27 April 2024

Submission on draft Tasman Climate Strategy and Action Plan 2024-2035

Dear Colleagues in TDC.

Thank you for the invitation to comment on the Tasman Climate Strategy and Action Plan 2024-2035 (‘the Plan’).

We are grateful for the Council’s support as a Climate Ally of the Nelson Tasman Climate Forum (NTCF).

We applaud the intention of the Plan to mainstream climate considerations across all Council activities, and its breadth of coverage.

Together we are striving towards the same goals, and we appreciate the creativity and hard work you dedicate to this. It is a pleasure to work alongside you.

Our submission seeks to support the climate change work of Council in fulfilment of its purpose and functions as local government for Tasman District. The Plan is described in the 2023 annual progress report as a primarily internally focused document. We recognise added value from this public consultation and that the revised Plan as a public document on the Council website will have educational value.

This submission is a consensus document from Nelson Tasman Climate Forum, having been reviewed by signatory members once for input, and a second time for approval.

Our submission introduces the Forum. Its structure thereafter follows that of the Plan.

We address proposed funding of the Plan in our Tasman 10 Year Plan (LTP) submission.

KEY POINTS OF OUR SUBMISSION

Our fair share, 7% reduction of CO2 and other long-lived gas emissions in our region each year: We explain our calculations for regional emissions reduction based on the country's international agreements**.**

Waste: Prohibit organic waste disposal in landfills. Reducing total waste to landfill by 10% per capita by 2030 is insufficient to meet emissions reductions plan targets. We request the Council, if not already doing so, give very high priority to instituting refrigerant recovery at its resource recovery centres.

Transport: Seriously engage with mode shift. Separated cycleways and much more.

Urban planning: No greenfield development. Elaborate on how the development of the Tasman Environment Plan and the revised Regional Policy Statement will address emissions reductions.

New infrastructure proposals: Emissions footprint of all new infrastructure matched to regional emissions budget.

Emissions monitoring: The Plan critically needs provisions for monitoring of regional emissions to be able demonstrate progress on reductions: publishing as soon as possible the monthly fossil fuel sales statistics the Council already has; developing and regularly publishing regional emissions; and showing emissions reductions alongside the financials for the options residents are being asked to choose amongst in the next LTP.

Information dissemination: We support your assigning high priority to advancing understanding so that people support transformational measures. We add some further ideas.

Agricultural emissions: We acknowledge these are difficult to deal with at regional level, but their extent warrants frequent ongoing engagement with sector groups.

Uncertainty over which parts of the Plan will proceed: numerous items in the Action Plan are unfunded, including all in outcomes 3 and 4 – Leadership and Information. The latter are allocated staff time, and it is possible other zero-funded items will be funded from other budgets. It is vital the Plan clearly states which items will proceed (and their constraints) and which are not funded at all.

Accurate information on climate change: We are seriously concerned that a good part of the climate information presented in Appendix 2 is dated, and the Plan doesn't recognise increasing evidence that climate change appears to be occurring faster, with more damaging impacts, than scientists previously understood. The submission of the NTCF Nature and Climate Group addresses this in greater detail.

NTCF funding request: We request TDC to contribute to funding the Nelson Tasman Climate Forum and Take the Jump (please see our LTP submission).

Nelson Tasman Climate Forum – Who we are

The Nelson Tasman Climate Forum (NTCF) is a community-based organisation with 150 members who have been active in the Nelson Tasman region for several years focussed on three goals:

1) Rapidly reducing our regions' greenhouse gas emissions

2) Adapting to the likely adverse effects of climate change

3) Responding to climate change in a way that recognises the rights of all living organisms and provides for a just, equitable and resilient society.

NTCF members bring a breadth and depth of expertise and experience, including scientific research and practice, social science, the health sector, monitoring and evaluation, education, environmental management, community engagement, communications and more. We have a deep understanding of the interlinked crises of climate change and biodiversity loss that result from past and ongoing degradation of the natural environment.

We work in our local communities to educate and empower people to take positive action on climate change, for example through the innovative behaviour change programme, Take The Jump. We get our hands dirty in planting programmes on public and private land, we trap pests and predators, we provide services such as The Repair Café to reduce waste and teach resilience, and provide resources for schools, businesses and families to help the broader community to think globally and act locally. We work closely with both Nelson City Council and Tasman District Council to support their mahi in protecting, restoring and enhancing the natural and built environments that we are privileged to call home.

