ORDINARY MEETING OF STRATEGY AND POLICY COMMITTEE AGENDA

Time: 9:30 am

Date: Thursday, 18 March 2021

Venue: Ngake (16.09)

Level 16, Tahiwi 113 The Terrace Wellington

MEMBERSHIP

Mayor Foster

Deputy Mayor Free

Councillor Calvert (Deputy Chair)

Councillor Condie

Councillor Day (Chair)

Councillor Fitzsimons

Councillor Foon

Councillor Matthews

Councillor O'Neill

Councillor Pannett

Councillor Paul

Councillor Rush

Councillor Sparrow

Councillor Woolf

Councillor Young

NON-VOTING MEMBERS

Te Rūnanga o Toa Rangatira Incorporated

Port Nicholson Block Settlement Trust

Have your say!

You can make a short presentation to the Councillors at this meeting. Please let us know by noon the working day before the meeting. You can do this either by phoning 04-803-8334, emailing public.participation@wcc.govt.nz or writing to Democracy Services, Wellington City Council, PO Box 2199, Wellington, giving your name, phone number, and the issue you would like to talk about. All Council and committee meetings are livestreamed on our YouTube page. This includes any public participation at the meeting.

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AREA OF FOCUS

The role of the Strategy and Policy Committee is to set the broad vision and direction of the city, determine specific outcomes that need to be met to deliver on that vision, and set in place the strategies and policies, bylaws and regulations, and work programmes to achieve those goals.

In determining and shaping the strategies, policies, regulations, and work programme of the Council, the Committee takes a holistic approach to ensure there is strong alignment between the objectives and work programmes of the seven strategic areas covered in the Long-Term Plan (Governance, Environment, Economic Development, Cultural Wellbeing, Social and Recreation, Urban Development and Transport) with particular focus on the priority areas of Council.

The Strategy and Policy Committee works closely with the Annual Plan/Long-Term Plan Committee to achieve its objective.

To read the full delegations of this Committee, please visit wellington.govt.nz/meetings.

Quorum: 8 members



TABLE OF CONTENTS 18 MARCH 2021

Busi	usiness Page							
1.	Mee	eting Conduct	5					
	1.1	Karakia	5					
	1.2	Apologies	5					
	1.3	Conflict of Interest Declarations	5					
	1.4	Confirmation of Minutes	5					
	1.5	Items not on the Agenda	5					
	1.6	Public Participation	6					
2.	Gen	eral Business	7					
	2.1	New Licence for new licensee under the Wellington Tow Belt Act 2016: Tanera Gardens Incorporated Presented by: Councillor O'Neill	n 7					
	2.2	Reporting back on public consultation of a new lease on Wellington Town Belt: Wellington Tennis Incorporated Presented by: Councillor O'Neill	15					
	2.3	Submission on Climate Change Commission draft report Presented by: Councillor Paul	19					
3.	Con	nmittee Reports	43					
	3.1	Report of the Finance, Audit and Risk Subcommittee Meeting of 10 March 2021 Presented by: Councillor Calvert	43					

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4.	Pub	51		
	4.1	Public Excluded Report of the Finance, Audit and Risk	E 2	
		Subcommittee Meeting of 10 March 2021 Presented by: Councillor Calvert	53	

Page 4 PUBLIC EXCLUDED

1. **Meeting Conduct**

1.1 Karakia

The Chairperson will open the meeting with a karakia.

Whakataka te hau ki te uru, Cease oh winds of the west

Whakataka te hau ki te tonga. and of the south

Kia mākinakina ki uta, Let the bracing breezes flow, Kia mātaratara ki tai. over the land and the sea.

E hī ake ana te atākura. Let the red-tipped dawn come

He tio, he huka, he hauhū. with a sharpened edge, a touch of frost,

Tihei Mauri Ora! a promise of a glorious day

At the appropriate time, the following karakia will be read to close the meeting.

Unuhia, unuhia, unuhia ki te uru tapu nui Draw on, draw on

Kia wātea, kia māmā, te ngākau, te tinana, Draw on the supreme sacredness te wairua To clear, to free the heart, the body

I te ara takatū and the spirit of mankind

Koia rā e Rongo, whakairia ake ki runga Oh Rongo, above (symbol of peace)

Kia wātea, kia wātea

Let this all be done in unity

1.2 Apologies

Āe rā, kua wātea!

The Chairperson invites notice from members of apologies, including apologies for lateness and early departure from the meeting, where leave of absence has not previously been granted.

1.3 Conflict of Interest Declarations

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

1.4 Confirmation of Minutes

The minutes of the meeting held on 11 March 2021 will be put to the Strategy and Policy Committee for confirmation.

1.5 Items not on the Agenda

The Chairperson will give notice of items not on the agenda as follows.

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Matters Requiring Urgent Attention as Determined by Resolution of the Strategy and Policy Committee.

The Chairperson shall state to the meeting:

- 1. The reason why the item is not on the agenda; and
- 2. The reason why discussion of the item cannot be delayed until a subsequent meeting.

The item may be allowed onto the agenda by resolution of the Strategy and Policy Committee.

Minor Matters relating to the General Business of the Strategy and Policy Committee.

The Chairperson shall state to the meeting that the item will be discussed, but no resolution, decision, or recommendation may be made in respect of the item except to refer it to a subsequent meeting of the Strategy and Policy Committee for further discussion.

1.6 Public Participation

A maximum of 60 minutes is set aside for public participation at the commencement of any meeting of the Council or committee that is open to the public. Under Standing Order 31.2 a written, oral or electronic application to address the meeting setting forth the subject, is required to be lodged with the Chief Executive by 12.00 noon of the working day prior to the meeting concerned, and subsequently approved by the Chairperson.

Requests for public participation can be sent by email to public.participation@wcc.govt.nz, by post to Democracy Services, Wellington City Council, PO Box 2199, Wellington, or by phone at 04 803 8334, giving the requester's name, phone number and the issue to be raised.

2. General Business

NEW LICENCE FOR NEW LICENSEE UNDER THE WELLINGTON TOWN BELT ACT 2016: TANERA GARDENS INCORPORATED

Purpose

 This report asks the Strategy and Policy Committee for approval for officers to publicly consult on the grant a new community garden licence for Tanera Gardens Incorporated.

Summary

- 2. Tanera Garden Incorporated (TGI) was formed by a group of community gardeners who wish to continue to run the Tanera Community Garden.
- 3. The garden was previously run by the Mokai Kainga Trust; however, the Trust no longer has the capacity to manage the garden. Mokai Kainga has gifted the equipment (mowers, sheds etc) to TGI to continue with the maintenance of the garden.
- 4. The proposed licensed area measures approximately 2,387 sqm and rent is charged at a peppercorn rate. The proposed garden licence is a continuation of an existing use and will formalise the responsibilities of Council and TGI in the management of the garden.
- 5. The proposed licence terms and conditions are set out in this paper and are based on officers' assessment of the groups' applications using the assessment criteria in the Leases Policy for Community and Recreation Groups (Leases Policy), the Wellington Town Belt Act 2016 (WTBA) and the Wellington Town Belt Management Plan (the Management Plan). See supporting information for links to documents.
- 6. Based on the officers' assessment, this report seeks Committee approval to carry out public consultation on the granting of a new community garden licence for a three-year term with one renewal term of five years to Tanera Garden Incorporated. This term is consistent with Council's Guidelines for Community Gardens.

