

Council Briefing Agenda

Date: Thursday, 18 February, 2021

Time: 1:00 pm

Location: Council Chamber
Forum North, Rust Avenue
Whangarei

Elected Members: Her Worship the Mayor Sheryl Mai
(Chairperson)

Cr Gavin Benney
Cr Vince Cocurullo
Cr Nicholas Connop
Cr Ken Couper
Cr Tricia Cutforth
Cr Shelley Deeming
Cr Jayne Golightly
Cr Phil Halse
Cr Greg Innes
Cr Greg Martin
Cr Anna Murphy
Cr Carol Peters
Cr Simon Reid

For any queries regarding this meeting please contact
the Whangarei District Council on (09) 430-4200.

1. Apologies

2. Reports

2.1. Whangarei District Growth Strategy and NPS-UD Update 1

2.2. Climate Change Update 23

3. Closure of Meeting

2.1. Whangarei District Growth Strategy and NPS-UD Update

Meeting:	Council Briefing
Date of meeting:	18 February
Reporting officer:	Tony Horton (Manager – Strategy) Injoo Riehl (Strategic Planner) Hamish Sykes (Strategic Planner)

1 Purpose

The purpose of this briefing is to:

- Provide an update on the feedback received on the Draft Whangarei District Growth Strategy.
- Outline proposed changes made to the Draft Whangarei Growth Strategy in response to feedback received.
- Give an overview of the 24-month work programme, including our obligations under the National Policy Statement on Urban Development (NPS-UD).

2 Background

2.1 Draft Whangarei District Growth Strategy

The Draft Whangarei District Growth Strategy has been developed through two streams of work:

- A full review of Sustainable Futures 30/50 (2010 Growth Strategy)
- Compliance with the National Policy Statement on Urban Development

Elected Members have received updates on the Draft Whangarei District Growth Strategy across 2020. The briefings have covered the following:

- Scope and role of the Strategy
- Key strategic issues the Strategy has identified
- Population growth and future housing projections
- Strategic responses (including the Future Development Plan, Placemaking Programme, and the Northland to Auckland Corridor Plan)
- Upcoming changes to the new National Policy Statement on Urban Development

In September 2020, Council endorsed a second round of consultation on the Whangarei District Growth Strategy. Consultation occurred between the 7 October and 4 December. The original 5 week consultation period was extended due to the high level of interest from the public and stakeholders.

This briefing will provide an overview of the feedback received, proposed changes to the draft document and the next steps for the programme.

2.2 National Policy Statement on Urban Development

In 2016, the National Policy Statement on Urban Development Capacity (NPS-UDC) was introduced by central government. This identified Whangarei as a high growth urban area. Through this policy we were required to assess the demand for housing and business land as well as our ability to meet that demand over a 30 year time frame. This resulted in the completion of a Housing and Business Demand and Capacity Assessment in 2018. This assessment showed that we had enough capacity to meet projected demand in the short, medium and long term. The assessment informed our Urban and Services Plan Change, our Draft Whangarei District Growth Strategy and our 2021 – 2031 Long Term Plan.

In July 2020 central government release a new National Policy Statement on Urban Development (NPS-UD) . This continued the policy direction of ensuring Councils are providing enough capacity to meet demand, but also includes some key changes:

- Whangarei reclassified as a 'Tier 2 Urban Area'
- Additional requirements for a Housing and Business Demand and Capacity Assessment and a Future Development Strategy
- Policy direction on quality urban environments and car parking minimums
- Greater emphasis on collaboration and partnership with other councils, agencies and hapu

This briefing will give an overview of the NPS-UD requirements and our planned programme of works for the next 12 months.

3 Discussion

3.1 Consultation on the Draft Whangarei District Growth Strategy

In September 2020, Council approved a second round of consultation. The consultation approach adopted included:

- Community wide engagement through online and hard copy surveys, weekly drop-in sessions, Council news and other social media outlets.
- Targeted workshops and discussions with key organisational and agencies.
- Hui with our hapu partners.

The consultation process was undertaken from 7 October 2020 to the 4 December 2020.

Summary of Feedback Received

The second round of consultation provided Council another opportunity to receive feedback on the key strategic issues in Whangarei from Central/Local Government, hapu and other key stakeholders. The discussions had with those stakeholders were targeted to ensure:

- The Growth Strategy is aligned with the direction of both Central Government work programmes and other local programmes
- All strategic issues across Whangarei had been identified
- Understanding whether Council are acting accordingly to advocate for future opportunities for the District
- To identify any other gaps within the Strategy

The feedback received was generally positive in regard to the need for a strategic document to manage long term growth and development. There was also support for the process of engagement, the communication tools used and the look and feel of the strategy document.

Feedback identified key issues and concerns for our community, these included:

- The rate of growth and development in the District

- Housing needs and affordability
- The ability for infrastructure to keep up with growth and levels of service
- The impact of development on our natural environment and effects of a changing climate
- Greater priority and acknowledgment of our hapu partners

A more detailed overview of the consultation and feedback received can be found in Attachment 1.

Proposed Changes to the Whangarei District Growth Strategy

In response to the feedback received a number of changes to the Draft Growth Strategy are proposed:

- Greater emphasis on issues facing our rural and coastal communities, including managing growth, provision of the services and facilities. This will involve addition content in the strategic issues section as well as the actions
- Introduction of a dedicated tangata whenua content to the document as well as integrating the strategic responses and actions. This will be guided by feedback received from:
 - 19 October hapu workshop
 - Two planned hui on 12 and 20 February
 - Te Huinga monthly hui from March 2020 onwards
 - Hapu report for Sustainable Futures 30/50
- Reframing the narrative for the future of our economy section to take into account discussions with stakeholders on economic opportunity as well as an update on COVID-19 recovery.
- Alignment with Central Government actions and programmes. In particular in response to discussions with Waka Kotahi/NZTA, Kainga Ora and Ministry of Housing and Urban Development. This includes:
 - New transport policy direction and priorities
 - Housing programmes
 - Large projects such as State Highway 1 improvements
- Updating the strategy with new information and data from the groups and agencies we have engaged with.

3.2 Overview of NPS-UD requirements

The NPS-UD is a policy statement produced by central government. It recognises the national significance of

- having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future
- providing sufficient development capacity to meet the different needs of people and communities.

The NPS-UD sets out objectives and policies that direct councils in their approach to managing growth and urban environments. The requirements include both reporting as well as setting policy direction in strategies and RMA documents.

An overview of the NPS-UD can be found in Attachment 2.

We are well placed to respond to the NPS-UD because of the work completed for the previous 2016 National Policy Statement on Urban Development Capacity, including our 2018 Housing and Business Land Capacity Assessment, District Plan and Growth Strategy.

A key driver for the NPS-UD requirements is on building strategic partnerships between Council and government agencies and with local iwi and hapu. Through our the work on the Growth Strategy and Placemaking we have begun to foster strong relationships which will be of benefit to this programme of work.

A table of the key requirements for Whangarei District Council are outlined below:

Requirement	Key implications	Timeframes
Housing and Business Land Capacity Assessments (HBA)	<p>Identify the demand for housing and business land in short, medium and long term. Establish whether there is sufficient capacity to meet demand.</p> <p>If there is a shortfall in capacity, we will need to:</p> <ul style="list-style-type: none"> • immediately notify the Minister for the Environment • and if the insufficiency is wholly or partly a result of RMA planning documents, change those documents to increase development capacity for housing or business land (as applicable) as soon as practicable, and update any other relevant plan or strategy • and consider other options for increasing development capacity and enabling development 	<p>Complete by July 2021</p> <p>Note – this will be a review and update of the 2018 HBA.</p>
Future Development Strategy	<p>Sets out where future housing and business land will be developed and the timing and process of enabling development. This is informed by the HBA</p> <p>Needs to follow a special consultative process through the LGA</p> <p>Needs to be in place to inform the 2024 Long Term Plan (including AMPs / Infrastructure Strategy / Finance Strategy)</p>	<p>In time to inform the 2024 – 2034 Long Term Plan</p> <p>This will build on the Future Development Plan in the Draft Whangarei District Growth Strategy and the work progress through the Placemaking Programme</p>
Monitoring Reports	<p>Monitoring reports on key housing indicators as set out in the NPS-UD. This includes house prices, building consents, subdivisions.</p>	<p>Monitored quarterly and reported annually.</p> <p>Monitoring and reporting framework already outlined in the Draft Whangarei</p>

		District Growth Strategy. First report has been provided to Council in August 2020.
Removal of car parking minimums from District Plans	Removal of car parking minimums from the District Plan. Does not need to follow a Schedule 1 RMA process.	By January 2022
Housing bottom lines	Introduce with the Regional Policy Statement and the District Plan the amount of housing required to meet project demand. This is based on the HBA Does not need to follow a Schedule 1 RMA process	As soon as practicable after the completion of the HBA.
Density and building height	Introduce policy and provisions within the District Plan and Regional Plan to enable densities and building heights that align with the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services or relative demand for housing and business use in that location.	By July 2022 Urban and Services Plan Change largely addresses this the District Plan – although further refinement may be required following the HBA process.

3.3 24 Month programme

In order to finalise and implement the Whangarei District Growth Strategy and meet our obligations under the NPS-UD, both programmes need to align. We are well placed to do this because the actions of the Draft Whangarei District Growth Strategy incorporates the NPS-UD requirements. The programme set out below will meet our legislative objectives and can be implemented through existing and planned operational budgets over the next 2 years.

However, it will mean there is limited capacity to undertake new work beyond the strategic programmes we have committed to, which includes:

- Placemaking Programme
- City Centre Planning
- Bylaw and statutory policy reviews
- Climate change (subject to additional funding through the LTP)
- Corporate planning (Annual Plan, LTP and non-financial components of the Annual Report)

The programme below is based on the Housing and Business Land Capacity Assessment showing that there is not a shortfall in capacity. If a shortfall is identified, additional tasks will be needed, including possible District Plan changes. It is also noted that reforms of the RMA may also impact or influence this programme of work.

Action	Timeframes
Growth Strategy hui and stakeholder meetings Hui with our hapu partners on the Draft Growth Strategy and NPS-UD:	February 2021

<ul style="list-style-type: none"> 12 February 2021, Tau Henare Marae, Pipiwai 20 February 2021, Maungarongo Marae, Poroti <p>Further stakeholder meetings in February with Waka Kotahi/NZTA, Ministry for Housing and Urban Development and Kainga Ora.</p>	
<p>Draft Whangarei District Growth Strategy</p> <p>Revised draft presented to Council at a briefing for further feedback and comments.</p>	March 2021
<p>Adoption of Whangarei District Growth Strategy</p> <p>If there is comfort to proceed, adoption of the Whangarei District Growth Strategy.</p>	April 2021
<p>Initial findings from HBA</p> <p>Provisional findings from the Housing and Business Land Demand and Capacity Assessment.</p>	May 2021
<p>Final HBA and housing bottom lines</p> <p>Final report and analysis of the Housing and Business Land Demand and Capacity Assessment.</p> <p>Housing Monitoring Report</p> <p>Update of the monitoring report received by Council in August 2020.</p>	July 2021
<p>Future Development Strategy</p> <p>Start development of the Future Development Strategy including defining scope, stakeholders and process.</p>	November 2021
<p>Formal consultation of the Future Development Strategy</p> <p>Special Consultative Process under LGA for Draft Future Development Strategy.</p>	July 2022
<p>Adoption of the Future Development Strategy</p> <p>Adoption of the Future Development Strategy to allow integration in to the planning process for the 2024 – 34 Long Term Plan.</p>	December 2022

3.4 Other relevant programmes

Alongside the work programme there are two other key programmes of work. However, they are both in infancy, so we do not yet have a clear picture of the timeframes or deliverables.

Northland to Auckland Corridor Plan

This project is driven through the central government Urban Growth Partnerships programme, which has delivered regional/inter-regional plans such as the Hamilton to Auckland Corridor Plan. The plans are developed in collaboration across government agencies, councils and iwi/hapu.

Council have previously be briefed on this opportunity and it is a key action within our Draft Growth Strategy. However, due to COVID-19 and the central government elections, this project has been delayed.

