <p>Accordingly, we suggest the Commission consider dividing the path for road transport into three rather than the current two rows (road transport and reducing travel demand) in table 3.1 showing the key transitions. We suggest the new rows in priority order be as shown in the following table. This revised path for road transport supports an aspirational position of achieving fossil free road transport by 2030. We note that the Commission uses the phrase “Reduce travel demand” to mean reducing demand for travel by car rather than reducing travel demand overall. Reducing required travel distances increases the ability for mode shift to walking and cycling in particular, so this is an important point to emphasise in the advice. We have also added in accelerating the roll out of car share and ride share services as a mechanism to increase the efficiency of travel by car.</p> <table border="1" data-bbox="1062 1087 2184 1629"> <thead> <tr> <th></th> <th>Budget 1</th> <th>Budget 2</th> <th>Budget 3</th> </tr> </thead> <tbody> <tr> <td>Support mode shift from cars to walking, cycling and public transport</td> <td>Encourage switching to walking, cycling and public transport</td> <td colspan="2"><b>Significantly increase investment in walking, cycling and public transport infrastructure</b></td> </tr> <tr> <td>Reduce travel demand</td> <td colspan="3">Encourage <b>flexible</b> working for those who can <b>Prioritise compact urban form around inner city and key public transport routes in spatial planning</b> <b>Support faster roll out of car share and ride share services</b></td> </tr> <tr> <td rowspan="2">Decarbonise road transport vehicles</td> <td>Accelerate EV uptake</td> <td rowspan="2">Improve average efficiency of new ICE vehicles</td> <td rowspan="2">Electrify medium and heavy trucks</td> </tr> <tr> <td>Phase out new light ICE vehicles <b>by 2030</b></td> </tr> <tr> <td></td> <td colspan="3"><b>Fund zero carbon mass transit</b></td> </tr> </tbody> </table> <p>In terms of achievability:</p> <ul style="list-style-type: none"> <li>- In the short term, it is possible to increase active modes of transport (walking and cycling), increase the uptake of public transport and car sharing services, and enable more flexible working.</li> <li>- Replacing cars with EVs will be achievable in the medium term as the barriers to cost and availability are overcome.</li> <li>- Creating compact urban form supported by new public transport infrastructure is a long-term project, although action to achieve this needs to start immediately.</li> </ul>		Budget 1	Budget 2	Budget 3	Support mode shift from cars to walking, cycling and public transport	Encourage switching to walking, cycling and public transport	<b>Significantly increase investment in walking, cycling and public transport infrastructure</b>		Reduce travel demand	Encourage <b>flexible</b> working for those who can <b>Prioritise compact urban form around inner city and key public transport routes in spatial planning</b> <b>Support faster roll out of car share and ride share services</b>			Decarbonise road transport vehicles	Accelerate EV uptake	Improve average efficiency of new ICE vehicles	Electrify medium and heavy trucks	Phase out new light ICE vehicles <b>by 2030</b>		<b>Fund zero carbon mass transit</b>		
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			<p>A key message that our Council would like to see in laying out that pathway for transport is <b>that we cannot maintain the current levels of personal vehicle ownership and usage regardless of whether those vehicles are in the future all zero emissions</b>. They represent an inefficient use of space, are the least efficient means of transporting people (in terms of energy-use/person-kilometres travelled), and they are contributing to growing challenges around material consumption and resource availability. <a href="#">EECA's Life Cycle Analysis</a> of electric vehicles versus petrol and diesel vehicles shows that "A reduction of carbon dioxide equivalent (CO2-eq) emissions approaching 60% will be realised over the full life cycle of the vehicle for a BEV compared with a petrol vehicle" which while a significant reduction, is not a reduction to zero. And the same study concludes "there are no significant differences across the technology types with regard to net resource depletion, although it should be noted that the levels of uncertainty in these findings was high" demonstrating that electric vehicles have no advantage when it comes to resource use. Car sharing has a role to play here, with a recent WCC survey of car share users concluding that 11.25 cars have been replaced by each car-share car.</p> <p>The prioritisation of active, shared and public transport modes aligns with our commitment to the people of Wellington to enable a just transition. These modes can provide affordable and accessible transport for all. And there are wider benefits of encouraging active transport (improving health outcomes) and public transport (increasing transport efficiency).</p> <p><u>Construction</u> We note that the Draft Advice makes no recommendations for reducing the embodied carbon of buildings or infrastructure. This seems like a lost opportunity to reduce the emissions associated with the manufacture of construction materials and promote low carbon industries and innovation in Aotearoa such as engineered timber. Thinkstep's report, <a href="#">Under construction: Hidden emissions and untapped potential of buildings for New Zealand's 2050 zero carbon goal</a>, notes that the total carbon footprint of New Zealand's buildings is 6% from a production perspective (Vickers et al 2018). Through construction material improvements, the report notes that 2.5% of New Zealand's production emissions could be reduced (excluding biogenic CO2 and CH4). Additionally, a focus on infrastructure carbon can result in significant reductions in emissions for a construction project, especially when considered during the early planning stage.</p> <p>While we acknowledge that MBIE's Building for Climate Change programme is focused on reducing both operational and embodied carbon emissions from new buildings, we would like to see embodied carbon reduction discussions extended across all infrastructure types. Guidance in this area is especially important for Local Governments, who provide city assets involving 3 waters and roading infrastructure. Additionally, partnerships between local and central government to deliver large scale water and transport infrastructure should be taking embodied emissions into account. National guidance in measuring, assessing and reducing embodied emissions is needed to ensure that everyone is working toward the same goal. We would like to see the Climate Change Commission specifically recommend that a national focus be given to measuring and reducing embodied emissions across all infrastructure types.</p> <p><u>Forestry</u> The path for forestry would benefit from consideration of the role of mixed planting, incorporating both native and exotic planting. There is a danger that a policy to prioritise pure native planting could negate this as an option. This would be unfortunate given the potential for mixed planting models to achieve faster carbon sequestration than native forestry can on its own, whilst still delivering significant biodiversity benefits in the long term.</p>
