

Submission by

Hamilton City Council

THE CLIMATE CHANGE COMMISSION'S 2021 DRAFT ADVICE AND SUPPORTING EVIDENCE TO GOVERNMENT

26 March 2021

1.0 SUMMARY OF HCC'S KEY POINTS AND RECOMMENDATIONS

- 1.1 Although HCC supports the overall intent and direction of the Climate Change Commission's **2021 Draft Advice and Supporting Evidence to Government**, the recommendations do not fully acknowledge and address the transformation that is required in businesses, communities and government to address climate change.
- 1.2 There should be a stronger focus on the social, economic and cultural transformations that are required in the transition to net zero emissions.
- 1.3 HCC is supportive of the vision and the analytical framework the Commission presents in the draft advice and evidence document. However, the importance of environment and nature-based solutions are not well reflected throughout the advice.
- 1.4 HCC is supportive of the production-based approach being used for the setting of emissions budgets but is not supportive of this limiting the thinking around the long-term transitions and systems changes required.
- 1.5 The current uncertainty around land transport funding from Waka Kotahi is very concerning for HCC and other councils throughout the country. Achieving mode shift towards more sustainable transport options (such as walking, cycling and public transport), as required to meet Government policy direction on climate change, land transport and the Climate Change Commission's draft advice, will not be realised unless adequate and definitive funding is established for key land transport activities.
- 1.6 HCC recommend that the Commission strengthen recommendations around both urban form and mode shift, to better address the interdependencies and the importance in the urban response to climate change.
- 1.7 Although local government has a key role in the delivery of many of the emissions reduction policies, funding challenges will limit the ability for councils to deliver these initiatives.
- 1.8 Local government must be supported with appropriate funding and guidance for the implementation of new policies and legislation.

2.0 INTRODUCTION

- 2.1 Hamilton City Council (HCC) supports the overall intent and direction of the Climate Change Commission's **2021 Draft Advice and Supporting Evidence to Government** (referred to as the draft advice).
- 2.2 The draft advice covers a broad range of issues relating to emissions reductions. This

submission is based on our areas of expertise, our core functions and our purpose of improving the wellbeing of our community. We have responded directly to the relevant consultation questions included in the draft advice in **Appendix 1**.

- 2.3 HCC has an ongoing interest in New Zealand's climate change response and has submitted on many policies, plans and Bills that relate to climate change. All our submissions are available [online](#). Key points from a selection of HCC submissions that are relevant to this submission are included in **Appendix 2**.

3.0 THE NEED FOR TRANSFORMATION

- 3.1 HCC acknowledge that the Climate Change Commission must meet the requirements of 5ZA and 5ZC of the Climate Change Response Act 2002 when providing their draft advice. However, the approach taken appears to have resulted in a narrow focus on the measures required to achieve the emissions budgets. Whilst HCC is supportive of using the production-based approach for setting the emissions budgets, this should not limit the thinking around the transformation required for the longer-term transition to net zero emissions.
- 3.2 The focus on production-based emissions also means that the discussion on the need for changes to our lifestyle, that all form part of the response, are not well reflected in the recommendations. The changes to our economy and social values, that are already happening and will continue into the future, need to be articulated. For example, as our response to COVID has shown we are able to adjust to new ways of working.
- 3.3 At HCC we introduced 'Flexible by choice - a new way of working', the implementation was sped up in response to COVID-19. This approach has challenged the norms of the way we work and demonstrated that we can be adaptable in the way we deliver for our community. Initiatives like this across New Zealand have the potential to challenge the norms around work and to reduce emissions associated with commuting.
- 3.4 The sharing economy is another example of an approach that should be promoted and recognised for the role it can play in reducing emissions associated with consumption. In the draft advice car sharing is acknowledged in relation to an equitable transition, however more discussion and reference on how the sharing economy can unlock emissions reductions should be provided.
- 3.5 Whilst HCC support the intent and direction of the draft advice, the Climate Change Commission's recommendations do not fully acknowledge and address the transformation that is required in businesses, communities and government to address climate change.

4.0 RE-FRAMING THE CLIMATE CHANGE RESPONSE

- 4.1 The benefits of various economic projects do not always reflect the actual costs such projects have on the environment¹. This has resulted in some of the global challenges we are currently facing, including biodiversity decline and climate change.
- 4.2 The Commission's analytical framework includes ecology/environment as one of four systems that are considered in the advice, which HCC strongly supports. However, in our reading of the draft advice and the priority actions identified, especially around transport and waste, this is not well reflected.
- 4.3 HCC recently adopted a [Nature in the City Strategy 2020-2050](#). In the strategy HCC acknowledges that over time the native vegetation cover has been reduced to 2% and that we need to increase this cover to 10% for our biodiversity to thrive. In the strategy we articulate

¹ Final Report - The Economics of Biodiversity: The Dasgupta Review – HM Treasury (February 2021).
Making Peace with Nature - A scientific blueprint to tackle the climate, biodiversity and pollution emergencies – United Nations Environment Programme (February 2021).

the importance of this biodiversity for both climate change mitigation and adaptation.

- 4.4 HCC would support a greater focus on nature-based solutions and further embedding of nature in the draft advice, including the role of urban reforestation as carbon sinks.

