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# DRAFT ADVICE FOR THE SECOND EMISSIONS REDUCTION PLAN

// Taituarā and Local Government New Zealand's joint submission on the  
Climate Change Commission's Draft Advice for the Second Emissions Reduction  
Plan

// June 2023



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## LGNZ

Local Government New Zealand (LGNZ) provides the vision and voice for local democracy in Aotearoa, in pursuit of the most active and inclusive local democracy in the world. We support and advocate for our member councils across New Zealand, ensuring the needs and priorities of their communities are heard at the highest levels of central government. We also promote the good governance of councils and communities, as well as providing business support, advice, and training to our members.

## Taituarā

Taituarā – Local Government Professionals Aotearoa is an incorporated society of nearly 1,000 members drawn from local government chief executives, senior managers, and council staff with significant policy or operational responsibilities. We are an apolitical organisation. Our contribution lies in our wealth of knowledge of the local government sector and of the technical, practical, and managerial implications of legislation.

Our vision is:

*Professional local government management, leading staff and enabling communities to shape their future.*

Our primary role is to help local authorities perform their roles and responsibilities as effectively and efficiently as possible. We have an interest in all aspects of the management of local authorities from the provision of advice to the planning and delivery of services, infrastructure, urban development and placemaking, community wellbeing and climate resilience and mitigation.

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## Executive Summary

We welcome the opportunity to provide feedback on the draft advice prepared by the Climate Change Commission for the second Emissions Reduction Plan (ERP). A changing climate is one of the greatest challenges facing local government and our communities, both now and in the future.

- // Local government plays significant roles across policy, planning, infrastructure and service delivery that will be critical to reduce emissions - particularly across transport, waste, forestry, agriculture, and industry. While the Commission acknowledges the role of local government, we're disappointed that the breadth and significance of this role is not fully embedded in the draft advice. To address this, we suggest that the Commission recommends that local government is directly involved in the development of the second ERP to ensure our role in delivering and supporting many of the actions is well understood.
- // The need for clearer direction and expectations for local government must be emphasised more strongly in the Commission's advice. There is little recognition in the first Emissions Reduction Plan of the role that local government can and does play to support New Zealand to meet its zero carbon goals.

## Fundamentals for Success

1. We support the recommendation to commit to specific levels of gross emissions in the second ERP to avoid the cumulative effect of delayed action. For councils to play their part in delivering to emissions targets, much greater clarity about the responsibilities for local government will be essential in this next plan.
2. The Commission may wish to consider whether it recommends the adoption of regional emissions reduction targets to support a more equitable transition. The first ERP provided little distinction between rural communities and urban areas. For example, it was unclear whether Wellington and Southland will both be expected to reduce carbon emissions or vehicle kilometres travelled at the same rate, or whether differential rates will apply to factors such as urban density and emissions from agriculture.
3. We also support clearer policy settings for the use of forestry offsets. Not all offsets are created equal, and we agree with the point raised by Te Uru Kahika that permanent native forests not only sequester carbon but can also improve our indigenous biodiversity.
4. Most councils have experience developing emissions policies, and more than 8 in 10 councils have developed emissions inventories. However, many councils currently lack the capacity, capability or funding to plan for and implement the action needed for lasting change at a city or district level. We want to see the Commission's advice highlight this gap and emphasise the need for the second ERP to allocate central government resources to support councils to reduce emissions at the local level.

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5. We agree there's a real need for clearer guidance about the existing levers and tools local government could use to avoid further development in areas at risk from climate change, or development that locks in high emissions. Councils have told us consistently that they want to see information, tools, and resources from central government that they can adapt for their communities. Useful tools that the Commission could recommend are developed to support the next ERP could include:
    - consistent tools for measuring, forecasting and reporting on emissions
    - guidance on how to set emissions reduction targets for districts/regions that are aligned with national targets
    - best practice guidance on behaviour change and communication approaches
    - calculating embedded carbon across buildings and the infrastructure asset lifecycle – from construction to use, maintenance and end-of-life
    - factoring climate change considerations into planning decisions, business cases and investment decisions, including clear guidelines for carbon assessments through procurement processes.
  6. We think the Commission's advice could be clearer about the need for the second ERP to delegate specific actions, accountabilities and methods for evaluation. The first ERP assumed many actions like congestion charging, integrated land-use planning or issuing building consents would be delivered, supported or enabled by local government without clear delegation, resourcing or processes for engagement.
  7. The draft advice also works on the assumption that the first ERP will be delivered as planned. We think that the policies in the second and third emissions reduction plans need to be stronger to meet the second and third emissions budgets given the delays in delivering to the first ERP. We suggest the Commission's advice should set out a timeline of the key policy changes that it believes are needed to deliver to the next emissions budget. Many of these policy changes are included in the body of the advice, but there's not a clear timeline to action them – which could also help councils with their upcoming planning and budgeting processes.
  8. We're glad to see the draft advice cover the challenges of unequal resourcing across iwi/hapū to contribute matauranga Māori to central and local government policy design. We support the integration of matauranga Māori into national and local climate responses and suggest that the resourcing proposed by the Commission in its fourth recommendation could be used to build capacity for iwi/hapū to understand climate change impacts, and to implement effective and equitable climate action in their rohe.
  9. We agree that the scope of the Equitable Transitions Strategy should be expanded to encompass both mitigation and adaptation efforts. Supporting community wellbeing and building resilience will be critical to ensuring those who are most vulnerable to the impacts of climate change do not bear an unfair cost in our transition to a low emissions economy.
  10. We want to see the draft advice recognise the need to educate and grow public awareness much more clearly. Many councils have found that large parts of their communities are unaware of the climate impacts they will face. While some councils have undertaken
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comprehensive co-design processes with their communities to develop climate action plans and secure buy-in, not all councils have the resources to do this.