<b>13. Equitable and well managed transition</b>	Do you support the package of recommendations and actions we have proposed to increase the likelihood of an equitable, inclusive and well-planned climate transition? Is there anything we should change, and why?	<b>Partially supportive</b>	<p>The Council through our Te Atakura – First to Zero carbon action plan has committed to adopting and promoting a just transition for vulnerable and low paid Wellingtonians by ensuring the burden of change is equitably shared. We are therefore pleased to see the Commission recommending a time critical action to develop an Equitable Transitions Strategy.</p> <p>WCC's obligation to Te Tiriti, and our priority to work in real partnership with mana whenua, also lead us to strongly support these recommendations and actions, including "Developing skills and training into low emissions industries by Māori, for Māori."</p> <p><u>Necessary Action 1a – localised transition planning</u> We strongly support the recommendation for central government to work in partnership with local government and local stakeholders to develop localised transition plans for specific regions. Local government already has existing relationships, any number of forums, and in the eyes of many residents an expectation of accountability for the broad range of activities connected to climate change. Local government is well-placed to utilise their relationship with their residents to influence and encourage climate action more effectively than central government, and would welcome partnerships and additional funding to deliver on this recommendation.</p>

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			<p><u>Necessary Action 1b and 1c – support for small business and impacted workforces</u> We strongly support these recommendations to support small business and impacted workforces through the climate transition.</p> <p><u>Necessary Action 1d – insulation and efficient heating</u> There is a strong need for New Zealand to have warmer, drier, healthier homes given the poor state of much of our housing, and the disproportionate impact that has on the more vulnerable parts of society. We therefore welcome the specific recommendation to assess the current standards and funding programmes for insulation and efficient heating. WCC like many local government bodies, owns a significant portfolio of social housing, much of which requires upgrading. Central government guidance and funding support would be welcomed in order to get this done. We would also like consideration of improving the building code, strengthening compliance with the Healthy Homes Guarantee Act, increased education around efficient heating and home energy efficiency, and requiring government and council social housing to meet higher energy efficiency standards than currently required.</p> <p>We would like it noted, however, that improving New Zealand’s existing housing stock will not significantly reduce emissions, as residents move from rationing their heating to fit within their budget, to being able to achieve greater heating outcomes for the same amount of input energy. New homes present greater opportunities – better designed new homes and buildings (using passive house design principles) can significantly reduce energy requirements and almost eliminate space heating needs in some cases. Healthier homes are part of broader social challenge that also includes housing affordability, low incomes, and energy hardship. These issues need to be addressed in a holistic manner by central government and through the appropriate forums, in addition to being part of this advice.</p> <p><u>Necessary Action 1e</u> It is positive to see the acknowledgement of co-benefits and how these need to be factored into climate policy and decision making. Improving the evidence base on co-benefits will assist at a local government level where we inevitably need to make trade-offs in the way we prioritise our expenditure. Establishing this evidence base needs to be a priority. If we look at the example of healthy home standards, understanding the current number and performance of homes that are not meeting the standard will help to provide the evidence base for how effective the standards are in terms of financial and health benefits.</p> <p>In addition, there is a need to equip New Zealanders with the life and personal skills necessary to take climate action for a low emissions economy and to be resilient to the impacts of climate action policies and climate change itself. We support Taituarā’s (the Society of Local Government Managers) recommendation that this be added to <u>Necessary Action 1</u>. We also think this is relevant to <u>Necessary action 16</u> on behaviour change.</p>
<b>14. Transport</b>	Do you support the package of recommendations and actions for the transport sector? Is there anything we should change, and why?	<b>Partially support</b>	<p>We strongly support this package of recommendations and actions, however we have feedback on the priority order of the recommendations, as well as the completeness and balance of the recommendations. We are also of the view that more action could be taken earlier, allowing a stronger budget for emissions reductions from transport to be set.</p> <p>Transport accounts for ~50% of Wellington City’s emissions and as such is a key priority for our Te Atakura – First to Zero climate action plan. We are looking for how the Climate Commission’s recommendations can provide the enabler for the transport actions we are currently progressing and what we will need in the future to support our aspiration to reduce the city’s emissions by 43% by 2030 (compared to 2001) and be a net zero carbon city by 2050.</p> <p>The hierarchy that Wellington City has adopted when considering low emissions transport is to firstly - shift people from their single occupant cars into other transport modes to improve travel efficiency; secondly - reduce the need for travel; and finally - electrify vehicles. Note that our feedback on transport recommendations is from an urban point of view. We are of the view that more could be achieved in transport in urban areas, which would then enable the Commission to strengthen the transport recommendations and overall budgets.</p> <p>Accordingly, we suggest the Commission consider dividing the path for road transport into three rather than the current two rows (road transport and reducing travel demand) in table 3.1 showing the key transitions. We suggest the new rows in priority order be as shown in the following table. This revised path for road transport supports an aspirational position of achieving fossil free road transport by 2030. We note that the Commission uses the phrase “Reduce travel demand” to mean reducing demand for travel by car rather than reducing travel demand overall. Reducing required travel distances increases the ability for mode shift to walking and cycling in particular, so this is an important point to emphasise in the advice. We have also added in accelerating the roll out of car share and ride share services as a mechanism to increase the efficiency of travel by car.</p>