Recommendation/s

That the Strategy and Policy Committee:

- 1. Receive the information.
- 2. Approve that officers publicly consult on granting a new community garden licence for a three-year term with one renewal term of five years to Tanera Garden Incorporated on land, measuring approx. 2,387 sqm, which is part of the Wellington Town Belt

Item 2.1 Page 7

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known as Tanera Park, more particularly described as Part Lot 1 Deposited Plan 10508 in Computer Register WN608/4 for a peppercorn rental.

- 3. Note that the new licence will include the following Special Provisions:
 - a. The Council will pay the first \$300 of metered water per annum (exclusive of GST).
 - b. No cooking or preparing food on site.
 - c. The Licensee is prohibited from erecting any fences or buildings on the Licensed Area.
 - d. The Licensee must obtain Council approval in writing before erecting any signs or placing any seating in the Licensed Area.
 - e. The Licensee shall provide Council with their site-specific Health and Safety Plan and update as required.
- 4. Note that approval to grant licences on Wellington Town Belt is conditional on:
 - Appropriate iwi consultation;
 - Public consultation as required under section 16 of the Wellington Town Belt Act 2016
 - No sustained objections resulting from the above consultation and notification;
 - Legal and advertising costs being met by the Lessee (where applicable)

Background

Tanera Garden Incorporated (TGI)

- 7. The Tanera Community Gardens was established in 1991 for low-income families and community organisations to grow organic vegetables. They were managed by the Mokai Kainga Trust. The garden area in Tanera Park has been used as a community garden for over 30 years.
- 8. The garden is approximately 2,387 sqm (see attachment 1).
- 9. When the caretaker died in 2019, Mokai Kainga Trust did not have a replacement caretaker and the current gardeners took over the maintenance and responsibilities of the garden.
- 10. Council officers have reached out to Mokai Kainga who have expressed that they no longer have the capacity to manage the garden.
- 11. In 2020, Council contacted the main gardeners who had expressed interest in continuing with the garden. They began work organising a committee and setting up an incorporated society in order to apply for a licence.
- 12. The Tanera Garden Incorporated (TGI) is a new entity however the committee members have been involved with the garden for between 3 and 8 years, with a combined involvement of about 36 years. The longest-standing gardener has been gardening for about 15 years and is supportive of TGI.

Page 8 Item 2.1

- 13. The garden has always been well maintained and has the support of the community around it.
- 14. In November 2020, TGI was incorporated and in January 2021 completed the application for a licence. Council officers assessed the application using the criteria in section 7 of the *Leases Policy for Community and Recreation Groups* and the provisions of the WTBA and the Wellington Town Belt Management Belt (the Management Plan).
- 15. This is an established garden that has been existence for about 30 years. The group is new, and an initial term of three years will allow Council officers to review the governance before allowing a longer five-year term at renewal.
- 16. Three to five years is recommended as an appropriate term for community gardens under the Community garden, beehives and composting systems licence Guidelines.

Discussion

- 17. The WTBA permits the Council to grant licences in respect of the Wellington Town Belt and sets out requirements and limits. This enables appropriate protection of the open space and natural values of the Wellington Town Belt as intended in the original Deed and articulated in the WTBA and management plan.
- 18. Under the Community Garden Guidelines, applications must be assessed against the seven criteria found in the Leases Policy:
 - a. Strategic fit
 - b. Group's organisational structure
 - c. Membership sustainability
 - d. Financial and maintenance obligations
 - e. Optimal use of resources
 - f. Environmental impact
 - g. Demonstrated need from the community.
- 19. The information submitted by TGI was assessed as performing satisfactorily under each of these above criteria:
 - **A. Strategic Fit** The group's purpose and activities must be consistent with the Council's strategic direction to promote healthy lifestyles and build strong communities.
- 20. The garden offers the community a place to congregate and work together toward the same goal.
- 21. Gardening as an activity contributes to the overall health and wellbeing of the gardeners and the wider community.
 - **B. Group's organisation structure** *The group must be an incorporated society or trust.*
- 22. Tanera Garden Incorporated was incorporated on 27 November 2020 with NZ Inc Societies number 50054673.

Item 2.1 Page 9

- **C. Membership sustainability** The group must be sustainable in terms of membership and/or users of the service for the term of the licence.
- 23. Committee members have been involved with the garden for periods between 3 and 8 years, with a combined involvement of about 36 years. The longest-standing gardener has been gardening for about 15 years and is supportive of TGI. TGI operates an open membership policy and is welcoming of new members.
 - **D.** Financial and maintenance obligations The group must be in a financial position to fulfill its licence obligations for the term of the licence, including but not exclusive to rent, insurance and building and grounds maintenance.
- 24. The proposed licence is for a peppercorn rent.
- 25. The group owns their equipment and maintenance is managed through successful working bee sessions.
 - **E. Optimal use of resources** The land and/or buildings must be utilised to the fullest extent practicable.
- 26. Officers believe that the proposed licensed area will optimise the use of Tanera Park and support a holistic approach to nature allowing a space for the community to appreciate the environment.
 - **F. Environmental impact** The activity cannot have the potential to adversely affect open space values or other legitimate activities.
- 27. The garden is an existing site with no buildings and no further development proposed. As such it has minimal effects on the surrounding area.
 - **G. Demonstrated need from the community** There must be demonstrated support and need within the community for the activity.
- 28. The Community is very supportive of the garden and have been so for the past 30 years. TGI will help organise the activity to ensure that everyone has equal opportunity to join in the gardening.

Next Actions

- 29. If the recommendations in this report are accepted the following will occur:
 - Public consultations of the proposed licence as required under the Wellington Town Belt Act 2016;
 - The outcome of consultation will be reported back to Committee;
 - The Committee's recommendations will be referred to the Council for approval;
 and
 - If the Council approves the licence, the licence documentation will be negotiated, drafted, and signed.

Page 10 Item 2.1

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Attachments

Attachment 1. Tanera Park - Proposed licensed area 😃

Page 13

Author	Fel Go, Community Recreation Leases Advisor
Authoriser	Peter Clinton, Sport and Club Partnership Lead
	Sarah Murray, Customer and Community Partnerships Manager
	Paul Andrews, Manager Parks, Sports & Rec
	Claire Richardson, Chief Operating Officer

Item 2.1 Page 11

SUPPORTING INFORMATION

Engagement and Consultation

Public consultation will be undertaken as required under section 16 of the Wellington Town Belt Act 2016.

Treaty of Waitangi considerations

There are no specific Treaty of Waitangi considerations however granting leases and licences on Wellington Town Belt is conditional on appropriate iwi consultation.

Financial implications

There are no significant financial considerations.

Policy and legislative implications

The Council assesses any application for a new licence on Wellington Town Belt under the requirements of the:

- Wellington Town Belt Act (WTBA) 2016 link to Wellington Town Belt Act 2016
- Wellington Town Belt Management Plan 2017 <u>link to Wellington Town Belt</u>
 Management Plan
- Leases Policy for Community and Recreation Groups 2012 <u>link to Leases Policy</u> for Community and Recreation Groups
- Community garden, beehives and composting systems licence Guidelines and application process - <u>link to Community Garden Application Form</u>

Risks / legal

There are no significant risks regarding this licence.