Foreword

The Foreword from the Mayor and the CEO frames the document in the public's mind.

We see it as important that it also addresses our tamariki, mokopuna and future generations.

We recommend the statement (also in Setting the Scene) that the 'Strategy guides our transition to a low-carbon, resilient, and innovative Tasman District' be qualified along the lines of 'to the full extent of the Council's scope of activities and financial means'. While the Council has a primary role in adaptation at the front line, central Government will play a major part in emissions reductions in our region[1].

As the Plan covers all greenhouse gases, we recommend reference to 'carbon emissions' and 'carbon footprint' be broadened to include all greenhouse gas emissions, and 'carbon neutral' and 'low carbon' be referred to as 'net zero'. We base this on our reading of The meaning of net zero and how to get it right, and the definitions of emissions, greenhouse gas, and the 2050 target in the Climate Change Response Act 2002 and Climate Change Response (Zero Carbon) Amendment Act 2019. These Acts cover all greenhouse gases. The use of 'zero carbon' in the 2019 Amendment Act name seems to have been a political choice of the time. Reference to carbon or decarbonise is appropriate in some contexts e.g. sequestration, shifting buses to battery power, Carbon Neutral Government Programme.

Introduction

We recommend the Introduction acknowledge this finding in the recent IPCC Sixth Assessment Report (AR6) WGII Summary for Policymakers, by including it after the infographic:

Climate change impacts and risks are becoming increasingly complex and more difficult to manage. Multiple climate hazards will occur simultaneously, and multiple climatic and non-climatic risks will interact, resulting in compounding overall risk and risks cascading across sectors and regions. Some responses to climate change result in new impacts and risks.

This points to the increasingly complex, compounding and cascading nature of climate change risks. If the forthcoming Nelson Tasman climate change risk assessment reveals greater local climate change risks than hitherto anticipated, we recommend this be a key focus of the next review of the Plan.

Council's Vision

We propose: A low-emissions, resilient and innovative Tasman District *Te Tai o Aorere*, living in balance with nature and doing our fair share in meeting New Zealand's climate goals.

[1] For example, proposed changes to the National Policy Statement for Freshwater 2020 will very likely have emissions consequences.

Our Mission

We propose: To support the Tasman Region's climate response to the full extent of the Council's scope of activities and financial means.

Our principles for guiding action on climate change

We endorse the principles. We propose additions to two, and propose two more.

Be collaborative: given agricultural emissions are a large proportion of Tasman's emissions, we recommend specific reference in this principle to rural communities and sector groups.

Be equitable, fair and inclusive: we recommend adding *in Tasman and globally* at the end, to recognise that a just transition is not just a local phenomenon.

A recent paper reveals: If warming reaches or exceeds 2 °C this century, mainly richer humans will be responsible for killing roughly 1 billion mainly poorer humans through anthropogenic global warming. On the basis of their 1000 ton rule, current Nelson Tasman annual emissions (about 1 million tonnes CO2e) will result in about 300 mainly poorer persons around the globe prematurely dying over the next century.

Do our fair share *of the national task of climate response: at least 7% per annum for reduction of CO2 and other long-lived gases in our region and 1.5% per annum of biogenic methane (between 2024 and 2030).*

Based on the work of the NTCF Targets Group[2], we argue that in order to achieve New Zealand's fair share of the internationally-agreed climate goal to keep or return the planet to heating of no more than 1.5°C, and recognising the crucial significance of 2030 targets in reaching net zero by 2050 as identified in the recent IPCC reports, each region must do its fair share. We suggest this is best accomplished by adopting the same percentage annual emissions reduction of greenhouse gases as is necessary at the national level - approximately 1.5% per annum of biogenic methane and at least 7% per annum of CO2 and other long-lived gases (plus an allowance for population growth).

Setting 2030 targets makes the goals much easier to envisage within one's projected sphere of action than the far-off date of 2050. A 2050 target makes it dangerously easy to put off difficult action and hope that someone will do something in the future.

Some of this regional reduction will occur due to actions at the national level e.g. quotas on NZ units of emission in the ETS scheme, and some at community or business or household level. TDC's mission is seen as contributing all it can within its considerable capacity to accomplish the necessary annual emissions reduction and supporting other players to do their part.