Staff will be meeting with representatives from the Ministry of Housing and Urban Development to discuss the plan, its scope and the proposed process and timeframes

Te Tai Tokerau Housing Group

The group is chaired by the Ministry of Social Development and includes representatives from Kainga Ora, Te Puna Kōkōri, Ministry of Housing and Social Development as well as Councils. Its primary focus is public housing delivery and co-ordination of housing related work programmes and investment.

The first meetings were held late 2020. The terms of reference for the group are still in development. Further updates will be presented to Council when the terms of reference are finalised and work programme is developed.

4 Attachments

1. Summary of Feedback Report
2. Summary of the National Policy Statement on Urban Development

Update Report

Sustainable Future: Draft Whangarei District Growth Strategy

December 2020

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Executive Summary

This report summarises the feedback received on the Draft Whangarei District Growth Strategy. The Strategy provides a 30 year outlook on how Council can manage future growth and address the issues that matter to our community. The Growth Strategy will be reviewed every three years and include regular monitoring and reporting to support integrated Council decision making. The Growth Strategy has been developed in response to two key drivers:

- The need to review our existing growth strategy (Sustainable Futures 30/50), which is 10 years old.
- Responding to the requirements and policy direction of the National Policy Statement on Urban Development.

A first draft of the Growth Strategy was prepared in 2019 and was subject to public consultation. Since then a lot has changed. We have new Central Government policy direction, along with updated information on our demographics and the impacts from COVID-19. In response, we developed a second version of the Growth Strategy in 2020, which was subject to consultation from 7 October to 4 December.

The approach taken to the consultation involved:

- Community wide engagement through online and hard copy surveys.
- Targeted stakeholder discussions with key organisations and agencies.
- Hui with our hapū partners.

The feedback received was generally positive in regard to the need for a strategic document to manage long term growth and development. There was also support for the process of engagement, the communication tools used and the look and feel of the strategy document.

Feedback also identified key issues and concerns for our community, these included:

- The rate of growth and development in the District
- Housing needs and affordability
- The ability for infrastructure to keep up with growth and levels of service
- The impact of development on our natural environment and effects of a changing climate
- Greater priority and acknowledgment of our hapū partners

The feedback has identified further work we need to do, including:

- Greater emphasis on issues facing our rural and coastal communities
- Introduction of a dedicated mana whenua / tangata whenua content to the document as well as integrating the strategic responses and actions
- Reframing the narrative for the future of our economy and the key Central Government actions and projects.
- Updating the strategy with new information and data from the groups and agencies we have engaged with.

Purpose

This report is intended to update Elected Members on the Growth Strategy projects underway. In particular:

1. Update elected members on the Growth Strategy consultation.
2. Update elected members on possible amendments to the Growth Strategy and the high-level work programme for 2021.

The Story of the Whangarei District Growth Strategy

Since the adoption of the Whangārei District Growth Strategy Sustainable Futures 30/50 in 2010, there have been a lot of changes in our District. Some of these changes we anticipated such as our growing population, but others were difficult to predict, such as COVID-19.

To ensure the Growth Strategy remains relevant we have undertaken a full review of Sustainable Futures 30/50 and its implementation plan. We have also used this review to ensure we are complying with the requirements of the National Policy Statement on Urban Development (NPS-UD). The NPS-UD requires us to establish the housing need for our community, whether we have enough capacity to meet that need and where in the future new development will go. We also need to be continually monitoring development within our district and using that information to inform our decision making.

We consulted on a first draft of the new Growth Strategy in 2019. The feedback from the community was broadly supportive of continuing the direction set by Sustainable Futures 30 / 50. However, changes made in response to community feedback included:

- Removing future growth opportunities in the Whangarei Heads area.
- Greater emphasis on housing as a critical issue for the district.
- Identification of the port and potential expansion as key economic driver.

In preparation of the second draft of the Growth Strategy we have had to address some new issues and policy areas such as:

- Recovery and reset from COVID-19.
- Updated data and information on how our District is changing.
- Our obligations under new National Policy Statements.
- Analysis of housing and business demand.
- Updated information on climate change risk.
- Protection of our productive land and key natural features.
- Alignment with Central Government programmes and funding.

Following a series of briefings with Council over 2020, endorsement was given in the September Council Meeting to proceed with public consultation.

Our Consultation Approach

The approach taken to the consultation involved:

- Community wide engagement through online and hard copy surveys, weekly drop-in sessions, Council news and social media.
- Targeted workshops and discussions with key organisations and agencies.

- Hui with our hapū partners.

The consultation was undertaken from 7 October 2020 to 4 December 2020.

Central/Local Government Workshops

The priority for the workshop with government agencies at local and national level was to:

- Seek alignment between the Growth Strategy and government policy.
- Recognise cross-boundary/common issues between local government agencies in Northland.
- Identify opportunities for central government to support and partner in programmes or actions that will address the key issues facing Whangarei into the future.

The feedback towards the Draft Growth Strategy was positive and there is consensus that the Strategy is targeting the right strategic drivers.

It was emphasised from all parties that it is essential we are all working towards better forms of collaboration, particularly as Central Government are pushing forward with their reforms and there is potential for infrastructure investment in the Northland Region. Key planning projects such as the Northland to Auckland Corridor Plan (which has been identified in the Draft Growth Strategy) will be pivotal for those working relationships to progress.

Feedback received identified that there was a need from Central Government to better understand the nature of future growth within the District. In particular, where the growth hotspots will be and how they can use this information to be target infrastructure investment and policy making.

Similarly, at a local government level there was an acknowledgement that high rates of growth and development are being experienced across the Far North, Kaipara and Whangarei. In response, all Northland Territorial Authorities are undertaking some form of spatial or strategic planning. Therefore, there are many opportunities to better collaborate and leverage of this work.

A number of matters were raised which need to be considered in more detail, this includes greater alignment with central government transport policy, identification of key commercial centres and clear statements on how we comply with the NPS-UD

Government agencies we engaged with:

- Waka Kotahi/NZTA
- Kainga Ora
- Ministry for the Environment
- Ministry of Education
- Ministry for Social Development
- Te Puna Kōkiri
- Northland Transport Alliance
- Northland Regional Council
- Kaipara District Council
- Far North District Council
- Auckland Council

Consultation with hapū

One of our priorities for our consultation was to engage in a meaningful way with our hapū partners.

Early discussions 2020 with Te Huinga led to a regular timeslot at their monthly hui to discuss and progress the Draft Growth Strategy. A hapū workshop was held at the Central Library on 18 October. The discussions highlighted number of strategic themes to be considered in the Draft Growth Strategy, such as the importance of our rural and coastal communities as well as better acknowledgment of mana whenua and tangata whenua.

Three additional hui are planned for February and March to enable further engagement on the Growth Strategy, as well as confirming comfort with our hapū partners on the final direction for the document.

Key Stakeholders

WDC directly contacted a range of stakeholders to encourage them to provide feedback and/or attend a workshops. Stakeholders included:

- Local businesses
- People and groups that provided feedback on the 2019 Growth Strategy
- Key agencies and organisations

There were groups who Council reached out to who decided not to submit on the Strategy. The stakeholders who provided a submission and/or attended a workshop included:

- Northland District Health Board
- NorthPort
- Commercial Centres Ltd
- Southpark Ltd
- Northland Inc / Chamber of Commerce
- Fonterra Ltd
- Ruakaka Economic Development Group
- Golden Bay Cement
- Community Housing Providers
- Community Networkers Forum
- Council Advisory Groups

The feedback received on the Draft Growth Strategy were generally positive on the direction of the Strategy. However, a number of issues were raised that we will need to review in more detail, this includes:

- Better recognition of economic opportunities and diversification.
- Identification of council tools which can support new businesses.
- Council to place a greater focus on advocating to Central Government on issues such as housing.
- Include reference to hierarchy of commercial centres.

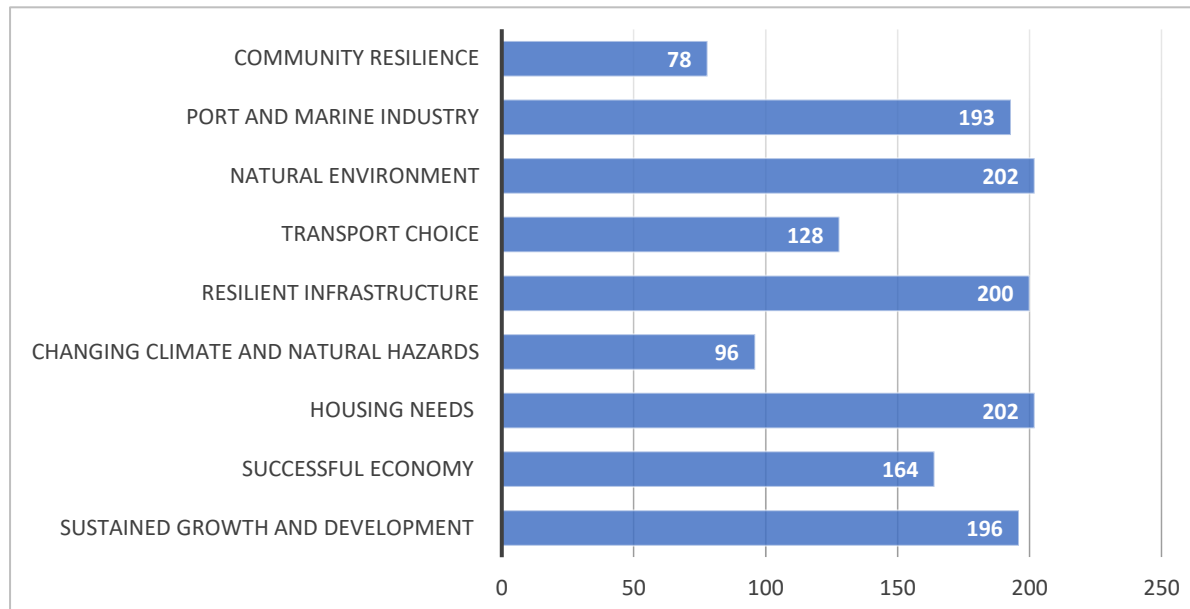
Survey and Social Media feedback

The survey was directed towards some of the key issues identified within the Growth Strategy including housing, transport and climate change. It also provided the public with another opportunity to provide further commentary on matters that may have not been identified in the Growth Strategy.

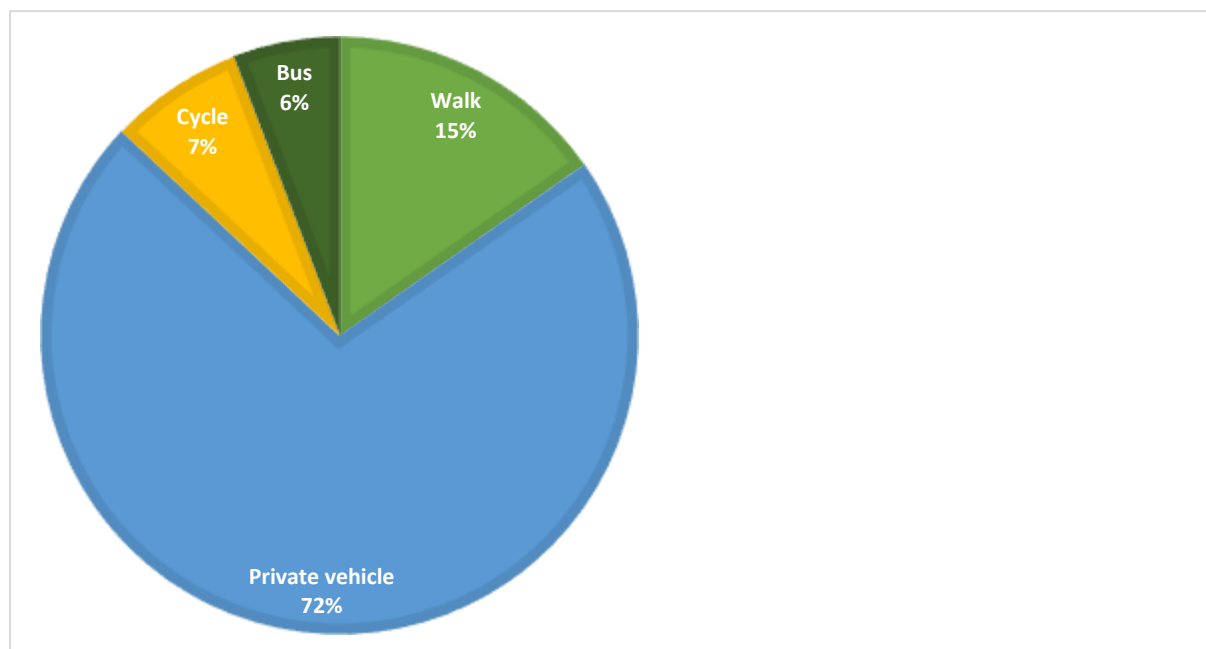
Online Survey Results

The questions were identified to address key sections of the Growth Strategy as well as to build on information we gain from the last Growth Strategy consultation in 2019. The survey was completed by 488 participants.