Climate Change impact and considerations

There are no specific climate change impacts and considerations.

Communications Plan

Not applicable.

Health and Safety Impact considered

TGI are required to submit a site-specific health and safety plan as part of the licence.

Page 12 Item 2.1

Me Heke Ki Põneke



Mokai Kainga Maori Centre

REPORTING BACK ON PUBLIC CONSULTATION OF A NEW LEASE ON WELLINGTON TOWN BELT: WELLINGTON TENNIS INCORPORATED

Purpose

1. This report details the outcome of public consultation on a lease for Wellington Tennis Incorporated and three subleases, and requests the Strategy and Policy Committee to recommend that Council approves the lease and three subleases.

Summary

- 2. Strategy and Policy Committee approval was given to publicly consult on:
 - a new ground lease to the Wellington Tennis Incorporated (WTI) for a ten-year term with one renewal term of ten years;
 - Three subleases to:
 - Tennis Central Region Incorporated for a ten-year term with one renewal term of ten years;
 - o Kaizen Academy Seido Karate for a ten-year term with one renewal term of ten years, subject to the engineering report findings on the North Stand and pavilion, and Kaizan Academy Seido Karate becoming incorporated; and
 - o PlanitPro Limited for a ten-year term with one renewal term of ten years, subject to annual reviews with the Lessee.
- 3. There have been no objections to the lease and subleases.
- 4. Based on Officers' assessment and the outcome of the public consultation, it is recommended that the Committee recommends that the Council approves the lease and three subleases with conditions, under the Wellington Town Belt Act 2016.

Recommendation/s

That the Strategy and Policy Committee:

- 1. Receive the information.
- 2. Recommends to the Council that it grants a new ground lease to Wellington Tennis Incorporated for a ten-year term with one renewal term of ten years and three subleases for Tennis Central Region Incorporated, Kaizen Academy Seido Karate and PlanitPro Limited each for a term of ten years with a right of renewal for another ten years. The land is legally described as Section 1 Survey Office Plan 474197 containing 1.5865 hectares more or less.
- Notes that the new lease will be in accordance to the Wellington Town Belt Act 2016, Wellington Town Belt Management Plan and Leases Policy for Community and Recreation Groups.

Item 2.2 Page 15

Background

- 5. The paper asking the Strategy & Policy Committee to approve public consultation for a new lease for Wellington Tennis Inc was presented and ratified on 17 September 2020 (see https://wellington.govt.nz/-/media/your-council/meetings/committees/strategy-and-policy-committee/2020/17-sep/2020-09-17-agenda-spc.pdf).
- 6. The annual ground lease is \$4,930.20 (plus GST) as per the rental determination formula in the Community Recreation Leases Policy.
- 7. Public consultation was carried out between 22 September and 6 November 2020.
- 8. An advertisement was placed in the Public Notices of the Dominion Post on Wednesday 30 September 2020. Letters were sent to the Greater Brooklyn Residents' Association Inc, Friends of Town Belt, the Port Nicholson Block Settlement Trust and Te Runanga o Toa Rangatira Incorporated.
- 9. Details about the lease were also placed on the "Have your Say" section of the Council website (https://wellington.govt.nz/have-your-say/public-inputs/public-notices/closed/other/lease-proposal---town-belt-land)
- 10. Council received one positive response in support of the application from the Greater Brooklyn Residents' Association:

"Thank you for emailing this through to us for our information. I believe that this is a logical and sensible decision to extend the lease on this popular and well used community facility. While not tennis players, we support the continuation of this 10 year lease."

Next Actions

- 11. If the recommendations in this report are accepted, the following will occur:
 - a. The Committee's recommendations will be referred to the Council for approval; and
 - b. If the Council approves the leases, the lease documentation will be negotiated, drafted, and signed.

Attachments

Attachment 1. Wellington Tennis Inc - Leased Area &

Page 18

Author	Fel Go, Community Recreation Leases Advisor
Authoriser Peter Clinton, Sport and Club Partnership Lead	
	Sarah Murray, Customer and Community Partnerships Manager
	Paul Andrews, Manager Parks, Sports & Rec
	Claire Richardson, Chief Operating Officer

Page 16 Item 2.2

SUPPORTING INFORMATION

Engagement and Consultation

Consultation was conducted in accordance to the Wellington Town Belt Act 2016.

Treaty of Waitangi considerations

Letters notifying of the intention to enter a new lease on Town Belt were sent to the Port Nicholson Block Settlement Trust and Te Runanga o Toa Rangatira Incorporated.

Financial implications

Not applicable.

Policy and legislative implications

This application is consisent with the Wellington Town Belt Act and Management Plan and the Community Recreation Leases Policy.

Risks / legal

Not applicable.

Climate Change impact and considerations

Not applicable.

Communications Plan

Not applicable.

Health and Safety Impact considered

The Leasee is required to provide a Health and Safety Plan to cover activities conduted under the Lease.

Item 2.2 Page 17

Me Heke Ki Põneke



SUBMISSION ON CLIMATE CHANGE COMMISSION DRAFT REPORT

Purpose

1. This report asks the Strategy and Policy Committee to review and approve for submission the attached documents in response to the Climate Change Commission's draft advice to the government.

Summary

- 2. Wellington City has set a goal of net zero carbon by 2050, as part of our declaration of a climate and ecological emergency in June 2019. As a Council, we have a significant role to play in enabling the City to achieve this goal, however we will also need a significant increase in central government policy, guidance and funding.
- 3. Overall, we are strongly supportive of the Commission's draft advice to the government, and in addition our submission calls upon the Commission to:
 - **Be more ambitious in setting budgets** the budgets need to reflect what is necessary rather than what is achievable. This will encourage innovation and ensure we are doing our fair share to put the world on a path to a 1.5°C target.
 - Increase the speed and scale of the transport recommendations greater mode shift can be achieved in relatively short timeframes with central government support, which would enable bigger emissions cuts and deliver a range of co-benefits.
 - **Prioritise the role of behaviour change** the team of five million has proven that we are capable of responding to a challenge where the need for action and the action required are both clearly communicated. Shifting behaviour will be an essential compliment to technological changes if we are to meet net zero by 2050.
 - Be clear that a significant increase in funding and support is required and that this is an investment well worth making.
 - Recognise the significance of local governments' contribution and role local government has a significant role in promoting and enabling climate action, and is a critical implementation partner for achieving central and local government targets. However local government's funding tools are limited.
- 4. Finally, we encourage the Commission to speak freely, to outline a bold vision for New Zealand's future, and to not hold back, as if we settle for what's probable and achievable, we may well fail to reach our target. And even worse, we may fail to respond to the climate emergency as the emergency it is.

Item 2.3 Page 19

Recommendation/s

That the Strategy and Policy Committee:

- 1. Receive the information.
- 2. Agree with the key points outlined above and in the cover letter.
- 3. Approve the cover letter and detailed submission response for submission to the Climate Change Commission on 26 March 2021.
- 4. Agree that the cover letter and detailed response be made available on Wellington City Council website on 19 March to assist others in drafting their submissions.