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[2] Regional emissions targets – Explainer.

These targets may change, and will need to be recalculated year by year. The Targets Group is currently revising the emissions reduction target to incorporate new emissions data released in mid-April 2024. It is likely that the revised target will be higher due to insufficient reductions to date i.e. annual reductions greater than 7% will be needed.

Many other targets are currently under review[3]. It seems quite possible that targets set in legislation and elsewhere will be revised in future to be more in line with the ambitious targets the NTCF is proposing here.

The following principle adds to the imperative of ambitious emissions reductions.

Think global, act local. *We recognise the atmosphere is a global common and the future extent and consequences of climate change in our District are critically dependent on the climate actions of people and governments elsewhere on the globe, especially those in less developed countries.*

The impacts of greenhouse gas emissions are global, emissions decisions are local, and almost all decisions will not be made here.

We in Aotearoa New Zealand are (for the most part) relatively affluent. We contribute disproportionately (per capita) to current global emissions and have disproportionately contributed to historical emissions. Others disproportionately bear the consequences. Between 2010 and 2020, highly vulnerable regions, home to over 3.3 billion people, experienced 15 times

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[3] The CO2 and CH4 targets in the Climate Change Response (Zero Carbon) Amendment Act 2019 pre-date the IPCC AR6 findings, including the pivotal need for 43% net GHG reductions globally by 2030. The Climate Change Commission is currently consulting on Aotearoa New Zealand's 2050 emissions reduction target; changes in scientific understanding of climate change such as IPCC findings are a ground to recommend a change to the 2050 target. The Commission is advising New Zealand is now on track to reach net zero long-lived emissions by 2042.

The new Government has commissioned a review of the methane target.

New Zealand's first Nationally Determined Contribution (NDC) under the Paris Agreement, as updated on 31 October 2021, sets a headline target of a 50 per cent reduction of net emissions below our gross 2005 level by 2030. A decision is awaited from the Court of Appeal on a case brought by Lawyers for Climate Action New Zealand against the Climate Change Commission's advice to the Minister of Climate Change on the NDC.

Treasury's recent Ngā Kōrero Āhuarangi Me Te Ōhanga: Climate Economic and Fiscal Assessment 2023 report addresses the problematic need for paying for emissions reductions or removals overseas (offshore mitigation) to meet shortfalls in domestic emissions budgets and Emissions Reduction Plan targets in meeting our NDC,

The NTCF Targets Group is currently revising the emissions reduction target to incorporate new emissions data released in mid-April 2024. It is likely that the revised target will be higher, i.e. annual reductions greater than 7% will be needed.

higher human mortality rates from floods, droughts and storms compared to regions with very low vulnerability.[4]

Most of those people are in Africa, Latin America and Asia. These regions currently produce 62 per cent of global fossil fuel emissions and soon they will produce two-thirds. People in those regions will not reduce their emissions if we in developed countries refuse to do so. Thus, being seen to be doing our international fair share is not just a matter of climate justice but very much in our self-interest. Our principal leverage to mitigate the future consequences of climate change (think 2022 Nelson atmospheric river, Auckland floods, Cyclone Gabrielle) is to foster the goodwill of our fellow people across the globe by the commitment we show locally to rapidly reducing our emissions.

Key Outcomes

We endorse outcomes 3–5 and are particularly pleased that you emphasise leadership and a better-informed and empowered public.

We recommend outcomes 1 and 2 be integrated into one outcome for the mitigation component of the Plan, in line with our targets proposals (above):

Council and Tasman District rapidly and justly transition to a low emissions region within the society and economy of Aotearoa New Zealand: long-lived gases reduce to 43% below 2019 levels by 2030 and methane by 10%; net zero emissions by 2050.

We note three other target issues.

i. It has seemed possible up to this point to ignore the methane target when considering regional emissions action; the matter was in the hands of other players and apparently outside the realm of action of a District Council. However, the distressing fact is that neither the target nor an action plan to reach it has been agreed to between central government and farmers' organisations. If the targets for methane are lowered, the targets for long-lived gases will become higher, leaving a greater burden falling on the shoulders of others. This will affect Council plans. While agricultural emissions are difficult to deal with at regional level, we see it as important that the Council exercise leadership by frequent ongoing engagement with sector groups.

ii. Our targets work has so far focussed on the critical period between now and 2030. We note the Plan's existing long-lived GHG emissions reduction target of 34% by 2035 is substantially less than the recent AR6 Synthesis Report target for global CO2 emissions reductions of 65% [50-96%] by 2035.