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			<table border="1"> <thead> <tr> <th></th> <th>Budget 1</th> <th>Budget 2</th> <th colspan="2">Budget 3</th> </tr> </thead> <tbody> <tr> <td>Support mode shift from cars to walking, cycling and public transport</td> <td>Encourage switching to walking, cycling and public transport <b>Significantly increase investment in walking, cycling and public transport infrastructure</b></td> <td></td> <td colspan="2"></td> </tr> <tr> <td>Reduce travel demand</td> <td colspan="4">Encourage <b>flexible</b> working for those who can <b>Prioritise compact urban form around inner city and key public transport routes in spatial planning</b> <b>Support faster roll out of car share and ride share services</b></td> </tr> <tr> <td rowspan="2">Decarbonise road transport vehicles</td> <td>Accelerate EV uptake</td> <td></td> <td colspan="2">Electrify medium and heavy trucks</td> </tr> <tr> <td>Improve average efficiency of new ICE vehicles Phase out new light ICE vehicles <b>by 2030</b></td> <td></td> <td colspan="2"></td> </tr> <tr> <td></td> <td colspan="4"><b>Fund zero carbon mass transit</b></td> </tr> </tbody> </table>					Budget 1	Budget 2	Budget 3		Support mode shift from cars to walking, cycling and public transport	Encourage switching to walking, cycling and public transport <b>Significantly increase investment in walking, cycling and public transport infrastructure</b>				Reduce travel demand	Encourage <b>flexible</b> working for those who can <b>Prioritise compact urban form around inner city and key public transport routes in spatial planning</b> <b>Support faster roll out of car share and ride share services</b>				Decarbonise road transport vehicles	Accelerate EV uptake		Electrify medium and heavy trucks		Improve average efficiency of new ICE vehicles Phase out new light ICE vehicles <b>by 2030</b>					<b>Fund zero carbon mass transit</b>			
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			<p>In terms of achievability:</p> <ul style="list-style-type: none"> <li>- In the short term, it is possible to increase active modes of transport (walking and cycling), increase the uptake of public transport and car sharing services, and enable more flexible working.</li> <li>- Replacing cars with EVs will be achievable in the medium term as the barriers to cost and availability are overcome.</li> <li>- Creating compact urban form supported by new public transport infrastructure is a long-term project, although action to achieve this needs to start immediately.</li> </ul> <p>A key message that our Council would like to see in laying out that pathway for transport is that <b>we cannot maintain the current levels of personal vehicle ownership and usage regardless of whether those vehicles are in the future all zero emissions</b>. They represent an inefficient use of space, are the least efficient means of transporting people (in terms of energy-use/person-kilometres travelled), and they are contributing to growing challenges around material consumption and resource availability.</p> <p>The prioritisation of active, shared and public transport modes aligns with our commitment to the people of Wellington to enable a just transition. These modes can provide affordable and accessible transport for all. And there are wider benefits of encouraging active transport (improving health outcomes) and public transport (increasing transport efficiency).</p> <p><b>Supporting mode shift from cars to walking, cycling and public transport</b> Our view is that the key recommendations and actions for transport in the report are overly focused on EVs as the primary means of emissions reduction. There needs to be more balance to acknowledge the role that managing demand, improving travel efficiency and modal shift will have. For example, our model of 15 cities which included Erfurt, Grenoble, Utrecht and Bergen showed that a comprehensive cycle network can achieve emissions savings for transport of up to 15% (the rough quantum of this was later verified for Wellington with separate cycling demand modelling on Wellington’s proposed strategic cycling network).</p> <p>The full range of economic tools including pricing and taxes need to be available in order to encourage the shift from private vehicle use to other modes to address emissions but also congestion. This will necessitate some legislative and regulatory changes.</p> <p>Traffic demand management is difficult for Council to effect given the relative complexity of the congestion charging and fuel tax tools. One simple regulatory tool the Council has at its disposal is parking fees. However, the Land Transport (Offences and Penalties) Regulations 1999 (SR 1999/99) (as at 01 August 2020) Schedule 1 Offence provisions and penalties – New Zealand Legislation sets the penalties for parking offences. This schedule has not been updated since 27 February 2005. This is 16 years of price inflation that has not been captured, but more importantly restricts</p>																																



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			<p>Council's ability to increase the price of parking to support mode shift, as paying the penalty is cheaper than paying the fee. Amending the schedule could be done by the executive.</p> <p>Similarly cost recovery for providing parking to residents (resident's parking schemes) is limited to a simple cost recovery calculation under s 22AB(1)(o)(iii)(B) of the Land Transport Act 1998 Land Transport Act 1998 No 110 (as at 01 December 2020), Public Act 22AB Road controlling authorities may make certain bylaws – New Zealand Legislation. This prevents the true opportunity cost, and externalities of parking to be captured and passed on to personal vehicle owners.</p> <p>The report should also acknowledge that there are different timeframes for implementing step changes in active transport versus public transport. The ability to deploy “trial style” active transport investments means they can create impact within a single emissions budget as opposed to public transport changes that may span multiple budgets.</p> <p>Creating the scale of mode shift to active and public transport required will need a multi-pronged approach that:</p> <ul style="list-style-type: none"> <li>- provides local authorities with the level of infrastructure investment required;</li> <li>- supports a compact urban form;</li> <li>- removes regulatory barriers;</li> <li>- reduces public transport fares; and</li> <li>- empowers local authorities to put in place pricing signals to encourage modal shift.</li> </ul> <p>We strongly support the recommendations included in <u>Necessary action 2</u>, however we would encourage the Commission to change this recommendation to <b>time critical</b>. We have the following comments:</p> <ul style="list-style-type: none"> <li>- 2a – Specific and timebound targets for public, active and shared transport modes – we consider the Commission should go further and be specific about some actual goals to include in the GPS and the National Land Transport Programme. This would be consistent with the level of specificity included under EV actions. For example, we would recommend that Waka Kotahi be instructed to commit a higher portion of their overall transport funding for active and public transport projects.</li> <li>- 2b – The <b>increase in central government funding</b> for transport projects that reduce emissions should be significant as current funding levels will not support the changes needed to develop the transport network envisaged by the Commission.</li> <li>- 2c – Public transport subsidies and improved quality and integration – subsidies should be applied to all users of public transport. There is strong evidence that reducing fares increases public transport patronage. The current national farebox recovery policy (requiring no more than 50% subsidy) is arbitrary and contrary to climate reduction goals. This setting makes it extremely difficult for places with currently low patronage levels to build up attractive public transport systems. <b>The national farebox recovery policy should be removed and the GPS should increase funding levels for PT fare subsidies.</b></li> <li>- 2d - We support the recommendation to “encourage” Councils to implement first and last kilometre travel solutions in their transport networks, however in our view this is not strong enough. We would like a more concrete recommendation to ensure these are successful, appropriately funded and uniform across the country, and suggest replacing the word “encourage” with the phrase “partner with Councils”. It would also be appropriate to have specific targets for Waka Kotahi as the enabler for these solutions.