Background

5. The Climate Change Commission is legislatively required to provide advice to the government on how Aotearoa can meet it's 1.5C target under the Zero Carbon Act, specifically in regards to budgets, enabling policies, and specific measures to include in the government's emissions reduction plan. Their full advice is available at https://www.climatecommission.govt.nz/get-involved/our-advice-and-evidence/ and a summary of their recommendations is attached to this paper.

Discussion

6. In the context of Wellington City Council's strong focus on the climate emergency, and our need for significant increases in central government policy settings and funding, it is important for us to submit strongly on the Climate Change Commission's advice, in order to achieve our City net zero carbon by 2050 goal.

Options

7. We could choose not to submit, or to submit purely in support with no commentary, however not submitting strongly on the CCC's advice may mean that the advice is not sufficient for the City to reach its goal of net zero carbon by 2050.

Next Actions

- 8. The cover letter and detailed submission will be made available on our website on 19 March 2021
- 9. Our key points may be incorporated into a joint letter or submission from the Wellington Regional Climate Change Working Group.
- 10. Our cover letter and detailed submission will be submitted to the Climate Change Commission on 26 March 2021.

Attachments

Attachment 1. WCC's submission on the CCC advice - cover letter Page 23

Attachment 2. WCC's submission on the CCC advice - detailed answers Page 25

Page 20 Item 2.3

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Author	Alison Howard, Manager Climate Change Response
Authoriser	Liam Hodgetts, Chief Planning Officer
	Stephen McArthur, Chief Strategy & Governance Officer

Item 2.3 Page 21

SUPPORTING INFORMATION

Engagement and Consultation

This submission has been formed based on the views of officers across a wide variety of teams across Council. Officers have also been involved in conversations with officers from other councils, and attended a variety of information sessions from the Climate Change Commission. The key points of the submission were also discussed with the Climate Change Steering Group and the Youth Council.

Treaty of Waitangi considerations

The Climate Change Commission's advice addressed Treaty considerations directly, and we are supportive of their recommendations to government.

Financial implications

There are no financial implications in making the submission. We have already proposed funding for Te Atakura and a variety of climate action related funding in the LTP. The Commission's advice would not require us to increase our funding requirements.

Policy and legislative implications

The Climate Change Commission's advice recommends a variety of changes to central government policy and legislation, and we have also recommended additional changes.

Risks / legal

Minimal. This submission is in line with our public position on climate action.

Climate Change impact and considerations

This submission is about climate change.

Communications Plan

We plan to put the submission on our website on March 19th, and we will be issuing a press release closer to the time of the submission deadline.

Health and Safety Impact considered

Not applicable.

Page 22 Item 2.3

26 March 2021

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

Submission on Climate Action for Aotearoa

The Wellington City Council (WCC) welcomes the opportunity to provide feedback on the Climate Change Commission's first advice to government. This is a significant step in turning New Zealand's commitment to addressing the climate change emergency into both action and global leadership.

Strong action on climate change both globally and locally is essential for Wellington to continue to prosper as an attractive, innovative and creative city for residents, businesses and visitors. Wellington provides a low carbon lifestyle that is increasingly a factor for people choosing where they live and work. As a coastal city we are conscious of the potential impacts on our city if we do not significantly reduce global emissions.

WCC declared an ecological and climate emergency in June 2019 placing climate change front and centre of our decision-making. We supported our declaration with the release of an action plan. *Te Atakura, First to Zero* maps out a pathway to achieving net zero for our capital city by 2050. The plan recognises the need to support our vulnerable and lower income residents through this transition as well as taking opportunities to provide co-benefits for the environment, our communities and the local economy. Affordable housing, equitable transitions, and giving effect to Te Tiriti are all important objectives for us, and we were pleased to see these reflected in the draft advice.

Te Atakura is an ambitious plan aimed at meeting the expectations of our community that we would step up to the climate challenge. We are determined to play our role in the significant transformation that will be required to keep global warming below 1.5°C. At 2°C or 3°C, in all likelihood, we will lose the heart of our city to the sea. Therefore it is critical that Aotearoa contributes its share to achieving 1.5°C and demonstrates the kind of leadership that will help to inspire global action.

Wellington's pathway to net zero by 2050, as set out in *Te Atakura*, requires steep reductions in emissions by 2030. The city already has many of the building blocks in place with a compact urban form, investments in public transport and thriving urban biodiversity. Wellingtonian's are also up to the challenge and ready to apply the same creative, innovative and resilient traits that have helped create one of the world's most liveable cities. We have plans underway proposing to:

- Maintain our compact form whilst growing our population (though our 'Planning for Growth' adoption of a spatial plan and District Plan review processes);
- Significantly invest in new active and public transport through Let's Get Wellington Moving;
 and
- Through Te Atakura we are already using our strong local community and business relationships to take climate action locally, across transport, building energy, waste and our food supply.

There are however many areas of our emissions profile that we have little influence over and that is where we require central government to act. Our ask is that the Climate Change Commission uses its

advice to central government to put in place the supporting and enabling actions we need at a local level. The Climate Change Commission with its ability to make wide ranging recommendations to government provides a once in a lifetime opportunity to set the platform for change.

Our comments on the draft report reflect WCC's desire for the level of ambition and urgency on reducing emissions to align with the scale of the climate emergency. We are of the view the Commission should be advocating for a truly transformative approach over the next 15 years. This should recognise the need to transform the systems that govern our lives but must on also draw on what we learnt during our response to COVID-19 – that our team of five million are capable of a major shift in the way we live, work and play.

To create this shift, the Commission's final advice to government must address the following:

- 1. **Be more ambitious in setting budgets** the budgets need to reflect what is necessary rather than what is achievable. This will encourage innovation and ensure we are doing our fair share to put the world on a path to a 1.5°C target.
- 2. **Increase the speed and scale of the transport recommendations** greater mode shift can be achieved in relatively short timeframes with central government support, which would enable bigger emissions cuts and deliver a range of co-benefits.
- 3. **Prioritise the role of behaviour change** the team of five million has proven that we are capable of responding to a challenge where the need for action and the action required are both clearly communicated. Shifting behaviour will be an essential compliment to technological changes if we are to meet net zero by 2050.
- 4. **Be clear that a significant increase in funding and support is required** and that this is an investment well worth making.
- 5. Recognise the significance of local governments' contribution and role local government has a significant role in promoting and enabling climate action, and is a critical implementation partner for achieving central and local government targets. However local government's funding tools are limited.

Finally, it is critical that the Climate Change Commission makes the most of its independent role from Government, and provides evidence-based advice that reflects the level of aspiration needed to meet our national and global targets. We would encourage you to speak freely, to outline a bold vision for New Zealand's future, and to not hold back. Your advice should not take into account any perceived limit to political will, as it is a lack of political will that has stalled progress thus far. If we settle for what's probable and achievable, we may well fail to reach our target. And even worse, we may fail to respond to the climate emergency as the emergency it is.

We welcome the opportunity to discuss our comments directly with the Commission.