Monitoring and Plan Review

[4] https://www.un.org/sustainabledevelopment/climate-change/

If we don't measure, we can't manage. The Plan currently has the annual GHG inventory as the metric for the Council's operational emissions. More important is to have a metric for the leverage the Council has through its regulatory and planning functions on Tasman District's overall emissions. As Timo Neubauer argues, the latter really needs to be the focus of the Plan.

We understand modelling is currently being developed by local authorities that enables different emissions reductions options to be quantified, and the effectiveness of actions then to be assessed against predictions. Through this process, theories are scrutinised, and judgments may shift. To help the public input and scrutinise the allocation of resources for climate action in Tasman, we request the ongoing results from such modelling be made publicly available once there is sufficient confidence in its methodology.

We request the publishing as soon as possible of the monthly fossil fuel sales statistics the Council already has; and showing emissions reductions in the next LTP alongside the financials for the options residents are being asked to choose amongst.

We see it as important that the Plan specifies intentions for periodic review and revision. We envisage this would occur in tandem with three yearly LTP processes, but it may also be appropriate if significant changes warrant it.

Nelson City Council is currently drafting their Climate Change Strategy. Given climate change risks are inextricably linked across both Councils, we recommend investigation of the possibility of a combined Strategy to inform the next LTP.

Strategy on a Page

This section collates the specific actions that Council is proposing to fund or support over the next ten years in the Tasman LTP. For our more detailed comments, see Tasman Climate Action Plan section below.

Key Outcome 1. We propose (for here and the corresponding part of Appendix 1): Council and Tasman District rapidly and justly transition to a low emissions region within the society and economy of Aotearoa New Zealand.

1 . **Targets** 1(a) and 1(b)

We suggest the first Note in APPENDIX 1 replace reference to the Emissions Reductions Plan with 'Climate Change Response (Zero Carbon) Amendment Act 2019'. This will help readers relate these two targets to current reviews by the Government and Climate Change Commission.

We propose for Target 1(c): Net emissions of long-lived greenhouse gases from the operational Council's activities reduce 43% by 2030 and 65% by 2035, compared to the 2020/21 baseline.

We propose for the second Note: Target 1(c) specifies targets for Council's and Tasman's emissions for intervening years (these align with percentage reductions

identified by the IPCC as the minimum necessary to reach net zero emissions by 2050 while keeping temperature rises as low as possible).

3. **Leadership**. We commend you for including the concept of Just Transition and intending to ensure that no inequalities are exacerbated.

We believe it is important to go further than this. If we are serious about transformative action, and we include cutting consumption-based emissions, it is certain that some businesses will suffer a decline in sales (while other businesses will come into existence). We need to know that someone, perhaps in the Council or in the regional development association, is taking responsibility for keeping an eye on these necessary changes, and will be ready to apply the knowledge we have accumulated in the area of Just Transition e.g. studies by the Ministry of Business, Innovation and Employment.

Furthermore, if we understand that inequality is a barrier to households taking climate action and building resilience to climate-related events, we could strive further to expand Council's repertoire of measures to level inequality.

4. **Information**.We commend you for making it one of your four main arenas of action. Because we now know information is a poor catalyst for effective climate action, we recommend widening the scope to 'Information and Empowering'.

We are happy that you envisage collaborating with us: we have benefitted greatly from our collaboration so far. We have contributed several projects in Tasman in this category of action and have more to offer. We think it is fair and appropriate to ask TDC to make some financial contribution to NTCF and make a detailed request in our LTP submission.

Tasman Climate Action Plan

This section contains all actions in the Tasman Climate Action Plan: short-term (2024 — 2027); medium-term (2027 — 2030); and long-term (2030+).

Numerous items in the Action Plan are unfunded, including all in outcomes 3 and 4 – Leadership and Information. The latter are allocated staff time, and it is possible other zero-funded items will be funded from other budgets. It is vital the Plan clearly states which items will proceed (and their constraints) and which are not funded at all.