Question One: The new Growth Strategy outlines the following 9 key strategic drivers. What strategic drivers are of most interest to you?



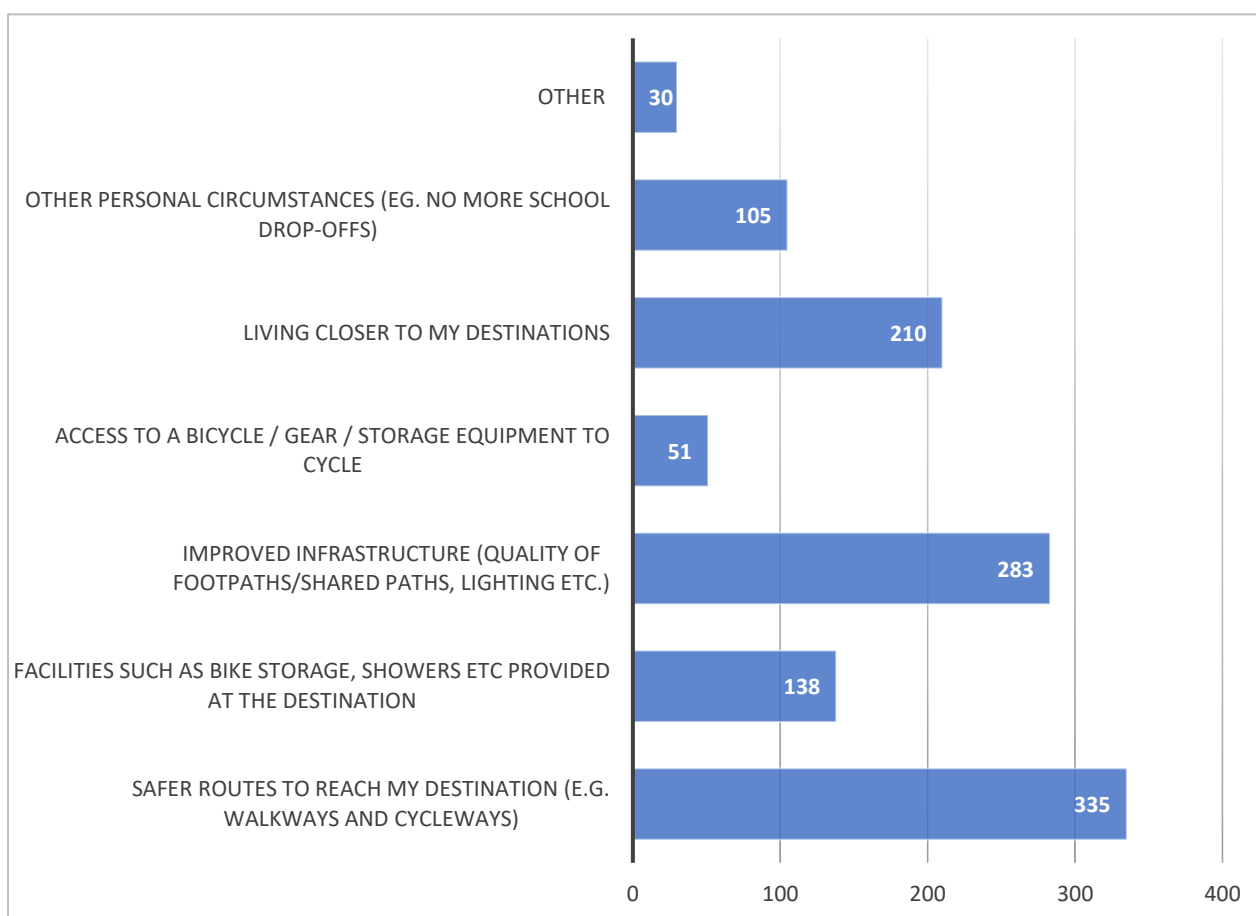
Question Two: What are your main modes of transport for getting between home, work, education, services?



Question Three: In an ideal world, which modes of transport would you like to use the most/the least? Rank the options below (1 for using the most, 4 for using the least).

	1 Most	2	3	4 Least
Walk	123	152	115	81
Cycle	91	133	130	117
Bus	48	118	127	178
Private vehicle	209	68	99	95

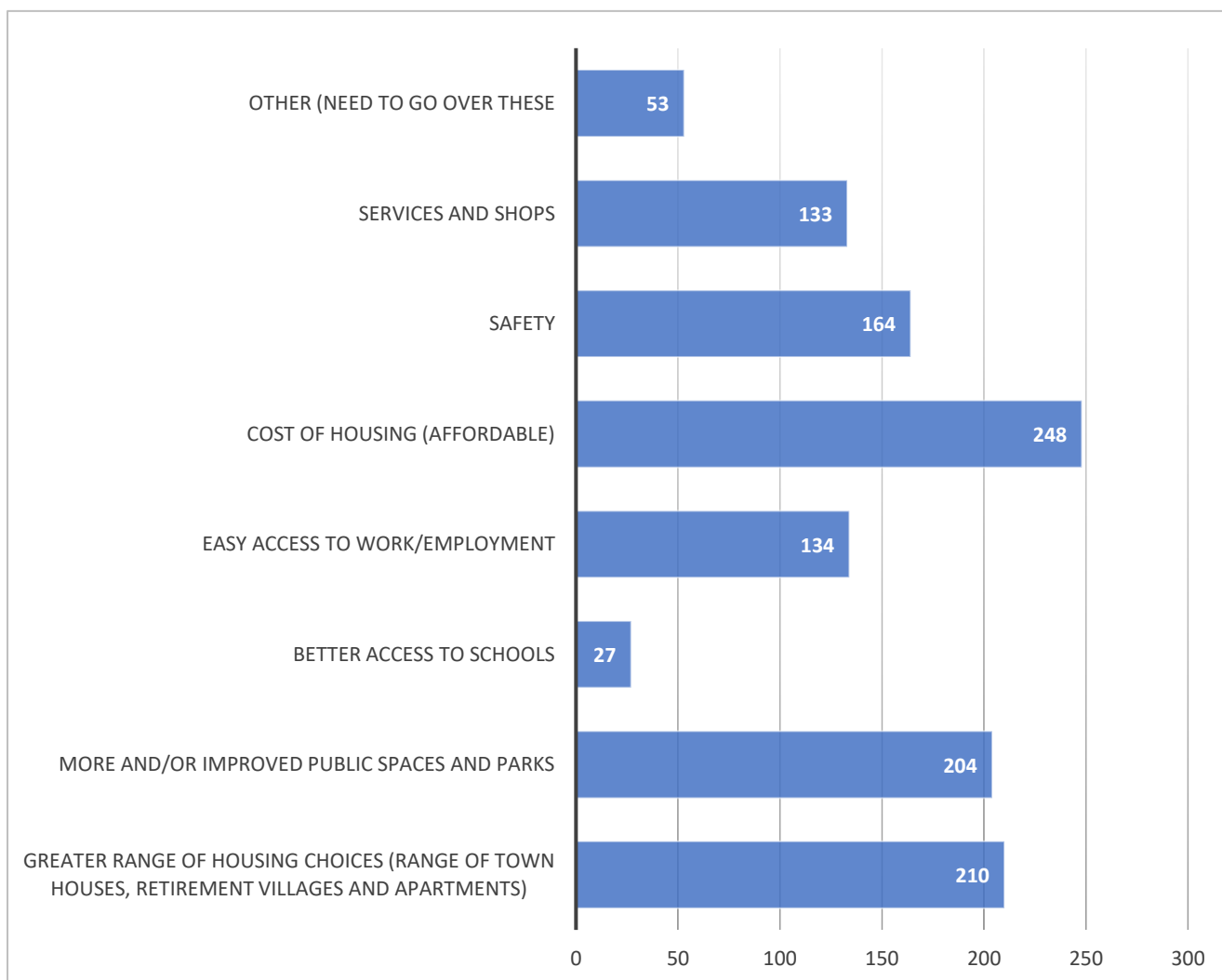
Question Four: What do you think would make you more likely to walk or cycle more to reach work, education, and services? (Select top 3).



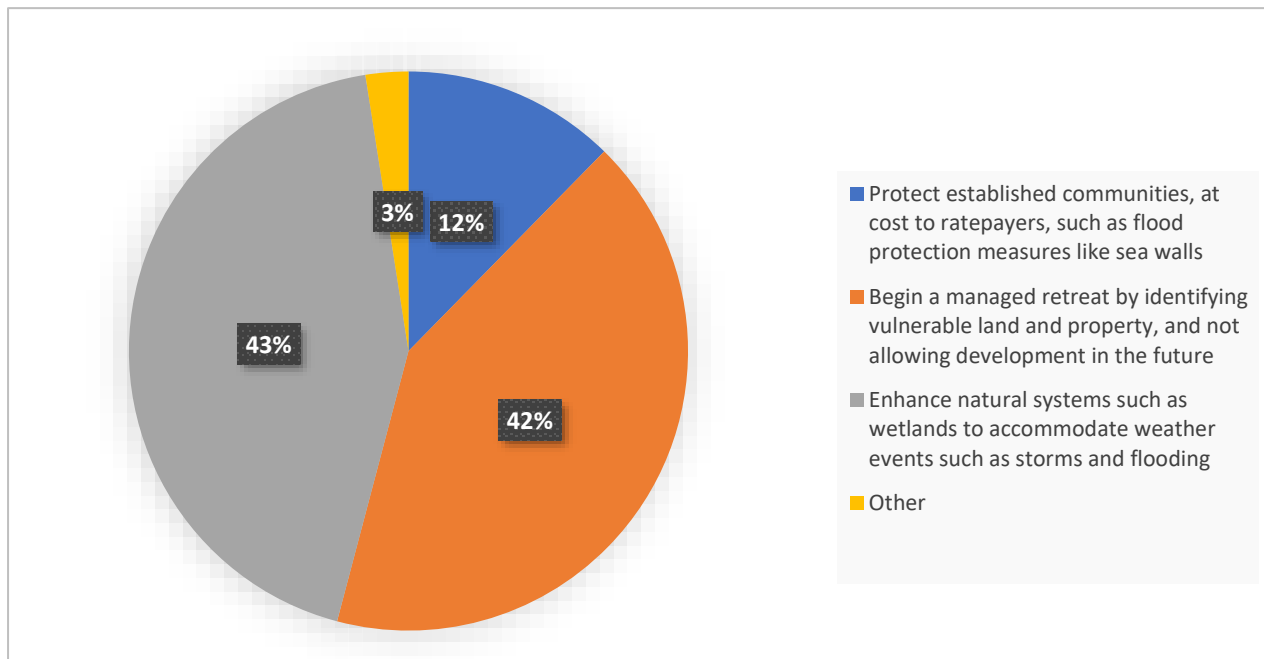
Question Five: If we think about future housing growth for the District, what issues are the most important to you? Rank up to 4 (1 for most important, 4 for least important)

	1 Most Important	2	3	4 Least important
Affordability	214	111	93	59
Housing choice	58	84	135	200
Healthy homes	119	192	103	63
Right housing types in the right location	86	90	146	155