WCC Submission on the Climate Change Commission's draft advice

Section/topic	Question	Support/ agreement	Overall answer		
The pace of change:	Do you agree that the pace of change we have proposed would put Aotearoa on a path to meet the 2050 target?	Disagree	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.		
Future generations:	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?	Disagree	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 inherent a low carbon society and economy.		
Our contribution:	Do you agree with the changes we have proposed to make the NDC more likely to be compatible with the 1.5°C goal?	Disagree	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.		
Role and types of forests:	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?	Agree	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.		
Policy priorities to reduce emissions:	What are the most urgent policy actions needed to help meet our emissions budgets?	All	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: - addressing barriers (for example, reviewing regulatory requirements such as the traffic resolution process, and executing targeted and proven behaviour change programmes) - pricing (for example, putting in place congestion charging, increasing public transport subsidies) and - investment (for example, increased funding for public transport and cycling infrastructure). 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. 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. 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.		
Technology and behaviour change:	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?	Disagree	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. 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. 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 WRI paper contains valuable insights on the role of behaviour change in climate action and the role central government can play.		

Section/topic	Question	Support/ agreement	Overall answer
1. Principles	Do you support the principles we have used to guide our analysis? Is there anything we should change, and why?	Partially support	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.
			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.
			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.
			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.
			We also support the recommendation of Taituarā (the Society of Local Government Managers) that Commission use a Three Horizons approach more explicitly. Such an approach: 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;
			 clarifies the overall direction and destination, but at the same time it leaves space for new ways of getting to the destination to emerge; 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;
			 provides us with a frame for discussing how much effort and resource we should be putting into: maintaining the status quo (the legacy of the previous state) building infrastructure, services and processes to bring the preferred future into being
			 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 enables discussions to focus on how we make the transition from previous to future ways of doing things.
2. Emission budget levels	Do you support budget recommendation 1? Is there anything we should change and	Not ambitious enough	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.
	why?	ciio agii	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.
			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.
			We ask that the Commission revisits the budget levels to deliver a larger proportion of cuts over the next 15 years.
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	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.

Section/topic	Question	Support/ agreement	Overall answer
	removals from forestry? Is there anything we should change, and why?		
4. Offshore mitigation	Do you support budget recommendation 4? Is there anything we should change, and why?	Fully support	Onshore mitigation gives us the greatest opportunity to innovate and green our economy, competing on the world stage and bringing solutions to the world. 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. 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.
5. Cross-party support	Do you support enabling recommendation 1 on cross-party support for emissions budgets? Is there anything we should change and why?	Fully support	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.
6. Co-ordinate across Govt	,	Fully support	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. 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. 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.
7. Genuine acti and endurin partnership Maori		Fully support	We strongly support the creation of a genuine, active and enduring partnership with iwi/Maori that enables iwi/Maori to exercise rangatiratanga and kaitiakitanga. 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. 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.
8. Central and govt working together	,	Fully support	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. 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. To facilitate our role we look to the partnership with central government to provide: - useful tools that are based on international best practice and the experience of local government across New Zealand; - funding and support for pilots to enable faster learning; - a platform for sharing knowledge; and - standardised sets of data, measures and KPIs across both central and local government (e.g. greenhouse gas measurement).

Section/topic	Question	Support/ agreement	Overall answer
			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. 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.
			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.
9. Incorporate view of all NZers	Do you support enabling recommendation 5 on establishing processes for incorporating the	Partially support	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.
	views of all New Zealanders? Is there anything we should change and why?		In own our 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.
			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.
			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.
			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.
			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.
10. Focus on long- lived gases	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?	Fully support	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.
11. Focus on growing new native forests	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?	Partially support	We support the focus on building a long-term carbon sink through native planting on less productive land. 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.

Section/topic	Question	Support/ agreement	Overall answer					
					d planting where selective ex pnomic return to help fund the	-	introduced alongside native species to provide both	
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	This also undermines out to Zero Plan. The pathway needs to real the pathway evident in the pathway improving travel efficient worse risks entrenching public pressure to relieve on-street car parking to the pathway improving travel to relieve on-street car parking to the pathway improving travel to relieve on-street car parking to the pathway improving travel demand revised path for road travel demand revised path for road travel	ecognise that the way appears to be overly described for transported and modal shift with the also run the rist of private motor vehice accommodate more continuous to improve travel efficitation that is the Commission consumports an assure ansport supports an assure ansport supports an assure commission consumports and consumports are commission consumports and consumports are commission consumports.	we live needs to fundament dependant on both known a t, which is overly focused on all have. Moreover the heavy k that as the EV owner community congestion through road belimate friendly active and putted when considering low emissioncy; secondly - reduce the ider dividing the path for roathe key transitions. We suggespirational position of achieve	ally change in the next 15 ynd expected technology to electric vehicles, and need focus on EVs does nothing nunity becomes more main wilding (which has been problic transport modes. ssions transport is to firstly need for travel; and finally ad transport into three rath gest the new rows in prioriting fossil free road transport	o meet our obligations to be on a pathway to 1.5C. I achieve net zero by 2050 under our Te Atakura, First years with a significant behavioural and lifestyle shift. It deliver emissions reductions. This is particularly disto recognise the role that managing demand, to shift New Zealand's car-owning culture and at instream we face the same challenges we do now with roven not to work) and strong resistance to removing or - shift people from their single occupant cars into relectrify vehicles. The electrify vehicles in the following table. This port by 2030. We note that the Commission uses the role demand overall. Reducing required travel	
			distances increases the	ability for mode shift t e roll out of car share	o walking and cycling in part and ride share services as a	icular, so this is an importa mechanism to increase the	ant point to emphasise in the advice. We have also	
			Support mode shift from cars to walking, cycling and public transport	public transport Significantly increase	Budget 2 g to walking, cycling and se investment in walking, ransport infrastructure	Budget 3		
			Reduce travel demand	Prioritise compact of transport routes in	working for those who can urban form around inner city spatial planning out of car share and ride sha			
				Decarbonise road transport vehicles	Accelerate EV uptak Improve average ef		Electrify medium and heavy trucks	
				Fund zero carbon m	nass transit			
	In terms of achievability: - In the short term, it is possible to increase active modes of transport (walki services, and enable more flexible working. - Replacing cars with EVs will be achievable in the medium term as the barrie - Creating compact urban form supported by new public transport infrastruc start immediately.					the barriers to cost and ava	ailability are overcome.	

Section/topic	Question	Support/ agreement	Overall answer
			A key message that our Council would like to see in laying out that pathway for transport is 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 . 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. <u>EECA's Life Cycle Analysis</u> 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.
			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).
			Construction 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, <u>Under construction: Hidden emissions and untapped potential of buildings for New Zealand's 2050 zero carbon goal</u> , 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.
			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.
			Forestry 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.
13. Equitable and well managed transition	1 ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	Partially supportive	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.
			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."
	- ' '		Necessary Action 1a – localised transition planning 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

Section/topic	Question	Support/ agreement	Overall answer
		agreement.	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.
			Necessary Action 1b and 1c – support for small business and impacted workforces
			We strongly support these recommendations to support small business and impacted workforces through the climate transition.
			Necessary Action 1d – insulation and efficient heating 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.
			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.
			Necessary Action 1e 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.
			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 Necessary Action 1. We also think this is relevant to Necessary action 16 on behaviour change.
14. Transport	Do you support the package of recommendations and actions for the transport sector? Is there anything we should change, and why?	Partially support	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.
			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.
			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.
			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.