MITIGATION

- It is notable that agricultural emissions are not mentioned. The level of reduction or stasis in agricultural emissions is of concern to all of us, as mentioned above.

- Short-term actions

1(iv) Investigate the feasibility of switching to refrigerants with a lower emissions impact Richmond Aquatic Centre and other Council owned facilities.
We welcome attention to refrigerants because of their very high Global Warming Potentials. According to Cool Safe, currently only 8% of recoverable synthetic refrigerants are properly recovered in NZ.

Is there evidence this leakage can't be addressed through maintenance? If yes, we recommend replacement be given very high priority. If not, any proposal needs to calculate the embedded total emissions in replacing equipment that may not be at their end of life.

The Waste Management and Minimisation Activity Management Plan 2024-2034 notes a national scheme for refrigerants is being developed. We request the Council advocate for this to be completed expeditiously.

We understand NCC engages a contractor to capture refrigerants at its Tahunanui Waste Recovery Centre. We request the Council, if not already doing so, give very high priority to instituting refrigerant recovery at its resource recovery centres.

1 (vi) Develop a solar/renewable energy investment policy.
This is a very good idea, and will enhance resilience as well as mitigation.

1 (vii) Update Council's Procurement Policy
We're happy with your intentions on the procurement policy and eager to see this implemented as soon as possible. We commend the inclusion of the four well-beings and the SDGs in the policy.

(ix) We propose TDC develop and implement an urban greening policy, as NCC has developed. This would sequester carbon and have numerous other benefits. Planting up open areas of parks and reserves that aren't significantly used by residents (e.g. parts of Saxton Field) would avoid using fossil fuels to mow these and reduce Council costs.

(x) Undertake bi-annual inventory of Tasman District's greenhouse gas emissions, model projected emissions and work with others to identify actions for reducing our collective community carbon footprint.
We warmly welcome this.

- ERP target: All municipal landfills must capture gas by the end of 2026.
  We congratulate TDC (and NCC) on improving the system to capture methane from the joint landfill at York Valley. We also note that a methane capture system is installed at the currently closed landfill at Eves Valley, which is an improvement on the ERP target.

Closed landfills were excluded from the target, but we believe they should not have been.

- ERP target: 40% reduction of biogenic methane (from landfills) by 2035.
  (ii) Implement the Joint Waste Management and Minimisation Plan to reduce total waste to landfill by 10% per capita by 2030 (e.g., promotion of circular economy, education, service changes etc).
  We believe this target is insufficient to meet this and other ERP targets. We request TDC work with NCC to ensure that the work on a new Joint Waste Management and Minimisation Plan includes a target to move towards zero waste in the region and to exceed all ERPs targets. We need to stop producing waste; it's not enough to just divert some of it from landfill.

  How does the $4.79 million Solid Waste AMP item in the Plan correlate with budget line items at Appendix E in the 2024-2034 draft Waste Management and Minimisation Activity Management Plan?

- ERP target: Prohibit organic waste disposal in landfills by 2030.
  (ii) Plan for all organic waste to be diverted from landfill by 2030.
  We applaud this target and the work planned to meet it. We hope the Council, with NCC, has included a requirement in the business case for dealing with food waste to consider the social and environmental benefits, as well as economic benefits of a distributed system of processing of organic materials. A system that supports the diversion and processing throughout the region would allow the nutrients of any food waste to be put back into the soils of each community, and generate local employment. It would also reduce transport emissions from delivery of organics to one central processing site. The solutions for each community could be developed to fit the needs of that community. We believe this option should be considered in the business case.

  We also applaud the work to divert construction waste from landfill. We would like the work being led by NCC to reduce the generation of construction waste being given a higher priority (it's not mentioned in the Plan). The reduction in generation of waste will have a much greater impact on the reduction of emissions, the cost of building and the lifetime costs of the building if built to high insulation standards.

- ERP Transport Emissions. Public transport target: The percentage of all urban populations in the District who take public transport to work or school increases to 2% by 2035 and to 4% by 2050 (as at 2022, 1% use public transport).
  From 1% to 2% by 2035 and to 4% by 2050 seems excessively modest. We need to aim considerably higher to achieve a sufficient reduction of transport emissions.