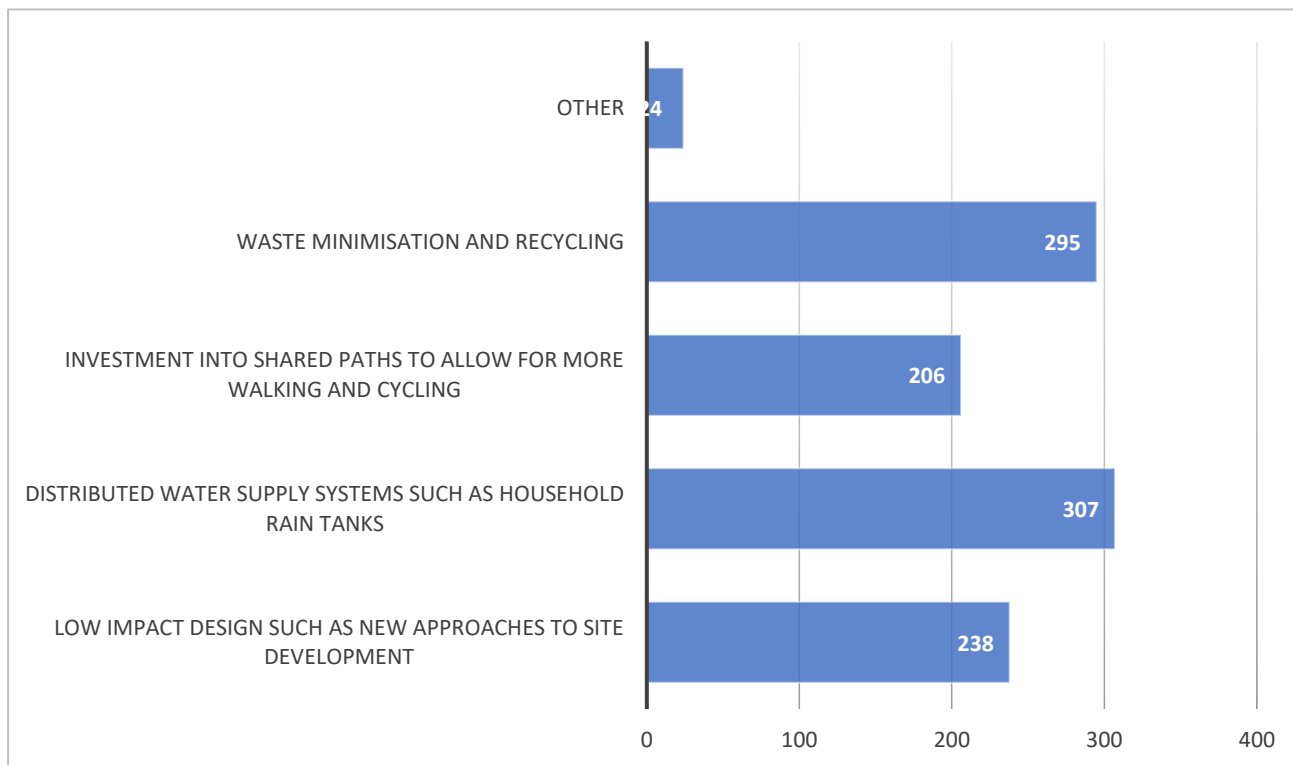
Question Six: What would make it more desirable for you to live closer to or in the City Centre?



Question Seven: Our District is vulnerable to a changing climate and more frequent storm events. In communities that are vulnerable to the impacts of climate change, which of the following approaches, methods should Council prioritise?



Question Eight: Our natural environment will continue to be impacted as population grows. What approaches are you supportive of to mitigate the impacts on our environment?



Key Changes from the feedback received

Feedback received from the community, stakeholders and our hapu partners has identified a number of areas of the Growth Strategy that could be changed. These potential changes will be worked through with Councillors at the briefing on 16 February 2021:

Mana Whenua / Tangata Whenua

Introducing a new Mana Whenua / Tangata Whenua content into the Growth Strategy was one of the recommendations made by hapu through the October Hui. The content will help build on Council's understanding to further incorporate Te Ao Maori into Council's future strategy and policy direction. The chapter will require the assistance of our hapu partners to provide the expert knowledge and build a complete picture. These discussions will proceed early next year.

Rural Communities

One of the messages that has been received from both our meetings with Te Huinga and our hapu workshop is the need for the Draft Growth Strategy to better address the key issues for our rural communities. While the Strategy is driven by the new National Policy Statement on Urban Development, there is a need for greater clarity on our investment and levels of service for our rural communities.

Successful Economy

Changes are proposed to better align with our response to COVID-19 and recognising future opportunities such as those outlined in Te Tai Tokerau Economic Plan. Comments from key stakeholders such as NorthPort and Golden Bay Cement, as well as input from our District Development Manager, has identified a need to amend the strategy to better reflect issues such as diversification, importance of infrastructure investment and job creation.

Key Infrastructure Projects.

There are number of key infrastructure projects and programmes for the Whangarei District which are funded and delivered by agencies other than Council. These projects will support the future development of the District. Additional content is proposed to acknowledge these projects and identify opportunities to maximise the best outcomes for our community. Some of the key projects which will be identified include:

- Port expansions
- Drydock facility
- Navy Base / Defence Force Hubs
- State Highway investment
- Rail Investment
- New Health Infrastructure.

Housing

Similar to the changes made to the Economy section, additional commentary in the Housing section is proposed to:

- Better define the role of Council, Central Government and Community based providers
- Update data on housing – including affordability and over crowding
- Acknowledge new housing trends and technologies that could influence how new homes are delivered.

City Centre

The strategy will be updated to reflect progress made on inner city living. Additional content is proposed to align better with recent developments in the City Centre including the works starting on the New Town Basin Park and Council consideration of Complete Streets Masterplan projects in the 2021-31 Long Term Plan.

Our Work Programme for 2021

Hui/Workshop for the Whangarei District Growth Strategy

WDC at the beginning of 2021 will be workshopping with our hapu partners on the Draft Growth Strategy. This is an opportunity that will add further direction on some of the key issues the Draft Growth Strategy is looking to address. It is also a chance for Council to better connect with those who do associate with rural communities across Whangarei. The proposed dates of the three hui are:

- 12 February 2021, Tau Henare Marae, Pitiwai
- 20 February 2021, Maungarongo Marae, Poroti
- 12 March 2021, Whangarei Teranga Paraoa Marae, Whangarei

National Policy Statement Requirements

Under our legislative requirements for the new National Policy Statement on Urban Development, WDC will need to complete a full housing demand and capacity assessment. This will need to be completed by July 2021.

This assessment will inform the next requirement which is the Future Development Strategy, that sets out in detail the location, timing and form of future housing and business development in the District.

Monitoring and reporting

In order to comply with NPS-UD requirements and to help inform decision making, we will continue to monitor trends in housing and growth across the District. These will be presented to Council in Monitoring reports similar to those received by Council as part of the Strategic Session on Housing in July 2020. Monthly operational reports will continue to provide information on Building Consents and Resource Consents.

Improving how our cities respond to growth to enable improved housing affordability and community wellbeing

What is the National Policy Statement on Urban Development (NPS-UD)?

National direction that sets out objectives and policies for urban development under the Resource Management Act 1991. Councils must give effect to these objectives and policies.

Why do we need an NPS-UD?

Constraints in the planning system have made it harder for people to build and live in the homes they want, where they want. This has led to high land prices, unaffordable housing, and a system that incentivises land banking and speculation. It has also resulted in people having poor access to employment, education and social services. This impacts most on our poor, vulnerable and younger generations.

Where does it apply?

Some policies apply only to "Tier 1" local authorities in Auckland, Christchurch, Wellington, Tauranga and Hamilton. These include the most directive policies, particularly regarding intensification.

Others apply to both Tier 1 and Tier 2 (Napier-Hastings, Nelson, Whangarei, Palmerston North, New Plymouth, Rotorua, Dunedin, Queenstown).

The majority of policies, including carparking, apply to all urban environments that have, or are planned to have, more than 10,000 inhabitants.

Buildings in the city centre are taller and denser, giving more businesses and apartment dwellers a chance to work and live there, where productivity is highest.

Buildings within a walkable range from city centres, metropolitan centres and existing or planned rapid transit stops may now be six storeys, or higher.

The form of the city and the types of homes within it enables all people and communities to provide for their wellbeing, provides access to opportunity to all and evolves to reflect the diverse and changing needs of its inhabitants. This includes allowing Māori to express their cultural traditions and norms.

Across the city, height and density reflect demand and the level of accessibility by active and public transport.

More people live in areas with good public and active transport links, meaning they are not reliant on cars for transport. This will help to reduce traffic and transport emissions.

Developers are free to determine the number of carparks in their developments. This means people who do not need or want car parks at their home or business premise are not required to pay for them.

This is because councils need to be responsive to development that will provide significant numbers of new homes or business locations, and will contribute to good outcomes.

In some areas, plans may not enable the same levels of intensification. For example, areas with significant risks of natural hazards, or heritage buildings, or exemptions will require an evidentiary basis, and are unlikely to take the form of a blanket ban on development.

Major policies in the NPS-UD

Intensification

Council plans will need to enable (but not require) greater height and density, particularly in areas of high demand and access.

Car parking

Councils will no longer be able to require developers to provide car parking through their district and city plans. However, developers can still provide car parking if they wish. Mobility parking is not affected by this direction.

Responsiveness

Councils must consider private plan changes where they would add significantly to development capacity, good outcomes and are well connected by transport corridors

Wider outcomes

Councils are directed to give greater consideration to ensuring that cities work for all people and communities. Particular focus is given to access, climate change and housing affordability.

Strategic planning

Councils are required to work together produce "Future Development Strategies", which set out the long-term strategic vision for accommodating urban growth.

Evidence and engagement

Councils must use a strong evidence base for their decision making and ensure they engage with Māori, developers and infrastructure providers.

2.2. Climate Change Update

Meeting: Whangarei District Council Briefing
Date of meeting: 18 February 2021
Reporting officers: Bernadette Aperahama (Senior Strategic Planner)
 Hamish Sykes, (Strategic Planner)

1 Purpose

To update Elected Members on the Climate Change Adaptation and Mitigation projects underway. In particular:

1. Climate Adaptation Taitokerau (CATT) project;
2. Progress on the draft Climate Action Plan for Whangarei;
3. Review of the implementation of the Corporate Sustainability Strategy;
4. Draft submission from the Northland councils on the Climate Change Commission's advice to Central Government on the Emissions Reduction Plan and the Emissions Budget.

2 Discussion

2.1 Climate Adaptation Taitokerau (CATT)

Climate Adaptation Te Taitokerau (CATT) is a joint working group made up of council staff from all four Northland councils – Kaipara, Whangarei and Far North District Councils and Northland Regional Council. A key objective for the group was to align climate adaptation policy, information and methodologies, and pursue collaborative opportunities to enable effective regional adaptation planning. The work is intended to produce a strategy framed around understanding:

- What is happening?
- What matters most?
- What can we do about it?
- How can we implement the strategy?

Joint Climate Change Adaptation Standing Committee

The first meeting of the committee is set for Monday 12th April 2021.

Coastal Hazard Mapping

Northland Regional Council staff delivered a workshop for Elected Members on the NRC's updated Coastal Hazard maps on 16 February.

Te Ao Maori Framework & Mātauranga Māori and GIS Data Capture

As discussed in earlier reports for Climate Change and Te Karearea, our hapū and iwi representatives across the region have emphasised the need for councils to develop a Te Ao Māori framework that builds an understanding of cultural differences into council processes relating to climate change such as policy, planning and resourcing decisions. Such a framework is necessary to underpin the Adaptation strategy. Given the issue's

importance, the development of a Te Ao Māori framework for all Northland councils will be developed in a parallel process. The framework has also been included in the following areas:

- As a priority action in the Climate Action Plan for Whangarei District Council;
- Within the Terms of reference for Te Karearea;
- 3 Waters work.

Funding of \$100,000 to develop the framework was approved through the 3 Waters Fund.

We also heard that understanding and drawing on Mātauranga Māori will be critical for a greater understanding of the risks, and for future planning. From our hapū and iwi representatives we have heard of the need for tools to enable marae, hapū, iwi to undertake their own risk assessments based on Te Ao Maori. This aspiration is acknowledged in the National Climate Change Risk Assessment.

Similarly to the Te Ao Maori framework, a Mātauranga Māori and GIS Data Capture project to improve the data base of places and assets of value to Maori was pitched as being of regional relevance and addressing several projects: Climate Change Adaptation Taitokerau and Climate Action Plan. Funding of \$150,000 was approved through the 3 Waters Fund.

Project Management support is being arranged for the development and delivery of these two components of our climate change work.