Section/topic	Question	Support/ agreement	Overall answer			
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				Budget 1 Budget 2	Budget 3	
			Support mode shift from cars to walking,	Encourage switching to walking, cycling and public transport		
			cycling and public transport	Significantly increase investment in walking, cycling and public transport infrastructure		
			Reduce travel	Encourage flexible working for those who can	1	
			demand	Prioritise compact urban form in spatial planni	ng	
			Decarbonise road transport vehicles	Accelerate EV uptake	Electrify medium and	
				Improve average efficiency of new ICE vehicles	heavy trucks	
				Phase out new light ICE vehicles by 2030		
				Fund zero carbon mass transit		
		- Creating compars start immediate A key message that our vehicle ownership and the least efficient mean around material consum The prioritisation of act modes can provide affor and public transport (in: Supporting mode shift to Our view is that the key There needs be more be model of 15 cities which	Council would like to see in laying out that pathwas usage regardless of whether those vehicles are in as of transporting people (in terms of energy-use/poption and resource availability. ive, shared and public transport modes aligns with redable and accessible transport for all. And there a creasing transport efficiency). from cars to walking, cycling and public transport or recommendations and actions for transport in the alance to acknowledge the role that managing demanded to the contract of the commendation of the contract of the	infrastructure is a long-term by for transport is that we continued the future all zero emission be erson-kilometres travelled; but commitment to the period of the period	cannot maintain the current levels of personal ons. They represent an inefficient use of space, are), and they are contributing to growing challenges eople of Wellington to enable a just transition. These raging active transport (improving health outcomes) on EVs as the primary means of emissions reduction. Siency and modal shift will have. For example, our recycle network can achieve emissions savings for	
			strategic cycling networ	rk). mic tools including pricing and taxes need to be ava	ailable in order to encourag	cling demand modelling on Wellington's proposed ge the shift from private vehicle use to other modes
			to address emissions bu	at also congestion. This will necessitate some legisla	ative and regulatory change	es.
			One simple regulatory t 1999/99) (as at 01 Augu schedule has not been u		lowever, the Land Transpo lies – New Zealand Legislati price inflation that has no	rt (Offences and Penalties) Regulations 1999 (SR ion sets the penalties for parking offences. This

Section/topic	Question	Support/	Overall answer
		agreement	
			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.
			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.
			Creating the scale of mode shift to active and public transport required will need a multi-pronged approach that: - provides local authorities with the level of infrastructure investment required; - supports a compact urban form; - removes regulatory barriers; - reduces public transport fares; and - empowers local authorities to put in place pricing signals to encourage modal shift.
			 We strongly support the recommendations included in Necessary action 2, however we would encourage the Commission to change this recommendation to time critical. We have the following comments: 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. 2b – The increase in central government funding 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. 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. The national farebox recovery policy should be removed and the GPS should increase funding levels for PT fare subsidies. 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
			There are also some additional actions relating to pricing and the removal of regulatory barriers that could be added to Necessary action 2, as time critical actions, that would further strengthen central government's support for an integrated national transport network: - Support the promotion of car share schemes as a convenient alternative to car ownership (Wellington Clty's two car share providers have enjoyed a significant increase in membership over the last year). - Enable the full range of economic tools, including pricing and taxes, 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. - 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 traffic resolution process 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.

Section/topic	Question	Support/	Overall answer
		agreement	 Currently, construction market capacity to deliver cycleways is constrained. An additional recommendation could be added that central and local government work with the Infrastructure Commission to build up the construction supply side 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. In addition to increasing subsidies for public transport, we note the link between this recommendation and Necessary action 16 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).
			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.
			Reducing travel demand In addition to our support of Necessary action 2e, we also note the role of Necessary action 10 – 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.
			This action should be shifted to be a part of the Transport section under "Reduce travel demand" and "Prioritise compact urban form in spatial planning". 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.
			Accelerating the uptake of light electric vehicles We strongly support the package of recommendations and actions included in Time-critical necessary action 2 and Necessary action 3. 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.
			 We strongly support <u>Time-critical necessary action 2</u>, with the following comments: 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. 2b – The package of measures to support electric vehicle availability and price is not specified, and should also cover electric bikes. 2c – No comments 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.
			 We support Necessary action 3, with the following comments: 3d – We strongly support changes to the tax system, 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. 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. Local government would also like access to additional pricing mechanisms 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.

Section/topic	Question	Support/ agreement	Overall answer
			- 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.
			The Commission should consider including a recommendation to accelerate the uptake of e-bikes (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. <u>Evidence</u> :
			 https://road.cc/content/news/e-bike-riders-quadruple-cycling-distance-finds-study-277059 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." https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7456196/ 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."
			WCC supports all of Necessary action 4. 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.
15. Energy	Do you support the package of recommendations and actions for the heat, industry and power sectors? Is there anything we should change, and why?	Partially support	Energy sources and industrial heat 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. As such, we broadly support: - Time-critical necessary action 3: Target 60% renewable energy no later than 2035 - Necessary action 5: Maximise the use of electricity as a low emissions fuel - Necessary action 6: Scale up provision of low emissions energy sources - Necessary action 7: Reduce emissions from process heat - Necessary action 8: Support innovation to reduce emissions from industrial processes
			Building energy 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 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.
			 We support Necessary action 9 with the following comments: 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

Section/topic	Question	Support/ agreement	Overall answer
			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. - 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. - 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.
			 The Commission could also consider recommending: 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. 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. 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.
			Urban Form While we strongly support the recommendations outlines in Necessary action 10, 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 "Prioritise compact urban form in spatial planning". 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.
			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.
			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 Ahlfeldt and Pietrostefani, 2019) 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.
			 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: 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; Misalignment of central government road transport planning and regional and local government mode shift planning and investment; and The interplay of Urban Development Authority legislation and achieving city-based climate outcomes.

Section/topic	Question	Support/ agreement	Overall answer
			Urban form is the responsibility of local government. National guidance on spatial planning, for example through the National Policy Statement on Urban Development, 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). 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. 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 PBC-intervention-hierarchy.pdf (nzta.govt.nz)), 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.
16. Agriculture	Do you support the package of recommendations and actions for the agriculture sector? Is there anything we should change, and why?	No view	
17. Forestry	Do you support the package of recommendations and actions for the forestry sector? Is there anything we should change, and why?	Strongly agree	We support the Commission' approach to forestry particularly as it relates to permanent native forests. 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. 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. 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. 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. 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. 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.
18. Waste	Do you support the package of recommendations and actions for the waste sector? Is there anything we should change, and why?	Partially support	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. 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

Section/topic	Question	Support/ agreement	Overall answer
			that has value. We therefore support the recommendation to measure and increase the circularity of the economy by 2025 (Necessary action 13c), 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).
			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 the preference for local communities 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.
			Our specific comments on the recommendation under Necessary action 13 include: a. 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. b. We agree that a greater proportion of waste levy revenue needs to be focused on reclinge emissions. We would also like to see revenue invested in systems and infrastructure that support local government and their communities to work at the top 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 chape. 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 emssions) and could be of high value to the community for re-use schemes. C. 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 'The Circularity Gap' is clear on the relationship between the glo
			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.
			Necessary action 14 - We strongly support the HFC recommendations

Section/topic	Question	Support/ agreement	Overall answer
19. Multisector strategy	Do you support the package of recommendations and actions to create a multisector strategy? Is there anything we should change, and why?	Partially support	Integrate Government policy making across climate change and other domains We strongly support Necessary action 15 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.
			Support behaviour change We support the premise of Necessary action 16 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.
			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.
			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.
			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 WRI paper contains valuable insights on the role of behaviour change in climate action and the role central government can play.
			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 Necessary action 1.
			Require entities with large investments to disclose climate related risks We strongly support Necessary action 17. Increased disclosures on climate relate risk help influence investment decisions and improve stakeholder understanding of their risk exposure.
			 Align investments for climate outcomes We strongly support all of the actions listed under <u>Time-critical necessary action 6</u>. 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. 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. 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. 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.