</li> <li>- 2e – We are aware of the trends that are increasing the number of Wellington residents who are regularly working from home and support the climate benefits of that, however this <b>should also include flexible working</b> as this has the potential to reduce demand on public transport networks at peak time, improving the utilisation and cost effectiveness of these networks, and more efficient utilisation of the CBD with more consistent footfall and retail spending across day- and night-time periods. Having a strong, vibrant central city is critical to our region and relies on people living, working, visiting, recreating and shopping in it in it. We are focused as a city on reducing required travel distances (through compact form) and decreasing the carbon intensity of their commuting trips. We note that Wellington City residents are already the largest users of walking, cycling and public transport in the country.</li> </ul> <p>There are also some additional actions relating to pricing and the removal of regulatory barriers that could be added to <u>Necessary action 2</u>, as <i>time critical</i> actions, that would further strengthen central government's support for an integrated national transport network:</p> <ul style="list-style-type: none"> <li>- Support the promotion of car share schemes as a convenient alternative to car ownership (Wellington City's two car share providers have enjoyed a significant increase in membership over the last year).</li> </ul>

Section/topic	Question	Support/ agreement	Overall answer
			<ul style="list-style-type: none"> <li>- Enable the full range of economic tools, including <b>pricing and taxes</b>, that need to be available in order to encourage the shift from private vehicle use to other modes to address emissions but also congestion. In particular we need the ability to apply congestion charging as well as to appropriately price parking and parking infringement (by removing caps) as key measures to discourage private vehicle usage. We would also like to see the use of fringe benefit tax to be used more broadly.</li> <li>- An additional recommendation should be added to require government to identify and reduce regulatory barriers to the delivery of a low emissions transport system. One example of this is the cumbersome <b>traffic resolution process</b> which requires extensive consultation for relatively small changes to transport infrastructure such as moving or removing a single on-street car park. We would like the Commission to recommend that the traffic resolution process be reviewed as a matter of priority.</li> <li>- Currently, construction market capacity to deliver cycleways is constrained. An additional <b>recommendation could be added that central and local government work with the Infrastructure Commission to build up the construction supply side</b> to enable quicker, faster implementation of infrastructure to meet mode shift aspirations. In particular, there needs to be investment into the project management and contract skills required to deliver transport projects, as well as the mechanisms available to the industry to streamline procurement. Covid-19 has also resulted in a difficulty in obtaining construction materials from overseas – we now need to look at how we source materials locally to limit our need to have things brought in by ship. These constraints also apply to public transport infrastructure.</li> <li>- In addition to increasing subsidies for public transport, we note the link between this recommendation and <u>Necessary action 16</u> regarding behaviour change. “Encourage switching to walking, cycling and public transport” will need to include making these forms of transport safer and more accessible (through increased infrastructure spending), more affordable (through incentives including increased public transport subsidies) and more attractive (through behaviour change campaigns).</li> </ul> <p>Finally, <u>Necessary action 3g</u>, that refers to taking an equitable transitions approach to climate action related transport policy, should focus not just on the impacts of transitioning the light vehicle fleet to electricity, but also the required mode shift from car travel to public transport, cycling and walking.</p> <p><b>Reducing travel demand</b> In addition to our support of <u>Necessary action 2e</u>, we also note the role of <u>Necessary action 10</u> – Urban form. Ensuring our cities are compact is essential to reducing required transport distances, as is ensuring more residents have access to cost-effective public transport, and safe cycling and walking routes, through high quality urban design and place planning.</p> <p>This action should be shifted to be a part of the Transport section under “Reduce travel demand” and “<b>Prioritise compact urban form in spatial planning</b>”. This would acknowledge that urban form and transport emissions are interdependent, and would recognise the role compact urban form has in reducing travel demand, which then allows for transport solutions that support better urban design outcomes, including low-carbon travel.</p> <p><b>Accelerating the uptake of light electric vehicles</b> We strongly support the package of recommendations and actions included in <u>Time-critical necessary action 2</u> and <u>Necessary action 3</u>. As stated above, however, we feel the transport recommendations are too heavily weighted to supporting the transition to electric vehicles, and that not enough of the recommendations are in support of mode shift to active and public transport, and reducing travel demand through compact urban form and flexible working.</p> <p>We strongly support <u>Time-critical necessary action 2</u>, with the following comments:</p> <ul style="list-style-type: none"> <li>- 2a – The time limit on light vehicles with internal combustion engines entering, being manufactured, or assembled in Aotearoa, other than in specified exceptional circumstances, should be 2030 rather than 2035, which aligns with our advocacy on this issue.</li> <li>- 2b – The package of measures to support electric vehicle availability and price is not specified, and should also cover electric bikes.</li> <li>- 2c – No comments</li> <li>- 2d – Successful implementation of the charging infrastructure plan will require local delivery partners. Central government will need to work with private businesses, electricity distribution companies and local government bodies, as well as consult with electric vehicle owners, to both develop and execute the plan.</li> </ul> <p>We support <u>Necessary action 3</u>, with the following comments:</p> <ul style="list-style-type: none"> <li>- 3d – We <b>strongly support changes to the tax system</b>, and the recommendation should explicitly refer to the removal of the FBT incentive on ICE vehicles (particularly utes) and shifting the incentives to electric vehicles.</li> </ul>

Section/topic	Question	Support/ agreement	Overall answer