2.2 Climate Action Plan (CAP)

WDC have committed to developing a Climate Action Plan in response to the declaration of a climate emergency. It builds on the internally facing Corporate Sustainability Strategy that was adopted in 2018. The Climate Action Plan has outcomes focused on climate change mitigation and adaptation. The update report to Elected Members in December 2020 provided a detailed summary of where how the Climate Action Plan is progressing.

Engagement in early 2021

We are running additional joint workshops covering the Growth Strategy and Climate Action Plan with hapū. These workshops address complementary projects and enable whanaungatanga, relationship building between staff and hapū including District Plan staff (when they are available) who will be undertaking plan changes in 2021. The first hui for the year was held on Friday 12th February 2021 at Tau Henare Marae, Pipiwai. Feedback from hapū included:

- A strong interest on locally based low emission infrastructure solutions to build their resilience and reduce environmental impact;
- Direction to Council to respond quicker – climate change is an emergency we need to respond to with urgency;
- Council should be leading by example in our areas of operation.

We have had some changes to our engagement schedule. Maungarongo Marae, Poroti is no longer available for our second hui this Saturday so we are working with hapū to find another suitable date and location. The workshop planned for 12 March 2021 at Whangarei Terenga Paraoa Marae, Whangarei will be now be for the purposes of Long Term Plan engagement.





Other Engagement Opportunities

- Climate change and sustainability network
- Additional meetings with the farming community including Extension 350
- Building sector quarterly meeting;
- Green Drinks monthly meeting – tentatively booked for 30th March 2021
- Northland Chamber of Commerce
- Tutukaka Community – end of Feb 2021. Date not set yet.

Guidance from the organisers of the Community Networkers monthly meeting is that the Climate Action Plan requires its own focussed meeting.

If there are community groups within the District who you think would like the opportunity to listen and partake in a CAP workshop early next year, please let us know. Formal consultation on the CAP will begin on March 2021 as part of the LTP engagement.

Project Timeline

	Targeted Engagement: Underway now – end of March 2021
	Review & Revise: Underway now til early April 2021 We will provide a review of feedback received specifically on the Climate Action Plan and staff recommendations in late April 2021 (to support Council's decision making on the LTP). Submissions on broader climate change content within the LTP will be included in the Issues & Options review on 29 April 2021.
	Decision Making June – July 2021 Elected members to consider recommended amendments - June 2021. Elected members to formally adopt the Climate Action Plan - July 2021.
	Implementation Actions implemented and monitored Council to receive annual progress reports

2.3 Progress Review of the Corporate Sustainability Strategy

A review of Council's progress against the actions in the Corporate Sustainability Strategy (CSS) adopted in November 2018 is included in **Attachment A**.

As acknowledged in the CSS, actions would be incorporated in the Long Term Plan.

Also acknowledged within the CSS was the need to have a dedicated staff resource available to implement the actions. COVID-19 halted the process to hire a Corporate Sustainability officer who would have been responsible for delivering the actions. Hence, some actions previously underway have not progressed to completion. Of the 20 actions we have:

- 2 completed;
- 9 underway or underway & ongoing
- 9 that are not ready to start. This is mainly because we currently do not have resources available to undertake the work or that they are of a lower priority.

Staff will provide an overview of key actions within this Briefing.

The 2021-31 LTP that we are about to engage on is the first LTP since the adoption of this strategy. Some actions which required resourcing from Council are included in the draft 2021-31 LTP.

If resources are confirmed through the 2021-31 LTP decision making process, the initial priority will be to move through the current actions which are underway, but not yet completed.

2.4 Draft Submission to the Climate Change Commissions: National Emissions Reduction Plan and National Emissions Budget

The Climate Change Commission released its 2021 draft advice to government for public consultation. You can read it here:

<https://www.climatecommission.govt.nz/get-involved/our-advice-and-evidence/>

The Commission's advice package consists of Part A and Part B.

Part A has seven chapters and covers:

- The recommended quantity of emissions that will be permitted in each emissions budget period
- The proportions of an emissions budget that will be met by domestic emissions reductions and domestic removals, and the amount by which emissions of each greenhouse gas should be reduced to meet emissions budgets and targets
- The appropriate limit on offshore mitigation that may be used to meet an emissions budget, and an explanation of the circumstances that justify the use of offshore mitigation
- How the emissions budgets, and ultimately the 2050 target, may realistically be met, including by pricing and policy methods
- The direction of the policy required in the emissions reduction plan for that emissions budget period
- The rules that will apply for measuring progress towards meeting emissions budgets and the 2050 target

Additional considerations, Part B, includes:

- The country's Nationally Determined Contribution
- Eventual reductions needed in biogenic methane emissions

Staff from the four Northland councils have drafted a joint submission (**Attachment B Draft Joint Submission to the Climate Change Commission**) responding to the Consultation Questions that are asked by the Climate Change Commission. This is a large and technical document and an overview of both the report, and the submission, will be provided in this Briefing.

Attachment B is still a draft document and subject to change based on the feedback of councillors. Submissions close on the Sunday 14 March. We are seeking initial feedback from councillors in this session prior to amending it for sign off (due to the timeline the submission will need to be signed off under delegation).

3 Attachments

- **Attachment A:** Progress Review of the Corporate Sustainability Strategy
- **Attachment B:** Draft Joint Submission to the Climate Change Commission

Attachment A – Progress Review of the Corporate Sustainability Strategy

One of the key short term actions from the Strategy was employment of a Corporate Sustainability Officer to co-ordinate the programme and provide expert technical expertise. As previously reported to Council this action was well underway but as part of our response to COVID-19 recruitment was put on hold. While key actions have continued to be worked on, though at a reduced pace, in the absence of this position (largely through co-ordination from the Strategy Team) a number of actions have not started or progressed. Resourcing for sustainability and waste minimisation has been prioritised by Council in the draft LTP, which will be subject to consultation and final decision making by Elected Members. This would enable a number of actions to progress and/or be completed.

Action	Who Leads	Timeframe	Priority	Status	Comments / Progress
Employ a Corporate Sustainability Officer	Corporate (<i>budget under Strategy & Democracy in the draft LTP</i>)	Short	High	Not ready	Budget included for consultation in the draft LTP. Co-ordination is being provided by Strategy until consultation is complete and budgets confirmed.
Establish sustainability champions within Council	Office of the CEO	Short	High	Complete	
Develop emissions inventory	Infrastructure Corporate <i>Currently led by Strategy & Democracy</i>	Short	High	Underway	eBench (resource use tracker) contains the following: <ul style="list-style-type: none"> - electricity use across all Council owned ICPs; - Fossil fuel use for Council owned vehicles; -flight data 2018-March 2020 (both short haul and long haul air travel); - We also have paper use statistics to into eBench. <p>This is progress from 2019. Technical resource is required to complete this action.</p>

Action	Who Leads	Timeframe	Priority	Status	Comments / Progress
Undertake an audit of energy and water use	Infrastructure Corporate	Short	High	Not ready	
Undertake an audit of our internal waste including hazardous waste and recycling	Infrastructure Corporate	Short	High	Underway	Near completion. Provision of budget through the LTP would enable completion.
Develop an energy and water use management programme	Infrastructure Corporate	Short	High	Not ready	
Introduce energy and water saving devices where identified through audits and management programmes	Infrastructure Corporate	Medium	High	Not ready	
Include sustainable design and energy and water saving measures in upgrades to or new Council buildings	Infrastructure Corporate	Medium	High	Underway - ongoing	<ul style="list-style-type: none"> • Civic Building design. • Include as BAU for other buildings. • Guidance resources needed to support staff
Develop a waste management programme to avoid creating waste and reduce waste to landfill	Infrastructure Corporate	Short	High	Underway	
Zero waste events	Venues & Events Social Club	Short & ongoing	High	Underway - ongoing	Underway by Venues and Events team and Business Support. Need training & support for internal events.

Action	Who Leads	Timeframe	Priority	Status	Comments / Progress
Promote sustainable travel options through a Green Travel Plan	Infrastructure Corporate People & Capability	Short	High	Not ready	
Develop a remote working policy	People & Capability	Medium	Medium	Near complete	Draft prepared – complete. Targeted engagement with staff – complete. Policy expected in 2 weeks.
Introduce sustainable procurement practices	Corporate	Short	High	Underway	Policy is complete. • Guidance resources needed to support staff • Include in procurement templates & reporting documentation
Introduce sustainable and ethically sourced materials, reduced emissions and waste outcomes in contractor management	Corporate	Medium	High	Not ready	LTP resource would assist in completion of: • Guidance resources needed to support staff; • Development of procurement templates & reporting documentation
Direct Council's superannuation provider and any other investment portfolios to reduce funds exposure to fossil fuel reserves and carbon emissions	Corporate	Long	High	Not ready	

Action	Who Leads	Timeframe	Priority	Status	Comments / Progress
Reduce food miles and energy that goes into food production	Corporate	Medium	Medium	Not ready	Draft LTP budget would assist in co-ordination of this action. Need training & support for the Social Club & Business Support for internal events.
Reuse of material from demolition work for new builds / rebuilds.	Corporate Infrastructure	Medium	High	Underway	<ul style="list-style-type: none"> • Included in the Civic Building design. • Include as BAU for other buildings as part of maintenance and renewals. • Guidance resources needed to support staff
Proactive communication	Corporate	Short & ongoing	High	Underway	<ul style="list-style-type: none"> • Need process for staff to update project lead & inform comms team • Sustainability champions key role
Promote sustainability through Council activities	All	Medium	Low	Not ready	Needs coordination by project owner to progress but sustainability champions will play a key role
Participate and show leadership in climate change / sustainability networks and programmes	Corporate <i>Currently led by Strategy & Democracy</i>	Short & ongoing	Medium	Underway - ongoing	

Attachment B -

17 February 2021

To He Pou a Rangi Climate Change Commission,

Ngā mihi nui ki a koutou kātoa.

Te Taitokerau Northland Councils are pleased to submit on the Climate Change Commission's draft advice package. This is a joint submission from Northland Regional Council, Far North District Council, Kaipara District Council and Whangārei District Council (Northland Councils).

As Northland Councils, we recognise and affirm that urgent action is required at all levels of government to respond to the climate change crisis and reduce the risk of further harm by reducing emissions. Urgent action to reduce emissions is critical to Aotearoa New Zealand's contribution towards the long-term goals of the Paris Agreement, and to reach a global peak in emissions as soon as possible and a decline thereafter. We support that this will be achieved in accordance with the best available science, and that uncertainty is not a reason to delay.

While emissions reduction is largely led by central government, Northland Councils recognise that local government has an important responsibility to work together with central government towards our national emission reduction targets and to support resilience in our communities in the low emissions transition.

We recognise that Northland Councils can lead by example to achieve a low emissions transition by:

- aligning with national emissions targets,
- establishing measurement and reporting processes,
- implementing actions.

We recognise our role in leading, supporting and coordinating Te Taitokerau Northland's transition to a low emissions society through regulatory and non-regulatory functions. We also recognise the unique relationships Northland councils have with local communities, businesses, tangata whenua and iwi and hapū partners. These relationships will be essential in our transition.

Northland Councils are already working together on a collaborative approach to adaptation. We view this submission as an opportunity to inform national mitigation direction and a national low emissions transition. Outside of this submission, each council is separately establishing its own organisational emissions measurements and reporting processes.

Northland Councils also see this submission as an opportunity to provide feedback on whether the emissions budgets and emissions reduction plan will support the needs of Te Taitokerau Northland and enable a just transition for our communities.

Here are some considerations Northland Councils would like He Pou a Rangi Climate Change Commission to consider.

- We are a predominantly rural region.
- We have a high proportion of Māori, roughly 40% of Te Taitokerau Northland's population is of Māori descent, with nine iwi, 250+ hapū, and relatively few settlements with the Crown.
- Areas of the region are experiencing rapid growth and development, especially those areas connected by the state highway to Tāmaki Makaurau Auckland.
- Our local economies are predominantly manufacturing and primary industries which are sensitive to carbon pricing and any future biogenic methane pricing.
 - Throughout most of the region we have a primary production economy in a low-productivity natural environment,
 - We have high contributing industries that will need a lot of support to transition, for instance the cement works and refinery.
- Our region has large gaps in income and average wage, access to health services and access to infrastructure services. Māori are disproportionately represented in deprivation statistics.
- Our communities' mobility and connectivity are heavily road and vehicle dependent. We have limited public transport and low patronage and limited electric vehicle infrastructure; however, with high levels of EV vehicle ownership for our population
- Land use in the region presents opportunities for removals and offsetting.
- Our climate and land value present opportunities for developing renewables infrastructure.