- Active Transport Target
  Studies strongly support the benefits of shifting from fossil-fuel emitting forms of transport. The health and air pollution in New Zealand 2016 study estimated the social

costs of PM2.5 pollution motor vehicles at $1.04 billion, and the costs of NO2 pollution from anthropogenic sources (assumed to result from motor vehicles alone) as $9.5 billion. Total costs of fossil-fuelled transport thus were $10.5 billion. A study of New Plymouth and Hastings active travel programmes found that concerted investment is likely to produce measurable, positive returns. They found an estimated benefit/cost ratio of 11:1 for these two cities (using a discount rate of 3.5%).

The targets look appropriate. We request a 2030 target.

We believe that it will take investment in a full-time staff member to accomplish them. This person would work on School Travel Plans with individual schools, Work Travel Plans with individual businesses (in collaboration with Businesses for Climate Action), and with other community groups. Such work could begin with the Council itself, perhaps beginning with Workride as is occurring in Nelson City Council, and expanding to a work travel plan for all council employees. We understand that TDC already has a high rate of councillors and employees using bikes to commute - an excellent base on which to build. Such an initiative would certainly show leadership in this area.

(ii) Encourage increased use of active transport networks, focusing on walking or cycling to work or school in urban areas.
We suggest working together with users of these networks to co-design new facilities.

(iii) Create and implement a joint speed management plan for Nelson-Tasman
We are in favour of a speed management plan that prioritises pedestrians' and cyclists' safety. We have submitted on the speed limits consultation.

A glaring omission from the Plan is the development of separated cycleways in the short-term action period of 2024-2026. It is deferred until 2027-2030. This is not acceptable. We understand that this may be related to central government funding being withdrawn from this area. We wish to convey how unsatisfactory this is, especially for commuting cyclists. We know that this is a major factor inhibiting people from substituting active transport for car use. Extension of cycleways is essential to reducing transport emissions.

We request TDC lobbies central government to continue to fund footpaths from the roading budget, and not transfer the costs to the Active Transport budget as they apparently plan to do.

- No net increase in vehicle kilometres travelled (vkt) by 2050
  This seems extremely modest, despite the population increase. Tasman's vkt per capita is one of the highest in the world. We should prioritise significant urgent reductions in this measure, setting a 2030 target. Ride-sharing and disincentives for single occupancy should be part of the Plan. We need a good app, broader than for just this region, to support ride-sharing.

- ERP targets:
  Reduce transport emissions by 41% by 2035 and to net zero by 2050.
  Increase zero-emissions vehicles to 30% of the light fleet by 2035.

  The effectiveness of measures to achieve mode shift in transport have been well-researched. A meta-analysis[5] of 800 European data-sets shows the following rank order of effectiveness in reducing the number of cars in cities:
  1. Congestion charges
  2. Parking and traffic controls
  3. Limited traffic zones
  4. Mobility services for commuters
  5. Workplace parking charges
  6. Workplace travel planning
  7. University travel planning
  8. Mobility services for universities
  9. Car sharing
  10. School travel planning
  11. Personalised travel plans
  12. Apps for sustainable mobility

  Tasman is not Europe and reducing car use in cities is not our only transport challenge. However, some of these measures are entirely applicable to our setting. When full costs of transport modes are taken into account, mode shift looks highly cost effective. Copenhagen, for example, has calculated that whereas each kilometre cycled benefits society to the tune of €0.64, each kilometre driven incurs a net loss of -€0.71, when impacts on individual wellbeing (physical and mental health, accidents, traffic) and the environment (climate, air and noise pollution) are accounted for. So each kilometre travelled where a car is replaced by a bicycle generates €1.35 of social benefits – of which only a few cents would be saved by switching from a fossil-fuelled to an electric-powered car, according to this analysis[6].

  Bikes in Schools is another scheme that could contribute to this target. The school purchases a fleet of bikes which are lent to students.

  An E-Bike 'Library' (rental facility), including cargo-bikes may be a useful initiative. Waka Kotahi has funded such a facility, in collaboration with the Council in Whakatane.

  (iii) Encourage providers to increase the network and capacity of zero-emissions infrastructure across the District.

[5] https://theconversation.com/12-best-ways-to-get-cars-out-of-cities-ranked-by-new-research-180642

[6] https://cyclingsolutions.info/cost-benefit-of-cycling-infrastructure/

Fast chargers are needed at Springs Junction, Collingwood and St. Arnaud. More chargers are needed in Motueka and Murchison.