			<ul style="list-style-type: none"> <li>- 3f – The pricing structure of FBT, road user chargers, petrol tax, and funding for transport projects will need to be significantly overhauled to ensure that low emissions transport is incentivised and funded. It is not sustainable to have the funding for low carbon transport projects reliant on sources of funding that will reduce over time if the transport projects are successful. Care should be taken, however, not to remove charges on ICE vehicles.</li> </ul> <p><b>Local government would also like access to additional pricing mechanisms</b> such as congestion charging, and the removal of caps on parking price mechanisms, to enable us to disincentivise travel by car in favour of other travel modes, and to assist with funding low-carbon transport projects.</p> <ul style="list-style-type: none"> <li>- 3g – Taking an equitable transitions approach to climate action related transport policy should focus not just on the impacts of transitioning the light vehicle fleet to electricity, but also the required mode shift from car travel to public transport, cycling and walking.</li> </ul> <p>The Commission should consider including a recommendation to <b>accelerate the uptake of e-bikes</b> (alongside new cycle network infrastructure) by subsidising the up-front purchase cost, partnering with local suppliers to smooth freight supply issues, and funding the quicker roll-out of associated charging and secure parking facilities.</p> <p><u>Evidence:</u></p> <ol style="list-style-type: none"> <li>1. <a href="https://road.cc/content/news/e-bike-riders-quadruple-cycling-distance-finds-study-277059">https://road.cc/content/news/e-bike-riders-quadruple-cycling-distance-finds-study-277059</a> Summary: Study from Oslo, Norway, finds large increases in cycling among people who purchased e-bikes relative to a control group of people who were interested in buying one but who had not done so yet. Oslo is comparable to Wellington in cycle commuting mode share (Oslo 6%, Wellington 4%). Key finding: “It turned out that positive results of previous trials were replicated over a longer period of time emphatically, with e-bike owners increasing their bicycle use from 2.1 kilometres to 9.2 kilometres a day on average over the time period. There was also a big change in how many trips were taken by bike compared to other modes of transport such as driving, walking or public transport, with the e-bike owner group taking 49% of all journeys by e-bike compared to 17% before their purchase.”</li> <li>2. <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7456196/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7456196/</a> Summary: Academic review article looking at evidence on the impact of e-cycling on travel behaviour. Key finding: “The evidence suggests that e-bikes increase the total frequency and distance travelled by bicycle and promote longer individual cycle trips, compared to a conventional bicycle. E-bikes appear to substitute for 23–72% of conventional bike journeys and 20%–86% of private cars journeys.”</li> </ol> <p>WCC supports all of <u>Necessary action 4</u>. We note that this recommendation is a bit light, particularly on aviation considering the importance of air travel for transporting tourists to New Zealand, and our reliance on air travel to stay connected to each other domestically. We recommend that the Commission add a recommendation that government support the electrification of domestic air travel and provide incentives to airlines and domestic airports to enable that.</p>
<b>15. Energy</b>	Do you support the package of recommendations and actions for the heat, industry and power sectors? Is there anything we should change, and why?	<b>Partially support</b>	<p><b>Energy sources and industrial heat</b></p> <p>Wellington City’s emissions have fallen by 7% over the last 20 years, and a significant contribution to that has been the increase in low-carbon, renewable energy in the national electricity grid. We are strongly supportive of any recommendations that will continue that trend, and the de-carbonisation of other sources of energy, and the decarbonisation of industrial heat.</p> <p>As such, we broadly support:</p> <ul style="list-style-type: none"> <li>- <u>Time-critical necessary action 3</u>: Target 60% renewable energy no later than 2035</li> <li>- <u>Necessary action 5</u>: Maximise the use of electricity as a low emissions fuel</li> <li>- <u>Necessary action 6</u>: Scale up provision of low emissions energy sources</li> <li>- <u>Necessary action 7</u>: Reduce emissions from process heat</li> <li>- <u>Necessary action 8</u>: Support innovation to reduce emissions from industrial processes</li> </ul> <p><b>Building energy</b></p> <p>There is a tension for local government between housing affordability and housing quality. Attracting developers to build more housing in Wellington City is vital to increasing supply of housing and lowering prices, however our need for more housing reduces our ability to influence developers to build to a</p>

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			<p>higher standard than the current building code. It is vital that central government take up the challenge of increasing the national standards that new buildings and refurbishments are required to meet.</p> <p>We support <a href="#">Necessary action 9</a> with the following comments:</p> <ul style="list-style-type: none"> <li>- 9a – We expect to see a significant improvement in the building code for all buildings to incorporate carbon considerations but also to substantively improve the quality of our buildings, particularly residential. We would like it noted, however, that improving New Zealand’s existing residential housing stock will not significantly reduce emissions, as residents move from rationing their heating to fit within their budget, to being able to achieve greater heating outcomes for the same amount of input energy. New builds though have the potential to save emissions through significantly better design. Healthier homes are part of broader social challenge that also includes housing affordability, low incomes, and energy hardship. These issues need to be addressed in a holistic manner by central government and through the appropriate forums, in addition to being part of this advice. There is potentially more opportunity for carbon reduction in commercial and public building stock.</li> <li>- 9b – We support the recommendation to introduce mandatory measures to improve the operational energy performance of commercial and public buildings. In the short term we recommend the mandatory disclosure of energy performance of public and commercial buildings to create visibility of the problem, enable building owners to be supported to make improvements, and provide tenants with an understanding of the true cost of leasing a building.</li> <li>- 9c – We agree that a date should be set after which no new natural gas connections are permitted, and where feasible, all new or replacement heating systems installed are electric or bioenergy. We agree this should be no later than 2025, and possibly earlier for public buildings. This will have a huge impact for building owners, and will need strong and clear guidance from cent govt. This should also consider support for building owners to transition away from natural gas prior to end of life replacement.</li> </ul> <p>The Commission could also consider recommending:</p> <ul style="list-style-type: none"> <li>- Disclosure of energy performance across residential properties. MBIE’s building for climate change programme is initially focused only on new buildings, so Energy Performance Certificates would go some way to encouraging the market to improve existing buildings. We note that research out of Europe has shown that for EPCs to be most effective, they should include energy use, financial implication, and CO2 contribution. This also has the added benefit of further educating consumers around climate change impacts.</li> <li>- Increased engagement and education to encourage more efficient use of energy and choices around heating and energy use, including communicating the relative cost-effectiveness of different energy-based heating choices.