## Creating Low Emissions Options

### Buildings

11. We suggest the recommendations around buildings are extended to include embodied and whole of life carbon emissions to incentivise action to reduce emissions. In addition to energy efficiency, this would contribute to New Zealand’s circular economy and waste objectives.

### Urban Form

12. We support Recommendation 10 that we need to “implement an integrated planning system that builds urban areas upward and mixes uses while incrementally reducing climate risk”. Councils have a crucial role in placemaking, and how we shape our towns and cities has a direct impact on transport, energy, waste, and land use emissions. The currently disjointed transport and urban development planning systems and insufficient funding and financing tools for infrastructure projects are a significant barrier to creating low emissions towns and cities.
13. The current Government has undertaken a significant reform programme which includes wholesale reform of water service delivery and the Resource Management Act. We want to see the Commission emphasise the importance of embedding climate action in the planning and regulatory tools being developed through the current reform programme to ensure a joined-up approach to developing compact urban form that supports a low carbon future.
14. We think the Commission’s guidance could go further in its recommendations about urban form. For example, incentivising green spaces and green infrastructure has the potential to play a much greater role in the development of low emissions towns and cities.

### Energy and Industry

15. It’s great to see a strong emphasis on reducing emissions from energy and industry in the Commission’s guidance. We note it will be critical that strong direction is provided in the National Planning Framework under the new Resource Management system to ensure that the National Energy Strategy is considered in the development of Regional Spatial Strategies and electrification is properly planned and provided for under the new system.

### Transport

16. We support the recommendation 16 to “Simplify planning and increase funding of integrated transport networks that optimise public and active transport. For major population centres, the Government should also complete cycleway networks by 2030 and take steps to complete rapid transport networks by 2035”. Transport presents one of our biggest

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contributors to our emissions profile and while some action has been taken to date – such as the Land Transport Management (Regulation of Public Transport) Amendment Bill – we need to put significantly more emphasis on planning and funding public and active transport.

17. Funding and resourcing will be a significant barrier to implementing public and active transport networks in the timeframes proposed. While some councils have been able to access funding through CERF and the GPS on Land Transport to deliver and optimise public and active transport networks, significant investment will be needed for Councils to ensure we can deliver on the Governments objectives and policies.
18. We'd also recommend strengthening and expanding the scope of recommendation 16 to specifically include micro mobility, mode shift campaigns, Mobility as a Service planning and rural alternatives such as mini-vans or on-demand services. Introducing public transport presents real challenges for our rural communities and isn't yet viable in most places. There needs to be flexibility for local communities to develop solutions that work for them.

## Enabling System Transformation

19. We're supportive of the need for open climate data. Data sets which are interoperable and facilitate better decision making will be critical to the work undertaken by councils and reduce inefficiencies across local government.
20. We strongly support the need for public investment to meet the emissions budgets. Funding is a key barrier at the local level as councils have restricted capacity to deliver on a number of competing central government mandates, particularly smaller councils or those with high social deprivation.
21. Central government needs to work with local government to ensure that the actions in the second ERP are adequately funded and resourced.

## Conclusion

Councils and their communities are already mitigating and adapting to the impacts of climate change and are committed to doing more. For Government to successfully deliver on its Emissions Reduction Budgets and Plans, partnership with local government is essential. The impacts of climate change and of transitioning to carbon zero are felt locally. Councils and communities need to be enabled to develop local solutions that work for their place.

Councils have a crucial role to play in delivering to New Zealand's zero carbon ambitions, but they need the support of both central government and iwi/hapū to make significant and lasting change.