Section/topic	Question	Support/ agreement	Overall answer
			Building a Maori emissions profile We strongly support Necessary action 18 that iwi should be supported with funding and resourcing to participate and assert their rangatiratanga through emissions measurement and management.
			Driving low emissions choices through the NZ ETS We support <u>Time-critical necessary action 7.</u>
			Continued ETS improvements We support Necessary action 19. 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.
20. Rule for	Do you agree with Budget	Disagree	We disagree with Budget recommendation 5d.
measuring progress	recommendation 5? Is there anything we should change, and why?		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.
			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 contributary nature is well understood by consumers, and that the claims have environmental integrity.
21. NDCs	Do you support our assessment of the country's NDC? Do you support our NDC recommendation?	Do not support	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.
			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.
22. Form of the NDC	Do you support our recommendations on the form of the NDC?	Support	Enabling NDC recommendation 1b 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.

Section/topic	Question	Support/	Overall answer
		agreement	
23. Reporting on	Do you support our	Support	We note that there are no mechanisms currently in place, nor international agreements on how to trade carbon across national borders, making offshore
meeting the NDC	recommendations on reporting on		mitigation impossible for at least the next several years.
	and meeting the NDC? Is there		
	anything we should change, and		
	why?		
24. Biogenic	Do you support our assessment of	No view	
methane	the possible required reductions in		
	biogenic methane emissions?		

3. Committee Reports

REPORT OF THE FINANCE, AUDIT AND RISK SUBCOMMITTEE MEETING OF 10 MARCH 2021

Members: Mayor Foster, Councillor Calvert (Chair), Councillor Condie (Deputy Chair),

Councillor Pannett, Councillor Paul, Linda Rieper (External), Councillor Rush,

Roy Tiffin (External).

The Finance, Audit and Risk Subcommittee recommends:

HEALTH AND SAFETY REPORT

Recommendation/s

That the Strategy and Policy Committee:

1. Receive the information.

Website link to the Finance, Audit and Risk Subcommittee meeting agenda and Minutes: https://wellington.govt.nz/your-council/meetings/committees/finance-audit-and-risk-subcommittee/2021/03/10

Attachments

Attachment 1. Health and Safety Report 4 Page 44

Item 3.1 Page 43

Absolutely Positively Wellington City Council Me Heke Ki Pöneke

HEALTH AND SAFETY REPORT

Purpose

- This report asks the Finance, Audit and Risk Subcommittee to review the Council's health and safety performance for the period 1 July 2020 to 31 December 2020.
- The Report provides information that aligns with the Officer due diligence responsibilities under the Health and Safety at Work Act 2015 (HSWA), specifically having:
 - Knowledge of work health and safety matters
 - An understanding of the nature of operations and the hazards and associated risks
 - Appropriate resources and processes to eliminate or minimise risk
 - Appropriate resources to receive and consider information
 - Verification of the provision and use of resources and processes
 - Processes for compliance with duties or obligations under the HSWA.

Summary

- This report comprises qualitative commentary on activities that have occurred in the last six months, and are presented in three categories;
 - Risks
 - Relationships
 - Resources.
- 4. The periodic reporting (attachment 1) provides quantitative leading and lagging indicators to measure health and safety performance within Council. This style of reporting is based on the Business Leader's Health and Safety Forum: 'Monitoring what matters in Health and Safety' a guide for CEOs, which was updated in May 2019. The Council is a member of the Business Leader's Forum.

Recommendation/s

That the Finance, Audit and Risk Subcommittee:

- Receive the information.
- Recommend to the Strategy and Policy Committee to receive the information on the 18th March, 2021.

Risks

Risk Profiles

The Council's Safety, Security and Wellbeing team focusses on the Council's top nine
priority hazard/risk controls, as presented to FARS previously. The top nine risks are
shown below and defined by potential consequence and likelihood.

Item 2.4 Page 225

Me Heke Ki Põneke

FINANCE, AUDIT AND RISK SUBCOMMITTEE 10 MARCH 2021

Absolutely Positively Wellington City Council Me Heke Ki Pöneke

#	Risk
1	Personal Confrontation
2	Work at Height
3	Vehicle Traffic Mobile Equipment
4	Health and Impairment
5	Asset Failure
6	Work with or in the Vicinty of Services
7	Extreme Natural Events
8	Work Related Health Hazards
9	Ignition Sources

Specific Areas of Risk

6. The following summarises key pieces of work that have occurred in the last six months as the Council continues to manage the risks associated with specific hazard categories. This work is both good health and safety practice and assists the Council to meet our legal obligations under the Health & Safety at Work Act 2015 (HSWA) and Local Government Act 2002 (good employer).

Bowtie Risk Assessments

7. Two bowtie risk assessments have been undertaken during this reporting period; 'Ignition Sources' in October and 'Personal Confrontation' in December. Both risk profiles assessed have combinations of controls that are either fully in place and working or partially in place. Involving workers across the Council enables new ideas around how to control the risk. Where controls are partially in place it has been added to the Safety Security and Wellbeing team's annual work programme to improve the control environment and further reduce the risk.

External Health and Safety Reviews

8. A full ACC audit was undertaken in September 2020 looking at both Injury and Safety Management audit standards. The external Auditor recommended that WCC maintain tertiary level status, which is the highest level to achieve under the framework. Minor changes will be made to injury and management related processes internally.

An external review is scheduled to occur in Q1 2021 in place of the Safe Plus review. This will follow set terms of reference to review our current safety management systems and operating model. Further information will be detailed in future reporting periods.

Page 226 Item 2.4

Absolutely Positively Wellington City Council Me Heke Ki Pöneke

Health and Safety Assurance

9. The Safety, Security and Wellbeing team continue to utlise the Health and Safety Assurance Framework document aligned to the Council's Assurance Framework. The document has provided the team and organisation with an easy visual means of engaging with applicable stakeholders to understand what Health and Safety assurance activity is undertaken and provided within specific assurance areas i.e. Day to day operations, Strategic and priority Risk Categories, Culture and Other on-going assurance activities; and in relation to Assurance framework 'Lines of Defence'.

Critical Hazard Collaboration Group

10. During this reporting period the Safety Security and Wellbeing team continued facilitating Critical Hazard Collaborations. These group sessions involved key influencers internally and externally, working together to better understand and recognise opportunities to improve how we manage our top nine hazards through innovation, information sharing and process improvement. The group have met once during this reporting period to discuss 'confined spaces'.

Incident Investigations

11. In this six-month reporting period, 10 incident reports were of a high or extreme risk nature or resulted in significant harm (lost time injury). These incidents are detailed within section 5 of the Health and Safety Performance Report.

Local Government Official Information and Meetings Act 1987 (LGOIMA)

No requests were made during this reporting period.