</li> <li>- Support long-term financing opportunities for building owners to make upgrades directly related to climate change (energy efficiency or adaptation) which could also include seismic and heritage upgrades. An example of this is the Better Building Finance in Australia. This should be accessible for commercial and residential buildings. This is being explored in a New Zealand context through the Ratepayer Financing Scheme (RFS), supported by WCC, LGNZ, Auckland Council and Tauranga City Council, and Hamilton City Council.</li> </ul> <p><b>Urban Form</b></p> <p>While we strongly support the recommendations outlines in <a href="#">Necessary action 10</a>, the role that compact urban form plays in reducing city emissions, particularly from transport, is not adequately emphasised in the Commission’s advice. This action should be shifted to be a part of the Transport section under “Reduce travel demand” and renamed “<b>Prioritise compact urban form in spatial planning</b>”. This would acknowledge that urban form and transport emissions are interdependent, and would recognise the role compact urban form has in reducing travel demand, which then allows for transport solutions that support better urban design outcomes, including low-carbon travel.</p> <p>Wellington’s urban wildness and compact form is part of our cultural and national identity, and an important part of our carbon reduction strategy. Wellington City’s spatial planning process, recognises that there needs to be a continuation of this shift away from urban sprawl and towards intensification and regeneration of urban areas, and that this will positively contribute to our climate action goals, as well as create liveable, low-carbon and natural experiences where residents can feel connected to a sense of place.</p> <p>Compact urban form allows people living in the inner city to walk and cycle, and opens up opportunities for those living in the outer suburbs to have access to zero carbon public transport. Empirical evidence (eg <a href="#">Ahlfeldt and Pietrostefani, 2019</a>) generally finds that overall urban density modestly reduces carbon emissions (their estimate was an elasticity of 0.07, meaning that doubling average density throughout a whole city would lead to a 7% reduction in carbon emissions. However, average density is a blunt metric and other studies that have looked at a wider range of built environment metrics (eg Ewing and Cervero, 2010; Tian et al, 2020) find that it is possible to generate larger impacts on vehicle travel demand and hence emissions.</p>

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			<p>There also appears to be a lack of analysis or understanding of the barriers that might exist to achieving low-carbon urban form. Some examples of where to investigate change are:</p> <ul style="list-style-type: none"> <li>• Inflexible and outdated regulation used to manage cities, for example the Land Transport Act, where Councils are required to run a consultation process and ultimately require the elected Council to remove individual on-street car parks;</li> <li>• Misalignment of central government road transport planning and regional and local government mode shift planning and investment; and</li> <li>• The interplay of Urban Development Authority legislation and achieving city-based climate outcomes.</li> </ul> <p>Urban form is the responsibility of local government. National guidance on spatial planning, for example through the National Policy Statement on Urban Development (NPS-UD), is a very good start towards enabling intensification, however it must be supported by government investment in active transport modes and public transport, and a commitment to investing in spatial planning (and the climate change related issues associated with that). Managing growth, the densification of the city, and urban form as a result of the NPS-UD is the role of the district plan and local government. Whilst there is some government funding and advocacy support, more could be done. National guidance on green space, water sensitive design, operational waste minimisation, car-parking regulations, national road planning approaches and standards etc would also be helpful.</p> <p>Specific to urban form, but reflective of the process for transport investment planning, it is apparent that although integrated planning is identified as the most efficient method for making transport investments (see <a href="https://www.nzta.govt.nz/assets/Uploads/PBC-intervention-hierarchy.pdf">PBC-intervention-hierarchy.pdf (nzta.govt.nz)</a>), this must be more robustly reflected in the planning and funding processes under the Land Transport Management Act 2003. This could be addressed through a requirement that decision makers adopting Regional Land Transport Plans and National Land Transport Plans “must be satisfied” that the investment is the most efficient method of providing transport options for future population growth. A requirement to use evidence that captures latent demand to balance the self-reinforcing effect of using resource consent data, which will simply continue to encourage urban sprawl, may support the necessary transformative change required in urban planning. This could be affected through executive government initiatives using the Government Policy Statements on Transport or Housing and Urban Development.</p>
<b>16. Agriculture</b>	Do you support the package of recommendations and actions for the agriculture sector? Is there anything we should change, and why?	No view	
<b>17. Forestry</b>	Do you support the package of recommendations and actions for the forestry sector? Is there anything we should change, and why?	<b>Strongly agree</b>	<p>We support the Commission’ approach to forestry particularly as it relates to permanent native forests.</p> <p>Wellington’s strong integration of biodiversity into urban areas (our “wildness”) is part of our cultural and national identity. Wellington’s urban wildness and compact design creates liveable, low-carbon and natural experiences where residents can feel connected to a sense of place. This is a drawcard for visitors and a significant reason why people choose to live and work here.</p> <p>The close proximity and accessibility of green space, the inner and outer green belts as well as our ecosanctuary, Zealandia provide significant social, cultural and mental wellbeing benefits to our residents and visitors alike.</p> <p>Our efforts to protect and enhance biodiversity within the City are now reaping rewards with the imminent reintroduction of Kiwi into the City and the ever-expanding territory of birds supported by Zealandia. This is providing a rich birdsong that is unique for a city our size.</p> <p>We have purposely included the changes in forestry (removals and new plantings) across our city within our greenhouse gas inventory. This creates another reminder of the function that our forests are providing both for the city and globally. Increasing this forest cover will be a key part of how we meet our target of Net Zero by 2050.</p> <p>We support the complete set of recommended actions relating to forestry which we consider will provide benefits for biodiversity and ongoing management of forests. The recommendations are also complimentary to the Predator Free 2050 initiative helping to expand pest management to new areas and introducing new species to be controlled.</p>

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			We ask the Commission to also factor in mixed planting with selective exotic hardwood species introduced to provide both a carbon sequestration benefit but also an economic return to help fund the long-term establishment and management of native forests.