Northland Councils reinforce He Pou a Rangi Climate Change Commission's objective of a just, equitable transition. For Te Taitokerau Northland, equitability is critical to the success of emissions budgets, the emissions reduction plan and long-lasting climate action.

Te Taitokerau Northland Councils offer their local government input to aid in understanding the region's unique context and to use the Region's strengths to achieve a low emission, equitable future. We also offer to provide further feedback and to regularly contribute throughout He Pou a Rangi Climate Change Commission processes.
Kia ora rawa atu.

Nā mātou noa, nā

SIGNATURES AND LOGOS TO GO HERE

Submission explanation

Please note, three additional document management edits will be made prior to submitting:

- We will remove colour coding. This is for councils' reference only.
- We will remove blank subsections where specific councils have not added any subpoint.
- These document management points will be removed and only acronyms and or necessary consultation explanations will remain.

Colour coding:

Staff have graded the questions according to relevance to councils and/or Te Taitokerau Northland context.

Low relevance or significance, or accept recommendations as read.	Some relevance, significance, or recommended change.	High relevance, significance, or area of concern.

Acronyms

FNDC = Far North District Council

KDC = Kaipara District Council

WDC = Whangārei District Council

NRC = Northland Regional Council

LG = Local government

Consultation question responses

Question 1	Principles to guide our advice Do you support the principles we have used to guide our analysis? Is there anything we should change, and why?
All Councils	We are supportive of the principles. In addition, we make the following comments: Principle 3: Te Ao Māori and Mātauranga Māori must inform the development of options as this will bring in a lens that considers consequential actions and balance. Principle 4: In terms of cost, it should be acknowledged that we are not currently experiencing the true cost of using resources; it is future generations who will bear the heaviest burden of environmental degradation.
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> Should there be an explicit reference to working with Māori and the He Ara Waiora framework here?

Question 2	Emissions Budget Levels Do you support budget recommendation 1? Is there anything we should change, and why?
All Councils	Supportive.
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> Are the yearly budgets aspirational enough in the short term? Do they reflect the urgency of the climate crisis and transformative change required?

Question 3	Breakdown of emissions budget Do you support our proposed breakdown of emissions budgets between gross long-lived gases, biogenic methane and carbon removals from forestry? Is there anything we should change, and why?
All Councils	Generally supportive. We also recommend: <ul style="list-style-type: none"> Change the term 'forestry' to 'biological carbon removal' Consider other carbon sinks e.g. wetlands, mangroves, peatlands, seagrasses. Develop mechanisms that encourage and reward carbon sinks that achieve multiple outcomes in addition to sequestration such as growing the soil sponge, supporting the growth of species for rongoa, providing habitat for taonga species. This is discussed further in the response to Consultation Question 10 & 11.
FNDC	
KDC	

WDC	
NRC	<ul style="list-style-type: none"> • Is it appropriate to include domestic electricity generation within the same category as heavy industry? • Should biogenic methane emissions be reported in terms of CO2-e to align with other emissions?

Question 4	Limit on offshore mitigation for emissions budgets and circumstances justifying its use Do you support budget recommendation 4? Is there anything we should change, and why?
All Councils	Supportive, no comments.
FNDC	
KDC	
WDC	
NRC	

Question 5	Cross-party support for emissions budget Do you support enabling recommendation 1? Is there anything we should change, and why?
All Councils	Supportive, no comments.
FNDC	
KDC	
WDC	
NRC	

Question 6	Coordinate efforts to address climate change across Government Do you support enabling recommendation 2? Is there anything we should change, and why?
All Councils	Supportive.
FNDC	
KDC	<p>KDC supports this recommendation and offers specific ideas on the ways to coordinate:</p> <ul style="list-style-type: none"> • Health & Planning: urban heat reduction principles, green space & amenity planting • Education: resilience and self-sufficiency: Zero waste education institutions. Zero emissions schools. • Justice: rehabilitation & community service schemes focused on afforestation and amenity planting, community gardens • Social Development: training incentives for carbon zero projects and vocational opportunities • Environment: Increase budget to enable more funding into the regions • Tourism: introduce a levy on foreign tourists to be applied to carbon zero outcomes
WDC	WDC supports and would like to emphasise that, if implemented, the recommendation also sets up the internal 'infrastructure', ownership and necessary budgeting required for delivery. From our internal experience delivery is challenging if an 'across-organisation' approach is not in place.

NRC	<ul style="list-style-type: none"> Should there be more explicit emphasis on transforming existing work programs across government to achieve zero-carbon objectives? For example, revisiting MPI goals of increasing agricultural production, public housing program, NZTA roading investments. Should there be more emphasis on updating all government policy and legislation to embed zero-carbon objectives?
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Question 7	Genuine, active and enduring partnership with iwi/Māori Do you support enabling recommendation 3? Is there anything we should change, and why?
All Councils	<p>We are very supportive of this recommendation. This is a very relevant requirement for Te Taitokerau Northland. Northland Councils are working with hapū/iwi to bring Te Ao Māori and Tikanga Māori into our adaptation and mitigation activities. This work is resource intensive for both partners. Therefore, we seek the inclusion within Recommendation 3 that funding and resourcing is made available to both LG and hapū /iwi for engagement, planning, decision making and implementation. We would also like to see a recommendation on development of guidance or best practice examples in terms of LG and iwi/hapu partnership processes in climate change response.</p> <p>We note that the sole focus on forestry as a carbon sink addressed in Consultation Questions 3 and 11, could conflict with the intention to enable kaitiakitanga and acknowledge rangatiratanga.</p>
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> Does the recommendation uphold our Treaty obligations? Does it allow for a true partnership with Māori during the development and implementation of the zero-carbon transition? Should the progress indicator be more ambitious? E.g. Require evidence of actual engagement during the process of developing the emissions reduction plan ERP, rather than merely a plan for how they will partner during its implementation?

Question 8	Central and local government working in partnership Do you support enabling recommendation 4? Is there anything we should change, and why?
All Councils	<p>We support the recommendation and the progress indicators. We would like the progress indicator on partnership to clarify who is responsible for tracking any work plan at a regional level and at a national level. We would also like to see the progress indicators ensure clarity on how alignment will be implemented and assessed at a consent and monitoring level.</p> <p>We also have concerns regarding limited staff capacity, training requirements, and ease of access and process for funding applications and we would like the government work plan to consider these issues.</p>
FNDC	
KDC	
WDC	WDC generally supports this recommendation.

	<p>In response to Point A, we recommend that a National Policy Statement and National Environmental Standards are developed to support implementation by LG consent departments.</p> <p>Clarity is needed as to what the roles of different Council functions are in achieving emissions reductions (e.g. should the Building Act or District Plan be the primary legislation responsible for achieving certain standards such as alternative energy sources for homes?).</p> <p>What mechanisms will be in place to better manage cross boundary effects between different local government authorities?</p> <p>In response to Point B, we advocate for funding mechanisms and funding to be made available urgently for LG. This includes funding models that LG could administer to support action by the community for initiatives such as green infrastructure. Funding mechanisms available to support Councils to reduce their own emissions should be enduring and sustainable. Funding will enable Councils to lower their emissions quicker than what the LTP cycle enables. For example, WDC have the assets and resources available to construct and operate infrastructure diverting organic waste from landfill. We do not have the funding available to operate the collection process.</p>
NRC	<ul style="list-style-type: none"> • Does the recommendation recognise regional differences in terms of transition challenges and local government capacity? • Many of the recommendations to achieve emissions reduction in the report rely on local government to drive behaviour change and private emissions reductions (e.g. transport, waste, land-use, urban form etc). <ul style="list-style-type: none"> o Is there clarity as to the role of local government in the zero-carbon transition, and identification of risks (e.g. financial, capacity, supporting legislation etc)? o Are the recommendations sufficient to enable local government to achieve these aims (many of which have been aspirational targets for years, but unachievable given current governance arrangements)? • RMA consenting processes will soon be able to consider GHG emissions. If the RMA is to be used as a mechanism to control emissions, transparent tracking of emissions, especially for large industrial emitters is essential to enable the achievement of national emissions budgets. Northland has a number of large emitters including the Portland cement works and Refining NZ. <ul style="list-style-type: none"> o Does the recommendation support regional councils to implement the RMA? o Should there be more support through a responsible agency and clear policy direction on mechanisms to enable GHG emissions to be included in consent conditions? • Are the progress indicators sufficient? <ul style="list-style-type: none"> o Should there be a requirement to show evidence of improved partnerships with local government? o Should there be an indicator to show evidence that legislation and policy has been reviewed and updated to enable the required actions by local government? o Should there be an indicator to show evidence that a funding mechanism has been put into place, rather than just a work program?

Question 9	Establish processes for incorporating the views of all New Zealanders Do you support enabling recommendation 4? Is there anything we should change, and why?
All Councils	<p>We are very supportive of this recommendation. We would like the recommendation to include ways to enable LG to also enact this, i.e. creation of an information hub or database with localised examples of inclusive engagement in action, especially youth.</p> <p>We would like the recommendation to consider the connection between adaptation and mitigation. Many councils are working to develop more inclusive practices for adaptation. We are interested to see how these could transfer to mitigation.</p>
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> • The UK experience of citizen's climate assembly was that many of the recommendations were not implemented leading to lack of trust in the process. <ul style="list-style-type: none"> ○ Does the recommendation sufficiently address how to ensure sincerity in the process?

Question 10-11	<p>Locking in net zero</p> <p>Do you support our approach to focus on decarbonising sources of long-lived gas emissions where possible? Is there anything we should change? Do you support our approach to focus on growing new native forests to create a long-lived source of carbon removals? Is there anything we should change, and why?</p>
All Councils	<p>We are supportive of increasing the focus on native forests and balance with plantation forestry. We appreciate the degree of awareness regarding community impacts and land-use and biodiversity issues that can come with plantation forestry.</p> <p>We would like to see Te Ao Māori and Māori values guiding this approach.</p>
FNDC	
KDC	<p>KDC would like to emphasise their support of the approach afforestation with non-exotic species to offset emissions and sees this as an approach with many localco-benefits. For example, the Northland Totara Working Party has been working on a pilot for totara as a plantation forest. The direction of this group is to search out a more lucrative and environmentally improved form of forestry. They have identified totara as highly potential. There is also valuable work for using the continuous cover forestry model, which could work very well for this District/Region.</p> <p>KDC would like recommendations that provide more direction on how an afforestation approach could be linked to large-scale environmental projects already underway, for example multi-party projects like the Kaipara Remediation Programme.</p>
WDC	<p>WDC also recommends:</p> <ul style="list-style-type: none"> • considering other carbon sinks, i.e. wetlands, mangroves, peatlands, seagrasses. • developing mechanisms that encourage and reward carbon sinks that achieve multiple outcomes in addition to sequestration such as supporting the growth of species for rongoa, providing habitat for taonga species. <p>WDC makes the above recommendation with the understanding that it would align more closely with the expectations of the hapū/iwi in Taitokerau than a sole focus on forestry and that it offers more development opportunities for the use of assets returned through Treaty Settlements. WDC also note that a sole focus on forestry as a carbon sink may conflict with the intention of Enabling Recommendation 3 regarding kaitiakitanga.</p>
NRC	<ul style="list-style-type: none"> • Does the focus on reducing long-lived gases vs short-lived gases including methane (i.e. agricultural sector) provide clear enough direction to drive change in land use? • Does the focus on new native forests vs exotic plantations align with NRC's objectives for kaitiakitanga of the land? • Are there supporting policies to enable the conversion of low-productivity farmland to native forests? • Are incentives sufficient to drive afforestation? Is the ETS sufficient? Will a farm-based carbon pricing mechanism support land-use change? • Should other carbon sinks such as peatland, wetlands, riparian strips, mangroves, saltmarsh, seagrass and marine blue carbon also be included as biological carbon removals?