Relationships

Construction Client Group

13. Council have continued to participate in the Construction Clients' Group forums in this reporting period, with the majority occurring virtually. This is a national forum that brings stakeholders together to deliver consistent practice for the health and safety across the construction and infrastructure industries. The forum provides WCC with an opportunity to network and have access to national and internationally recognised practices. Of particular interest to the Council is improved practice and systems in relation to Safety (and Health) in Design principles.

Critical Hazard Collaboration Group

14. This format continued during the reporting period with a session held on confined spaces. Contractors that work with the Council from across industry are specifically being invited to meetings of the Council's Critical Hazard Collaboration Group to build our relationships, provide insights from the contractor / worker perspective and to use the opportunity to improve practice for workers.

Item 2.4 Page 227

Absolutely Positively Wellington City Council Me Heke Ki Pöneke

Government Health & Safety Lead

15. The Council participates in the Government Health and Safety Lead Practitioners' Forum. The forum meets regularly during the year with a focus on specific health, safety, and wellbeing subjects of interest. A recent example is a focus on impairment. The opportunity that presents from being a participant includes strengthening our Safety, Security and Wellbeing system capability, building cross-sector relationships, raise awareness of issues and opportunities, and support sharing of proactive and joined up responses.

Resources

Annual Plan

- 16. The actions for completion in the Council's 2018/20 Safety, Security and Wellbeing Work Plan are monitored by the Council's Health and Safety Steering Group. There were several actions that had not been fully achieved during the year because of changing focus areas in supporting the organisation with COVID-19 alert levels and staff changes within the Safety Security and Wellbeing team.
- 17. Some of the key work plan achievements.
 - Final bowtie risk assessment completed for all nasty nine critical risks.
 - Security maturity review completed using the Protective Security Requirements (WCC is the first Local Government participant).
 - Completion of internal audit focused on critical risks (findings to be covered in next FARS reporting period).

External Review

 Building off external review content (section 8), the current operating model will be assessed to identify if the current model is appropriate for the business and desired health and safety performance levels in Q1 2021.

Mental Health and Wellbeing

19. Building off three key areas identified through engagement sessions in previous reporting periods, we have since undertaken work on further supporting staff including raising awareness of mental distress; training leaders and staff to support others experiencing mental distress; and, developing process transparency in relation to the Council's support mechanisms. The provision of 'Mental Health First Aid' training sessions have continued. An online training tool for Managers on 'Supporting your People' is provided through the Council's Training Portal (Whare Kura).

Elected Members Due Diligence

 The information below demonstrates Elected Members' performance against due diligence actions for the six months period 1 July 2020 - 31 December 2020.

Page 228 Item 2.4

Absolutely Positively Wellington City Council

Legislative Due Diligence Requirement

- · Acquire and keep up to date with knowledge of work health and safety matters
- · Understand nature of operations and hazards and associated risks
- Appropriate resources and processes to eliminate or minimise risks
- · Appropriate resources to receive and consider information
- Verify provision and use of resources and processes
- Have processes for compliance with duty or obligation under the HSWA 2015.

D Diff	A-1I
Due Diligence	Actual
Attend one health and safety leadership induction workshop(s)	The last H&S Leadership workshop for Elected Members on due diligence obligations was held in November 2019. This session was not fully attended.
per annum, (e.g. Business Leaders forum; 'Leading Safety' refresher; public Health & Safety Seminars)	A H&S workshop was held with the Leaders Forum in December 2020 with Elected Members around H&S Leadership. The session was fully attended by ELT members available (one leader unable to attend due to annual leave).
Participate in	Six planned observations were undertaken involving Councillors.
site/workplace safety observations with an	 29/7/2020 – Councillor Calvert
ELT Member	 27/08/2020 – Councillors Day and Paul
	 28/08/2020 – Councillor Free
	 23/10/2020 – Councillor Rush
	 4/12/2020 – Councillors Pannett, Woolf, Young, Fitzsimons
	 9/12/2020 – Councillors Foon and Pannett
	Seven planned observations were undertaken during the reporting period involving.
	 27/08/2020 - CS&G Stephen McArthur
	 28/08/2020 – CCO Claire Richardson
	 22/09/2020 – CPCO Meredith Blackler
	 23/10/2020 – CIO Tom Williams and CPO Liam Hodgetts
	 29/10/2020 – CS&G Stephen McArthur
	 4/12/2020 – CCO Claire Richardson
	 9/12/2020 – CFO Sara Hay.
Oversight and acceptance of Council wide Health and Safety Plan	The Council's 2018/20 Safety, Security and Wellbeing Plan was presented to FARS and SPC in September 2019.
Oversight of Health and Safety Climate survey findings and results	The biennial Health & Safety Climate survey was last undertaken in November 2019 and reported to HSSG (next scheduled for October 2021).
Receive and review health and safety information on Council	One Safety Security and Wellbeing report was presented to FARS and SPC for the periods: 1July 2019 to 30 June 2020 (annual report)
	, action of the company

Item 2.4 Page 229

Absolutely Positively Wellington City Council

health and safety performance through Council's health and safety reporting framework	
Have oversight of the Council's Hazard and Risk Register through annual review process	The Council has nine critical risk categories.

Attachments

Nil



Author	Gareth Jeune, Manager of Safety, Security and Wellbeing
Authoriser	Meredith Blackler, Chief People and Culture Officer

SUPPORTING INFORMATION

Engagement and Consultation

N/A

Treaty of Waitangi considerations

N/A

Financial implications

N/A

Policy and legislative implications

This information to ELT and Councillors assists them to discharge their Officer due diligence obligations under the Health and Safey at Work Act 2015. As an organisation this supports the obligations to be a good employer under the Local Government Act 2002.

Risks / legal

N/A

Climate Change impact and considerations

N/A

Communications Plan

N/A

Health and Safety Impact considered

N/A

Page 230 Item 2.4

STRATEGY AND POLICY COMMITTEE 18 MARCH 2021

Absolutely Positively **Wellington** City Council

4. Public Excluded

Recommendation

That the Strategy and Policy Committee:

1. Pursuant to the provisions of the Local Government Official Information and Meetings Act 1987, exclude the public from the following part of the proceedings of this meeting namely:

con	sidered
4.1	Public Excluded Report of the Finance, Audit and Risk Subcommittee Meeting of 10 March 2021

General subject of the

matter to be

Reasons for passing this resolution in relation to each matter

7(2)(c)(i)

The withholding of the information is necessary to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of the information would be likely to prejudice the supply of similar information or information from the same source and it is in the public interest that such information should continue to be supplied.

7(2)(c)(ii)

The withholding of the information is necessary to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of the information would be likely to damage the public interest.

7(2)(b)(ii)

The withholding of the information is necessary to protect information where the making available of the information would Ground(s) under section 48(1) for the passing of this resolution

s48(1)(a)
That the public conduct of this item would be likely to result in the disclosure of information for which good reason for withholding would exist under

Section 7.

STRATEGY AND POLICY COMMITTEE 18 MARCH 2021

Absolutely Positively **Wellington** City Council

Me Heke Ki Põneke

be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information.

7(2)(h)

The withholding of the information is necessary to enable the local authority to carry out, without prejudice or disadvantage, commercial activities.