<b>18. Waste</b>	Do you support the package of recommendations and actions for the waste sector? Is there anything we should change, and why?	<b>Partially support</b>	<p>There is an important discussion to have in New Zealand about waste. Waste has both physical impacts, in that much of our waste will still be intact in landfills for hundreds of years to come (and may never break down), and carbon impacts from the creation of these goods, shipping, and the methane produced as the organic components of our waste breakdown.</p> <p>Waste is inherently wasteful – we need to reduce consumption, and buy items that can last, be repaired, be handed down, and at the end of their life rot into soil. To achieve this, we will need to start producing goods differently, consuming differently, consuming less, and treating all materials as a resource that has value. We therefore support the recommendation to measure and increase the circularity of the economy by 2025 (<a href="#">Necessary action 13c</a>), even though our consumption of goods imported into New Zealand is not included on our national inventory, as in our view this is an opportunity for New Zealand to contribute as a developed nation to do more than the global average (a principle of the Paris Agreement).</p> <p>In addition to this increased focus on <i>all</i> waste, and moving from an economy that creates landfill waste to a circular economy, we would like to see more specificity in the recommended actions to prioritise waste streams that generate emissions. In particular, we would like to see the waste levy specifically targeted at reducing emissions from waste by preventing organics from entering landfills in the first instance. We would also like to see the Ministry taking a more assertive role in linking the waste levy fund to emissions reduction, and being more active in driving the strategy around waste streams that produce emissions. For example, it would be good to see organic waste specifically referenced, with a greater emphasis on discouraging organic waste from entering landfills in the first instance, augmented by planning and financial support for low emissions organic waste reduction, reuse and disposal. The commission should provide more detail on the interventions needed to achieve this, such as mandating separate collection of organics, banning organic waste from landfill, or diverting more organic waste to local and regional composting. The Commission should also recognise that local communities may prefer to build soil and sequester carbon through decentralised local composting systems (rather than centralised anaerobic digestion) and find ways to incentivise councils to work with communities to collaborate on solutions.</p> <p>Our specific comments on the recommendation under <a href="#">Necessary action 13</a> include:</p> <ol style="list-style-type: none"> <li>Waste is not homogeneous and we think for the purposes of this action it would be useful to have binding waste reduction targets differentiated by waste streams, including a focus on waste streams that generate harmful greenhouse gases.</li> <li>We agree that a greater proportion of waste levy revenue needs to be focused on reducing emissions. We would also like to see revenue invested in systems and infrastructure that support local government and their communities to work at the <i>top</i> of the waste hierarchy to prevent and reduce waste in the first place and grow the re-use economy. The Government needs to invest in collaborations with local govt, or community-scale solutions, as well as small and medium business innovators who are driving change. It would also be worth mentioning construction and demolition waste specifically (a significant waste source in Wellington) as we assume that much of this waste is organic (and therefore high in emissions) and could be of high value to the community for re-use schemes.</li> <li>We agree that measuring and increasing the circularity of the economy is critical. One of the most impactful opportunities would be to prioritise the creation of circular food and soil regeneration solutions, to prevent organic waste streams. We would encourage the Commission however to not focus solely on prioritising waste streams that contribute the most to emissions as measured under our NDC. A circular economy approach incorporates accounting for the emissions of waste using a consumption-based emissions methodology, capturing the lifecycle of products and materials, including the embodied emissions generated offshore and the significantly higher emissions cost of consuming short-lived consumer goods. Recycling and food packaging must also be a priority to find closed loop recycling systems and focus on solutions higher up the waste hierarchy. The report '<a href="#">The Circularity Gap</a>' is clear on the relationship between the global carbon challenge and achieving a higher level of circularity. "Through smart strategies and reduced material consumption, we find that the circular economy has the power to shrink global GHG emissions by 39% and cut virgin resource use by 28%. Within this, the societal need of Housing delivers half of the impact, while Mobility and Nutrition account for much of the rest." The report has calculated that doubling the current rate of circularity in the economy from 8.6% to 17% would be sufficient to meet the goal of a 2 degree warmer world.</li> <li>We support product stewardship schemes being widened, and recommend that significant thought given to how to make these schemes more effective. Since the legislation was introduced, 1.3m tonnes have been diverted using these schemes. During that same period, we estimate 32.5m tonnes have entered official landfills, and an unknown amount into unofficial fills. The Commission's advice should also include recommending that the government strengthen its approach to product stewardship to ensure materials are kept in circulation, product</li> </ol>

Section/topic	Question	Support/ agreement	Overall answer
			<p>lifespans are extended and products prioritised according to the waste hierarchy, as well as put in place policies to ensure that products that cannot be effectively reused, repaired, recycled or composted should be designed out of the economy.</p> <p>e. We strongly agree that waste data needs to be improved. If we don't measure it we can't manage it. This needs to extend beyond the current list of municipal landfills to include all other fills in New Zealand.</p> <p>We would also like to reiterate our support for <u>Necessary action 3e</u> that central government work with the private sector to roll out EV battery refurbishment, collection and recycling systems to support sustainable electrification of light vehicle fleet.</p> <p><u>Necessary action 14</u> - We strongly support the HFC recommendations</p>
<b>19. Multisector strategy</b>	<p>Do you support the package of recommendations and actions to create a multisector strategy? Is there anything we should change, and why?</p>	<b>Partially support</b>	<p><b>Integrate Government policy making across climate change and other domains</b>  We strongly support <u>Necessary action 15</u> to integrate government policy making across climate change and other domains. As a local government working under a national policy framework, we welcome any improvements to ensure that there is clarity and consistency in the signals from government in respect to the transition to low emissions. We also support Taituarā's (the Society of Local Government Managers) recommendation that the Commission recommend that the government establish an interdepartmental executive board with responsibility for climate change as a time-critical action.</p> <p><b>Support behaviour change</b>  We support the premise of <u>Necessary action 16</u> to support behaviour change but we do not feel this has been given the level of priority or thought that other technology or policy and regulation-based actions have. Given that behaviour change, alongside technology, provides the basis for the climate scenarios that underpin the Commission's work we would have expected to see a stronger set of actions.</p> <p>We would like to see some specific recommendations from the Commission on how it sees behaviour change influencing emissions. These could include the creation of a national campaign to enrol the team of 5 million in the climate action challenge, envisioning a 2030 that is joyful, abundant, connected and zero carbon. This campaign should paint the vision of what our country could be, as opposed to what we need to "give up". It should also be the platform for engaging the public in specific behaviour changes.