Question 12	Our path to meeting the budgets Do you support the overall path that we have proposed to meet the first three budgets? Is there anything we should change, and why?
All Councils	<p>We found this formatting somewhat confusing. We read section 3.5 as a combination of high-level methodology addressing the overall approach and more specific recommendations on actions. We were uncertain how to target our responses and how much detail to provide.</p> <p>We have one general comment regarding how the information is presented and how this could influence policy response. The pathway approach groups domestic electricity with industry and heat. These components involve very different end users/user grouping. We would recommend that any recommendations need to emphasise this difference and account for that in any recommendations on policy.</p> <p>Te Taitokerau will be heavily impacted by key transitions and timing for transport and heat, industry and power. We support the focus and timelines but as of now, do not have the infrastructure, strategies or regulatory tool kits ready to reach the recommended key transitions. We emphasise the need to have equitable, resourced and well-aligned transition plans in place. We discuss this in more detail in Questions 13-18.</p>
FNDC	
KDC	
WDC	<p>WDC reiterates the urgent need for funding and funding models to be in place to enable LG to respond as appropriate for a climate crisis particularly where these are for new builds. For example, we have the resourcing available to establish the infrastructure to use diverted organic waste from landfill but we do not have the resources to operate the on-going collection process.</p>
NRC	<ul style="list-style-type: none"> • Is the overall balance right? • Should domestic electricity be included in the same grouping as industry, as it requires different policy responses? • Heavy industry is assumed to continue using gas and coal in the first 3 carbon budgets. <ul style="list-style-type: none"> ○ Should there be more focus on providing incentives and support for these industries to transition (especially considering the existing industrial allocations of NZUs in the ETS)?

Question 13	An equitable, inclusive and well-planned climate transition Do you support the package of recommendations and actions we have proposed to increase the likelihood of an equitable, inclusive and well-planned climate transition? Is there anything we should change, and why?
All Councils	<p>This is very relevant for Taitokerau's communities and our agricultural, industry and forestry economies. We have communities that will be particularly affected by climate change: rural, remote, limited access to services, road and driving dependent, coastal/low-lying, high proportion of Māori communities.</p> <p>We are supportive of training to grow a Taitokerau workforce to enable continued employment and mitigate job loss. We are interested in funding models for LG to support this transition, as well as funding models direct to community organisations and iwi and hapū.</p> <p>We would like recommendations to include adaptation more strongly here. Northland Councils are starting on dynamic adaptive pathways decision-making and any localised adaptation decisions and strategies will impact this transition.</p>
FNDC	
KDC	<p>KDC is very supportive of recommendations to promote native forestry to prevent against over-reliance on plantation forestry and to mitigate job loss. We are very supportive of any recommendations to extend grant schemes such as One Billion Trees or to create ecosystem services payments. We would like more information on how this could be enabled and aligned and encourage the proposed Equitable Transition Strategy to address this.</p>
WDC	
NRC	<ul style="list-style-type: none"> • Is this recommendation consistent with the overall direction of the guidance? • Do the recommendations sufficiently address potential disproportionate impacts on Te Taitokerau? (particularly rural, Māori and underprivileged) • Does it sufficiently address the potential social, economic and environmental impacts and opportunities of a zero-carbon transition? • Are future generations sufficiently considered when addressing equity, and how is this realised in planning and decision-making?

Question 14	Transport Do you support the package of recommendations and actions for the transport sector? Is there anything we should change, and why?
All Councils	<p>We would like the recommendations to include more detail on how these actions could work. Many are not new initiatives, so how do we give these greater teeth? We would also like analysis on the implementability of these transport actions. Analysis and guidance on what we could do differently to learn from past attempts would enable faster and more effective uptake of transport mode change.</p> <p>This recommendation is very relevant for Taitokerau. We are a dispersed, rural region with many unsealed roads. The charging network is inadequate, particularly in the West Coast of the region. Our communities' mobility and connectivity is heavily road and vehicle dependent. We have limited public transport and low patronage and limited electric vehicle infrastructure; however, with high levels of EV vehicle ownership for our population.</p> <p>Currently, the majority of EVs at the affordable range are inadequate for use on the unsealed roads. Therefore, a quick uptake of EVs with greater off-road capability would help. There are also partnership opportunities with other agencies and organisations to enable greater provision of EV charging infrastructure across the region, for example marae.</p> <p>We would like the Equitable Transition Strategy proposed in Time-critical necessary action 1, progress indicator, to address how EV uptake and transport mode shift could be incentivised for our low-income and/or rural communities to ensure that those more vulnerable are not penalised.</p> <p>Necessary Action 2 – Considering LG's role, planning and transport are highly interlinked. Land use planning is a major component and is a long-term process. Given that mode use change is a big focus in approach and that LTPs are being drafted now, how do we ensure the funding available to LG is enduring so can be included in LTPs? We also recommend that the charging infrastructure plan include clear direction on how it will be synced across government.</p> <p>We appreciate the co-benefits of Necessary Action 4 in terms of increased safety for cyclists, pedestrians and drivers.</p>
FNDC	
KDC	<p>Feasibility and design phases for smaller councils is resource intensive because it usually requires external professional services. This is a major barrier to projects that enable transport mode shift. KDC emphasises the need for a recommendation to increase resources and funding streams to jump start these processes.</p>
WDC	<p>Supportive of the alignment shown between the recommendations and other already existing policy including the NPS-UD and the GPS.</p> <p>WDC recommends:</p> <ul style="list-style-type: none"> • Better alignment between the future transport direction and local government funding.

	<ul style="list-style-type: none"> • More research into either already existing or new incentives that will help those vulnerable communities to having access to EV's. • Acknowledging with the new transport recommendations, there are specific needs that should be addressed for those living with a disability, particularly around accessibility and the affordability of alternative transport services.
NRC	<ul style="list-style-type: none"> • Given the existing challenges of changing travel behaviour to alternative modes, do the recommendations sufficiently support the assumptions depicted in emissions reductions due to reduced travel demand and mode shift? • Is additional support required to drive short-term behaviour change, given the need for changes to urban form to support alternative transport? • Given our rural population, are the assumptions around reduced travel and EV uptake realistic to be included in the emissions model? Are there other incentives or drivers required to achieve these outcomes? • Staff support the recommendations on transport in general, and in particular the additional support that will be required for more remote communities such as those in Te Taitokerau to ensure that they are not disadvantaged, and also noting that it is important that overall private car ownership must decline over time, so policies should not result in increased numbers of vehicles (i.e. it is truly a fleet replacement strategy and scrappage of ICE needs to be factored in). • Fully support the need to better provide for and enable walking and cycling and modal shift for freight from road to rail and coastal shipping. • Staff also note that as there is no consideration of recreational boats and emissions from outboard motors (particularly carburettored 2-strokes see for e.g. https://www.maritimenz.govt.nz/recreational/the-basics/documents/Two-stroke-VS-four-stroke.pdf) and this is a key "missing" sector and if not properly accounted for will mean that the policies adopted will target cars and not address the large number of recreational vessels that are used on a daily basis (annual emissions from the 4 boats owned by NRC are similar in scale to those of the NRC fleet). Many countries have already banned older 2-stroke outboards due to their emissions, and electric motors (inboard and outboard) are already commercially available in NZ – and a similar policy approach to EVs for land can be taken for transitioning the recreational fleet from petrol outboards with mandatory emissions rating systems (such as that used in Australia) would assist consumers in making informed purchase choices. 2020 research found that 45% of kiwis participated in recreational boating in the past 12 months (1.67 million people) with kiwis owning an estimated 560,00+ small craft powered by motor https://www.maritimenz.govt.nz/recreational/safety-campaigns/documents/Recreational-boating-survey-2020.pdf. Emissions testing done by the US EPA found that one hour of operation of an outboard powered motor boat (with a relatively clean engine that met the 2006 EPA regulations) produced the same pollution as about 50 cars operated at a similar ground speed. However, they also found that older style outboard engines that did not comply with US EPA 2006 limits were likely to emit around 10 times the amount of pollution compared to conforming outboard engines – that's the equivalent of 500 cars - so assuming worst case scenario of all the estimated outboards in NZ being powered by older model 2-strokes – emissions of outboards from

	<p>recreational craft would equate to that of 280 million cars. This is a sector that is completely missing from the Advice and needs to be rectified – and, at a minimum, the Advice should note that there is no data on outboard ownership available and that maritime recreational emissions have therefore been included as “land transport” emissions. Mandatory registration of all watercraft is an essential starting point to enable more accurate data to be gathered.</p> <ul style="list-style-type: none"> • In regards to Necessary Action 4 (low carbon fuels for trains, ships, heavy trucks and planes): There are numerous options to reduce emissions from the existing vessels without any technology change or switch to alternative fuels (significant emissions reductions can be achieved from operational changes such as reducing speed, propeller pitch, engine tuning, just-in-time arrivals, hull coatings etc) and these should be implemented immediately. Wind propulsion is also an obvious solution for shipping (it was not that long ago when all freight and most passengers were transported by wind-powered ships) and is available today and can be incorporated into retrofit (e.g. flettner rotors and sails) as well as new builds. There is huge potential for reinvigorating the boat building industry with a focus on zero carbon vessels in Te Taitokerau for not only NZ but also our Pacific neighbours (many of whom already have strategies in place to shift to zero carbon vessels) which requires collaboration between the private sector, government and researchers if this opportunity is to be maximised and lots of the skillsets are already available in the workforce (e.g. from the yachting industry). • We fully support the modal shift of freight to coastal shipping but note that this will require significant investment in wharves and jetties in secondary and minor ports/harbours if the full potential for this modal shift is to be realised. Ports themselves are critical in supporting the decarbonisation of the maritime transport sector (including visiting international ships) with provision of infrastructure for cold ironing as well as other mechanisms such as reduced port fees for greener ships. NZ should also follow closely the innovations happening globally on alternative low carbon fuels, with ammonia, methanol, green hydrogen (and wind power) being the front runners currently for international shipping. • The recommended actions should include a National Action Plan for domestic maritime emissions reduction to be lodged with the International Maritime Organisation by 31 December 2022
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Question 15	Heat, industry and power sectors Do you support the package of recommendations and actions for the heat, industry and power sectors? Is there anything we should change, and why?
All Councils	<p>Necessary Action 5, Point D, is especially relevant for Te Taitokerau context. Many areas in our region already experience unreliable electricity network and there are concerns over network capacity. We emphasise that an assessment of Te Taitokerau's (and each region's) capacity and potential would be an important first step towards a national energy strategy. We would like more information about how Necessary Actions 9 & 10 would be enabled, especially how they would be aligned with council planning processes like District Plans and Regional Plans, including timeframes for inclusion.</p> <p>We support Necessary Action 5 and particularly appreciate Points D, E, and F. We reinforce the recommendation to enable community-based energy generation. Many of our communities experience higher costs for electricity compared to other parts of Aotearoa and we have communities and families living with energy poverty. At the same time, there are opportunities in Te Taitokerau to house infrastructure for renewables generation and increased expansion in electricity system. We believe these actions would support a more equitable transition, increase wellbeing, and enable long-term, transformative change.</p>
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> • Does the recommendation sufficiently address the issue of energy poverty in Northland? Does it sufficiently drive renewable energy production locally? • Should embodied energy in new buildings be addressed alongside energy efficiency, in particular the use of high-carbon footprint materials such as steel and concrete? Is there an opportunity to align investment in new low-carbon building material production (e.g. engineered wood products) to reduce consumption of carbon-intensive products? • Heavy industry, a hard-to-abate sector that includes petroleum and cement production, is not targeted for transformative change in this advice. In addition, NZU industry allocations mean that market mechanisms will not be forcing emissions-efficiency for heavy industry. <ul style="list-style-type: none"> o Are the recommendations appropriate to enable long-term transformation of these important local industries?