- ERP goals on built infrastructure
  1(d) Council decisions for planning and infrastructure design supports private individuals and businesses to reduce their emissions to near zero by 2050 and build climate-resilience.
  We support all elements of this section, but are concerned there is no funding attached.

  We take the view that all new infrastructure proposals should involve calculation of carbon emissions footprint and should relate to the emissions budget for the region. That is, there may be emissions constraints on what infrastructure can be built. Clearly this would incentivise planning for low emissions construction.

  We note the emphasis on urban intensification when speaking of implementing the Future Development Strategy. We endorse this and wish to be clear about our strong views on the folly of greenfield development. It will lock in future expenses for infrastructure maintenance for the Council permanently, and make almost irreversible increases in transport emissions. It will reduce peri-urban arable land and/or access to Nature. To quote local architect, Timo Neubauer, 'Looking at our Future Development Strategy, they are condoning and actively facilitating carbon inducing urban sprawl even though international research is clear that the per capita life-cycle GHG emissions of well-designed, higher density urban neighbourhoods would be up to 2.5 times lower'.

  We think this part of the Plan needs to further include how the development of the Tasman Environment Plan and the revised Regional Policy Statement will address emissions reductions.

  We commend to you the Greater Wellington RC revised draft RPS as an example of breadth and ambition in bringing climate considerations into the planning process.

ADAPTATION

- 2 (a) (i) Council's policy statements, strategies and plans developed and implemented under the resource management system and Local Government Act.
  2 (a) (ii) Building regulation and resource consent.
  We are concerned that TDC documents may not be up to date on sea level rise and subsidence projections. For instance, recent Satsense research has found a relative sea rise rate (i.e. including land subsidence) at Nelson Airport of 3.4 mm/year, compared with the NZ Sea Rise estimate of 1.98 mm/yr just two years earlier.

  We fear your figures for ground and floor levels are set too low in the light of expecting a house to be usable for 100 years. Tasman has such extensive coast and flood plain area

that it is important to make conservative projections to protect infrastructure for the future.

We recommend the Plan include provision for establishing the costs and financial implications of responding to sea rise. Further, the Council seeks to work with other local authorities to identify areas that are likely to be subject to insurance retreat from sea rise (and other risks), as has already been done for major metropolitan areas.

2(a)(iv) Development of a regional adaptation strategy.
This was praised as 'excellent and very brave' by our members.
It should include planning for drought and wildfire conditions: practice of water frugality and obligatory household rainwater tanks with associated purification systems. We suggest considering a scheme of bulk purchase of rainwater tanks to enable lower cost household purchase.
For some areas community-led retreat may need to be included in the strategies.

2(c) Ecological adaptation.
We are pleased with and supportive of your planning in this section. We welcome the creation of green infrastructure in rural areas.

We recommend this section acknowledge the new Waimea Inlet Strategy and Action Plan as a model for planning for ecological retreat of natural coastal habitats in response to sea rise.

LEADERSHIP

- 3 (a) (v) Collaborate with others on opportunities to secure external funding for climate change initiatives, including from international funding sources.
  We strongly support this.

- 3(b)(i) Assumptions about climate change.
  We recommend including guidance from NIWA on this matter, alongside IPCC and MfE, because of the above-mentioned matter of continual development of data.

- 3(b)(v) Climate change dashboard
  We are very pleased that this has been incorporated into the plan. We imagine you are working with NCC on this. We think there should be a budget line for this.

- 3(d)(i) Advocate to central government.
  We agree that the Council needs to advocate to central government for climate action funding. We encourage you to advocate to central government on the following matters:
  - Ensure funding for footpaths comes out of roading budgets, not active transport budgets.

    - Restore incentivisation of low emissions car purchases and disincentivisation of high emissions car purchases.
    - Funding for separated cycleways.

- 3(d)(ii) Identify key partnership opportunities broadly and in relation to more specific action categories
  - Given the high level of agricultural emissions, we recommend rural communities and sector groups be included within this item.

- 3(d)(vi) Council collaboration with community organisations
  - We experience council staff as highly collaborative and are pleased that this is an element in the Plan.

- 3(e)(ii) Take the Jump
  - We're delighted that you have included the idea of staff participation in TTJ in your action plan.