</p> <p>We would also like to see Government carry out more work to understand why the measures we have taken in the past haven't worked to change behaviour significantly. We need to better understand how we can incentivise behaviour change, particularly where good alternatives are already available. And behaviour change programmes need to be delivered in partnership with regional and central government (for example in transport) to be truly effective.</p> <p>Engaging the New Zealand public in climate action, combined with providing them the systems that support a zero-carbon society and economy, will get us there. This <a href="#">WRI paper</a> contains valuable insights on the role of behaviour change in climate action and the role central government can play.</p> <p>In addition to behaviour change, there is a need to equip New Zealanders with the life and personal skills necessary to take climate action for a low emissions economy and to be resilient to the impacts of climate action policies and climate change itself. We support Taituarā's (the Society of Local Government Managers) recommendation that this be added to <u>Necessary action 1</u>.</p> <p><b>Require entities with large investments to disclose climate related risks</b>  We strongly support <u>Necessary action 17</u>. Increased disclosures on climate relate risk help influence investment decisions and improve stakeholder understanding of their risk exposure.</p> <p><b>Align investments for climate outcomes</b>  We strongly support all of the actions listed under <u>Time-critical necessary action 6</u>.</p> <ul style="list-style-type: none"> <li>- 6a and 6b – The establishment of a long-term abatement cost or "shadow price" for emissions that is used consistently across central and local government as well as the private sector will greatly assist in ensuring climate is factored into cost-benefit analysis for investments. The challenge at present is that some organisations factor in abatement cost analysis while others do not.</li> </ul>

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			<ul style="list-style-type: none"> <li>- 6c – We also see the opportunity for the COVID-19 recovery package to help bring forward the types of transformational investment that is required to put us on a low emission pathway. This level of expenditure is unlikely to be repeated and it is essential that this money helps to stimulate carbon reducing activities.</li> <li>- 6d – Wellington City’s aspiration to be net zero carbon by 2050 will be dependent on businesses retiring emissions intensive assets early, so incentives for this are welcome.</li> <li>- 6e – As the owner of significant infrastructure assets, we are pleased to see the recommendation that the Infrastructure Commission include climate change as part of its decision- and investment-making framework, including embedded emissions and climate resilience. We would like to see their role in climate action strengthened by including in this recommendation that the Infrastructure Commission also support owners of infrastructure to apply climate action thinking to their decision and investment making processes.</li> </ul> <p><b>Building a Maori emissions profile</b> We strongly support <u>Necessary action 18</u> that iwi should be supported with funding and resourcing to participate and assert their rangatiratanga through emissions measurement and management.</p> <p><b>Driving low emissions choices through the NZ ETS</b> We support <u>Time-critical necessary action 7</u>.</p> <p><b>Continued ETS improvements</b> We support <u>Necessary action 19</u>. Proceeds from ETS unit auctions should be used to support an equitable transition and fund climate action. Industrial allocations need to be reviewed to ensure the current recipients are not free-riding. The avenues for voluntary carbon offsetting need to be redefined in the post Kyoto-Protocol rules era.</p>
<b>20. Rule for measuring progress</b>	Do you agree with Budget recommendation 5? Is there anything we should change, and why?	<b>Disagree</b>	<p>We disagree with <u>Budget recommendation 5d</u>.</p> <p>Under the Kyoto agreement, corporate funding of voluntary offsetting claims was channelled towards activities not covered by the agreement, creating additional carbon reduction activity that would not have otherwise occurred. In the Paris Agreement environment, all countries are part of the agreement. The NDCs are not sufficient to meet the Paris Agreement target, so there is a strong international desire that corporate funding is still channelled into additional activities, however the definition of these activities and international agreement as to how they will be measured and accounted for has not been reached. In the New Zealand context, using NZUs for voluntary offsetting claims, and then having these removed from the national inventory or budget, creates a stronger commitment from New Zealand than the 1.5C target legislated under the Zero Carbon Act. This would increase the economic burden on Aotearoa of climate action beyond that recommended by the Commission.</p> <p>We strongly believe that voluntary mitigation has an important role to play in decarbonising the country and achieving our emissions budgets and NDC. There is a need for corporations to be supported in their desire to take action, and their willingness to fund projects that might not otherwise happen. This corporate funding should be channelled in Aotearoa towards the achievement of our targets, not towards making those targets more stringent. Therefore, it is important that the government ensures that carbon offsetting claims are either renamed, or that their contributory nature is well understood by consumers, and that the claims have environmental integrity.</p>
<b>21. NDCs</b>	Do you support our assessment of the country’s NDC? Do you support our NDC recommendation?	<b>Do not support</b>	<p>While we agree with the Commission’s recommendations to strengthen the NDC we do not consider that “more likely to be compatible with.... limiting warming to 1.5°C” is sufficient. We would like to see the Climate Commission specify the exact reduction in net emissions that is required in the NDC to make it compatible with a 1.5°C pathway and our role as a developed nation. Your advice implies that this is a reduction of 44% (against 2005 levels). It would be good to see the Commission specifically recommend one of the options.</p> <p>With the future in mind we should also be starting to think about how we will approach our emissions profile that we have “outsourced”. If we were to seriously adopt a circular economy approach, reducing both the volume and carbon impact of imported goods, this could be a way for us to contribute more as a developed country. These “outsourced” emissions are not part of our national inventory (and therefore not captured by our NDC) however contribute to a significant carbon impact globally. It is likely that we will become accountable for these emissions at some point. Most of the developed world is in a similar position and there are already discussions emerging over carbon tariffs and ways to shift these emissions associated with production to the countries that are consuming the goods.</p>



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<b>22. Form of the NDC</b>	Do you support our recommendations on the form of the NDC?	<b>Support</b>	<p><u>Enabling NDC recommendation 1b</u></p> <p>The Commission could consider adding a recommendation that the government start to think about how we will approach our emissions profile that we have “outsourced”. If we were to seriously adopt a circular economy approach, reducing both the volume and carbon impact of imported goods, this could be a way for us to contribute more as a developed country. These “outsourced” emissions are not part of our national inventory (and therefore not captured by our NDC) however contribute to a significant carbon impact globally. It is likely that we will become accountable for these emissions at some point. Most of the developed world is in a similar position and there are already discussions emerging over carbon tariffs and ways to shift these emissions associated with production to the countries that are consuming the goods.</p>
<b>23. Reporting on meeting the NDC</b>	Do you support our recommendations on reporting on and meeting the NDC? Is there anything we should change, and why?	<b>Support</b>	We note that there are no mechanisms currently in place, nor international agreements on how to trade carbon across national borders, making offshore mitigation impossible for at least the next several years.
<b>24. Biogenic methane</b>	Do you support our assessment of the possible required reductions in biogenic methane emissions?	<b>No view</b>	