Question 16	Agriculture Do you support the package of recommendations and actions for the agriculture sector? Is there anything we should change, and why?
All Councils	<p>We are supportive of a pricing mechanism for agriculture emissions but would stress the need for farmers to be provided enough support, training, and sufficient time to transition.</p> <p>We are interested in how the mechanism could account for smaller scale sequestration in a manner that the ETS currently does not. We question the assumption that increased efficiency can drive reduction in herd numbers.</p> <p>We would like to see the recommendation on research funding also include research on international and domestic market options – e.g. further secondary processing creating high value product to reduce high throughput requirements characteristic of current agriculture, particularly dairy. The dominant approach requires high throughput of resources as opposed to quality.</p> <p>We would also like to see a recommendation to address actions to increase awareness with farmers about other opportunities (understanding that a review of E Waka Eke Noa is forthcoming and that this could be included in this review).</p>
FNDC	
KDC	
WDC	<p>WDC has a growing responsibility to advocate for the needs for our rural communities.</p> <p>WDC recommend:</p> <ul style="list-style-type: none"> • New support packages to assist the agricultural sector to properly engage in the ETS. • Opportunity for local authorities to be engaged in the He Waka Eke Noa work programme. WDC will have a role assisting our rural communities reduce their emissions profile.
NRC	<ul style="list-style-type: none"> • The commission's advice largely assumes continuity of existing land-uses while achieving emissions reductions. <ul style="list-style-type: none"> o Are the assumptions regarding ongoing increases in efficiency (e.g. milk protein/meat per animal) leading to herd size reductions realistic, especially in Northland's rural sector? o Should more focus be placed on a transition away from emissions-intensive agriculture toward sustainable production and high-value or niche products (e.g. eel/tuna; industrial hemp; horticulture)? What enablers are required for Northland? o International markets are assumed to continue. Should the potential impacts of an international carbon price on shipping be considered? • NRC already works closely with farmers and has an opportunity to help reduce on-farm emissions. There is also a synergy between climate adaptation in farm management and emissions reduction. A whole-of-farm approach will be more useful than a siloed approach and establishing a framework for on-farm sequestration may be useful (e.g. through small scale afforestation and peatland re-wetting).

	<ul style="list-style-type: none"> o Do the recommendations sufficiently align with our approach to land management? • Anecdotal evidence in our region indicates that increased regulation of wetlands (via the updated NPS for freshwater management) has created perverse outcomes including the destruction of some habitat. Enabling relevant on-farm habitat to be counted as biological carbon sinks, and bringing this into either the farm-based carbon pricing mechanism or the ETS would enable farmers to remove carbon and offset emissions while they work to reduce methane and fossil fuel emissions. There are also many co-benefits to this approach including ecological services and biodiversity. <ul style="list-style-type: none"> o Does the recommendation sufficiently support farmers to remove carbon on-farm?
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Question 17	Forestry Do you support the package of recommendations and actions for the forestry sector? Is there anything we should change, and why?
All Councils	<p>We suggest widening the scope of sinks and removal opportunities to Biological Carbon Removals. We are interested in why carbon sinks have not been recommended to include wetlands, peatlands, coastal blue carbon, pasture, hemp, riparian planting and smaller levels of planting. We are supportive of an audit of carbon removal options, like large scale forestry and other options like wetland. This would align with requirement to map wetlands under NZ NPS-FWM.</p> <p>We would be interested to see recommendations around how mitigation and carbon sequestration opportunities could be built into adaptation strategies, especially looking at regional spatial mapping of these opportunities. We would like to see a recommendation to develop robust accounting processes for non-forestry biological removals.</p>
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none"> • The commission focusses on large scale forestry (>50ha) to achieve carbon removals. <ul style="list-style-type: none"> o Does this align with existing approaches and opportunities for afforestation in Northland? o Does it sufficiently consider the impacts on Māori of using crown land for permanent forests where this land is potentially the subject of treaty negotiations? o Does the recommendation align with whole-of-catchment approaches that have the potential to reduce flood risk and sedimentation? o Does the recommendation address in enough detail the need to consider biodiversity outcomes and climatic shifts over time, given the projected shifts and composition changes in ecological communities under climate change scenarios?

	<ul style="list-style-type: none"> • Northland presents particular needs and opportunities for carbon removals both through afforestation and other biological removals, including coastal blue carbon. Given the projected landward expansion of mangrove, saltmarsh and seagrass habitats in Northland, and the existence of council-owned coastal stopbanks (e.g. Awanui) there is a great potential for carbon sequestration to be pursued as part of a coastal adaptation strategy. Other opportunities are likely to become evident with further investigation. <ul style="list-style-type: none"> o Do the recommendations enable regionally relevant and targeted carbon removals projects? o Is enough consideration given to the opportunity of alignment with and financial relationship to, climate adaptation and other environmental management projects? o Are the recommendations strong enough regarding enabling alternative biological carbon removal projects?
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Question 18	Waste Do you support the package of recommendations and actions for the waste sector? Is there anything we should change, and why?
All Councils	<p>We would like the recommendations to address how LG can be better enabled to develop infrastructure to support waste diversion, use of biofuels and minimisation of waste. We would also like to see a recommendation for an audit of approaches that have been successful / unsuccessful in the past. Additionally, we would like to know, what can we learn from international approaches and how can we trial those suitable to NZ.</p> <p>We would also like greater detail on how the approach considers equity. We have concerns that levies or any approaches that pass costs on to end-users may most significantly impact low-income families and/or rural, isolated families who do not have easy access to waste diversion services. We support the approach to “shift the burden of resource recovery away from communities and nature to manufacturers” outlined in Evidence Chapter 17 and would like to see this reflected more strongly in Necessary Action 13.</p> <p>We would like the approach more fully address farm waste as well as municipal waste and see recommendations regarding farm waste reduction and diversion.</p> <p>We also have concerns that industrial waste and construction waste are not present in this approach. The recommendation does not seem to consider embodied carbon in buildings and building construction waste. We would like to see the building sector better accounted for, beyond energy efficiency.</p>
KDC	<p>KDC is supportive of the two-pronged approach of reducing waste and increasing resource recovery. KDC is a small council with limited capacity to expand infrastructure to directly provide resource recovery services. The ‘best-practice’ examples are usually beyond our feasibility. Instead, we indirectly support community groups to reduce and divert waste, i.e. our support of Sustainable Kaipara. We recommend that any coordinated national strategy to reduce waste involves engagement with small councils, as well as community groups. Enabling localised reduction and diversion has co-benefits, including long term behaviour change, enhancing local capacity and expertise, and potential job creation and income streams.</p>
FNDC	
WDC	<p>WDC is supportive of the waste reduction approach and of the circular economy target.</p> <p>WDC recommend:</p> <ul style="list-style-type: none"> • Recognition the landfill levy is currently the main tool to influence people’s behaviours to waste disposal. • Inclusion for how the knowledges and expertise of Tangata Whenua can help guide the shift to the circular economy. • Concerns that punitive approaches will have heavy impacts on low-income communities. Explore other options to influence communities’ behaviours to waste disposal that are equitable to all groups.
NRC	<ul style="list-style-type: none"> • While the report acknowledges the importance of reducing waste, it does not address the issue of production and sale of high-waste items, in particular items that prevent easy avoidance of landfill through recycling or

	<p>composting. Given that methane production in landfills is largely due to the presence of putrescible/compostable matter, the report does not target those industries producing large amounts of this. It also does not suggest that the government make stricter provisions to direct councils to divert compostable matter from landfills. Without stricter legislation, councils will struggle to voluntarily implement compostable waste reduction schemes due to high cost of operation. In addition, many councils dispose of wastewater sludge in landfill, which significantly increases methane production.</p> <ul style="list-style-type: none"> o Does the recommendation sufficiently target landfill methane production and provide adequate policy solutions? • Does the recommendation adequately address the production aspect of the waste cycle?
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Question 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?
All Councils	<p>Necessary Action 15 – We have similar resource management comments as Question 8. We would like to see stronger recommendations around guidance regarding alignment, timing and how current RMA approaches will be brought in and phased out throughout RMA reform. We would like more focus on low carbon, resilient outcomes for Māori communities, incl. mechanisms for funding and implementation. We would also like to see more recommendations on the ways LG can bring adaptation and mitigation opportunities together, as these will be experienced together by our communities.</p> <p>Necessary Action 16 – We stress the need to ensure behaviour change is also supported with systems transformation-legislative changes, service delivery changes, and education. Monitoring will be essential to understanding whether future behaviour programs are working. What is LG's role in this?</p> <p>Necessary Action 17/Time-critical action 6 – We would like stronger directives on financial risk disclosure and bringing in target-consistent, long-term abatement cost values (carbon unit prices) into investment and policy decisions. We emphasise that clear standards are needed for LG to meaningfully participate.</p> <p>Necessary Action 18 – We have concerns over about how rangatiratanga will be properly enabled and use of this term in this context.</p> <p>Time-critical action 7 – We would like to see recommendations around support for LG staff who may be involved with the ETS-administrative aspects, helping those communities to understand how many credits they have etc.</p>
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none"> • Inclusion of abatement costs in cost-modelling and decision-making is encouraging and would be useful to be applied to local government. <ul style="list-style-type: none"> ◦ Should abatement assumptions and procurement decisions regarding emissions be included in audit requirements for local government to clearly signal change? • Partnerships with industry are presumably covered in this section but receive scant attention. Government support of zero-carbon industry is essential to enable the realisation of the economic benefits during transition. New Zealand has a great opportunity to leverage existing knowledge and skills to develop low/zero-carbon industries that would benefit Northland such as low-emissions ship-building, high-value engineered wood products and low-emissions geothermal power generation. <ul style="list-style-type: none"> ◦ Does the recommendation sufficiently support govt-industry collaboration to incentivise the zero-carbon economy?

	<ul style="list-style-type: none">• A Māori emissions profile is useful, but may not enable rangatiratanga unless true partnership is acted on during the development and implementation of the emissions reduction plan.• The ETS currently allocates free NZU's to heavy industry, effectively insulating them from market-driven forces to incentivise emissions reduction. This also results in high-carbon products such as concrete being artificially low, as they are not paying the true cost of their carbon emissions.• Is the recommendation strong enough in regard to winding back the free allocation of NZU's to heavy industry?
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Question 20	Rules for measuring progress Do you agree with Budget recommendation 5? Is there anything we should change, any why?
All Councils	We are supportive. We recommend that the development of any methods for tracking emissions and target accounting needs to include removals by peatlands, wetlands, and marine sinks.
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none"> • Using a production-based carbon accounting approach does not include the carbon footprint of imported goods. This risks undercounting at an international level if countries of origin do not count the emissions created in the creation of the goods. It also restricts the ability for price-signals at the consumer level to drive low-carbon market choices. Consumption-based carbon emissions data has been produced by StatsNZ in 2020 and is a useful resource at the regional level but is not used in national carbon accounting. This creates a centralised/national carbon management approach. <ul style="list-style-type: none"> ◦ Is there need for further explanation or investigation of different carbon accounting approaches? • Given the large impact of land-use change in NZ's historic emissions, the potential exclusion of "cropland management, grazing land management, revegetation or wetland drainage and rewetting" (7.5.2) in NZ's NDC is of concern. <ul style="list-style-type: none"> ◦ Should there be more clarity about how this will be addressed in future carbon accounting approaches? • The exclusion of forest management practices potentially impacts the ability of regenerating pre-1990 forest to be claimed for carbon credits (7.6.1). This may impact large parts of Māori owned or treaty-settlement land in the north. <ul style="list-style-type: none"> ◦ Is there enough details on the exclusion of forest management and how accounting standards will improve this aspect over time? • Accounting of non-forestry carbon removals is currently not included in NZ's greenhouse emissions inventory (production or activity based). This has an impact on the ability to claim these as carbon offsets or generate income, and applies at multiple scales (e.g. on-farm offsets; regional carbon removal programs, national emissions accounting). • Should point Budget Recommendation 5.c.v be more directive to enable the inclusion of other biological carbon removal sinks such as peatlands within a set timeframe?

Part B

Questions 21-23	Nationally Determined Contribution (NDC) Do you support our assessment of the country's NDC? Do you support our NDC recommendation? Do you support our recommendations on the form of the NDC? Do you support our recommendations on reporting on and meeting the NDC? Is there anything we should change, and why?
All Councils	
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none"> Investment in the ability for less-developed countries, in particular our pacific cousins is essential. <ul style="list-style-type: none"> Should the report suggest a more specific level of overseas offset/investment to enable a just transition in the south pacific and elsewhere?

Question 24	Biogenic Methane Do you support our assessment of the possible required reductions in biogenic methane emissions?
All Councils	
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none"> The commission's report assumes a similar socio-economic trajectory for agriculture continuing into the future. This ignores potential impacts of market shifts, carbon tax impacts on shipping and other drivers. <ul style="list-style-type: none"> While it is difficult to know what agriculture will look like into the future, does the report need to go further in promoting and supporting the development of alternative, low/zero-carbon forms of agriculture?