- 3(f) Council reporting on implementation
  We strongly endorse this, and note the wish to develop further metrics for this purpose. We recommend you consider measures of wellbeing, such as were being developed in the Treasury Department in recent years. A small amount of work was done under the aegis of the Intergenerational Strategy on adapting this for regional purposes in Nelson Tasman. The shifts we must make to hold global warming within liveable limits are transformational in scale. GDP, which correlates very poorly with wellbeing, may well diminish. It is possible that wellbeing may increase, due to many co-benefits of low emissions living. The metrics we use will be of great importance.

  We request you notify posting of annual and semi-quarterly implementation updates on the Council's Climate Action Plan web page through the monthly Newsline.

- Further suggestion for leadership in disaster preparedness
  Disaster response involves multiple players, including hundreds of volunteer actions by those on the ground. During Cyclone Gabrielle an online system emerged under the name of East Coast Exchange to encourage, recognise and channel funds to hundreds of volunteer efforts towards survival and recovery. We recommend that TDC creates the capacity to operationalise such a system in the event of a disaster.

  The particular values, skills and assets of marae in disaster response are evident, and should be incorporated into planning.

  Marae and other suitable sites should store caches of supplies for emergency response.

INFORMATION AND EMPOWERMENT

- Given its importance, this area will need a budget and cannot be effectively resourced through staff time alone.

- We recommend that the Council actively seek to address disinformation on climate change.

- 4(a)(iii) Update Council's website with relevant and up-to- date information on the local impacts of climate change and the Council's responses to climate change.
  We request Council keep a focus on our horticultural and agricultural industries. These can easily go under the radar yet rural communities are on the front lines of climate change.

- 4(c) Council collaborates with the Nelson Tasman Climate Forum to engage with and inform Tasman residents about climate change actions and options, across a broad spectrum of interests.
  We are pleased that you specifically refer to collaboration with NTCF. We believe we have assets in this area for a fruitful collaboration.
  We hope the Council can provide some modest financial assistance to support this. We acknowledge the hard financial sustainability choices Tasman people are currently facing. We make our request in our LTP submission, including for our Take the Jump behaviour change programme.

- Some areas of needed information and skills provision:
  - Practices of water frugality, equipping and using roof rainwater.
  - Practices of food security: promoting food growing at home/marae, including seed swaps, continuing your composting workshops.
  - Climate-friendly diet - growing, buying, storing, preserving, cooking, minimising waste, for climate, health and soil benefits.
  - Energy frugality - lowering demand, raising efficiency.
  - Bicycle choice and maintenance.

  Support through community grants and collaboration with some of the groups specialising in the above climate-relevant practices will strengthen this work.

APPENDIX 2

We are seriously concerned that much of the climate risk information in Appendix 2 is dated, being based on IPCC AR5. We are concerned also that this information seems to be repeated in Activity Management Plans. This needs to be updated to AR6 findings, and to recognise that climate change appears to be occurring faster, with more damaging impacts, than scientists previously understood. For instance, it is possible that the IPCC has underestimated Earth's climate sensitivity and that global temperature rise will exceed 1.5°C in the 2020s and 2°C before 2050.

The submission of the NTCF Nature and Climate Group addresses this in greater detail. Possibly, parts of the climate risk section in the TDC Forecasting Assumptions Tasman's 10-Year Plan 2024-2034 could be incorporated.

TECHNICALITIES

A few things that would enhance the Plan as a public document:

Setting the Scene

- The Climate Change Response Act requires us … We think this requirement is derived from the Resource Management Amendment Act 2020.

APPENDIX 2: Update: Under our Nationally Determined Contribution (NDC) submitted towards our Paris Agreement commitment, updated in 2021, Aotearoa New Zealand has a headline target of a 50 per cent reduction of net emissions below our gross 2005 level by 2030.

There seems to be confusion on the meanings of bi-annual and biennial.

CONCLUSION

We congratulate you on a good plan. We hope our contributions might make it even better. We look forward to working with you in the years ahead towards realising the goals we share.

We would like to be heard in support of this submission. Please contact us at coordinator@ntcf.nz or joanna.santabarbara43@gmail.com.

Yours sincerely,
Joanna Santa Barbara
Co-Chair, Nelson Tasman Climate Forum