5.0 TRANSPORT - INCREASED FOCUS ON MODE SHIFT

- 5.1 HCC is supportive of the strong action in the transport sector and notes that there are significant opportunities for reducing emissions in the short-term, whilst unlocking longer-term emissions reductions.
- 5.2 The draft advice is weak on the role of mode shift in reducing transport emissions and the need for urban form to enable the increase in active and public transport use. Whilst electric vehicles are an important part of reducing transport emissions, the Commission needs to provide more direction on how the Government should increase the uptake of public transport, active transport and car sharing.
- 5.3 The Commission recommends *“develop an integrated national transport network to reduce travel by private vehicles and increase walking, cycling, low emissions public and shared transport”* as a necessary action. HCC suggest that this is a time-critical action.
- 5.4 The assumptions in the draft advice on increasing walking, cycling and public transport by 25%, 95% and 120% respectively by 2030 should be separated out to reflect the difference in urban and rural settings. HCC also supports targets being included for mode shift in the recommendations to Government, similar to the targets recommended for electric vehicles and renewable energy.
- 5.5 One of the key transformational moves identified in the Hamilton-Waikato Metro Spatial Plan is *“A radical transport shift - a multi-modal transport network connecting the metro area and facilitating a radical shift to using public transport through the establishment of a rapid and frequent public transport network shaped around where and how communities will grow”*. This is the change required to reduce emissions through transport planning and urban form.
- 5.6 Hamilton has the highest car trip use in the whole of New Zealand at 86%. HCC has put in place a number of plans to increase the uptake of active transport and public transport. These include the [Hamilton-Waikato Metro Spatial Plan](#), Access Hamilton, Biking Plan and in collaboration with Waka Kotahi has developed the [Hamilton - Waikato Metro Area Mode Shift Plan](#). However, as articulated in the Commission's advice, the funding for mode shift projects is very limited i.e. page 106 of the Commission's report notes that *“Decades of underinvestment in infrastructure and services for public transport, walking and cycling have often made these travel choices slower, less reliable and ultimately less attractive than travelling by private vehicle. Transport planning and funding is largely centered around private vehicle use. Of the approximately \$4 billion spent on land transport in 2017, only around \$600 million was spent on public transport and less than \$100 million on walking and cycling. This may improve based on the strategic direction set out for transport in the new Government Policy Statement on Land Transport 2021 but there should be a large increase funding spent on public and active mobility, including for the national public transport network”*.
- 5.7 The Government clearly needs to start investing more significantly in mode shift opportunities.
- 5.8 HCC, in its 15 May 2020 submission to the Draft Government Policy Statement on Land Transport 2021/22-2030/31 (refer [here](#)), noted that:
- *HCC strongly support the Strategic Priorities and in particular Safety and Better Travel Options. HCC is concerned that the amount of funding allocated to the Walking and Cycling Improvements activity class is inadequate and does not align with the strategic direction of the draft GPS, including supporting better travel choices. The current draft proposes*

allocating approximately 2 percent of funding to walking and cycling. Consideration needs to be given to significantly increasing the share of the transport budget that is allocated to Walking and Cycling Improvements. Without a step change in the way the transport budget allocated, it is unlikely that cities such as Hamilton will be able to achieve significant mode shift without implementation of large-scale and intergenerational projects.

- *HCC further notes that increasing the Funding Assistance Rates for Walking and Cycling Improvements would both encourage and assist cities to invest in mode shift. HCC asks that the Ministry of Transport and Waka Kotahi NZ Transport Agency give consideration to increasing Funding Assistance Rates for walking and cycling projects and ensure that the GPS funding allocation accounts for this.*

5.9 In response to Waka Kotahi's Investment Proposal 2021-2031, Hamilton Mayor Paula Southgate wrote to the Ministers for Transport, Environment, Climate Change and Finance outlining the opportunity for Hamilton to be a pilot for a transformative transportation approach. With the right funding approach from Government we could implement a comprehensive mode shift programme, significantly reducing Hamilton's emissions and piloting actions for other cities to learn from.

5.10 Waka Kotahi has recently outlined that they are not currently approving funding for any new delivery projects in the 2021-24 National Land Transport Plan. Furthermore, in regard to decarbonising land transport, Waka Kotahi note that:

- It is a significant challenge for us all.
- We need to work together to make the shift - this is difficult in the current environment with our joint funding constraints.
- How we purchase, or fund activities is still unclear.
- How we need to adapt our programmes to meet the outcomes still needs to be considered.
- Our current NLTP activities may not significantly change our carbon profiles - we may need to revisit these during the next three years.

5.11 The current uncertainty around land transport funding from Waka Kotahi is very concerning for HCC and other councils throughout the country. Achieving mode shift towards more sustainable transport options (such as walking, cycling and public transport), as required to meet Government policy direction on climate change, land transport and the Climate Change Commission's draft advice, will not be realised unless adequate and definitive funding is established for key land transport activities.

6.0 IMPORTANCE OF URBAN FORM IN ENABLING LOW CARBON LIFESTYLES

6.1 HCC is very supportive of the vision in the draft advice *"Where urban form encourages cycling and walking, alongside efficient, affordable and interconnected public transport networks."* However, HCC view the recommendations to Government around urban form as weak.

6.2 We are supportive of a consistent approach to quantifying the emissions impact of urban development decisions. However, councils require more direction in the short-term as we will be making amendments to District Plans and growth decisions in the coming years and these opportunities to develop low emissions communities will be lost.

6.3 The concept of the 20-minute City has been linked to creating communities where residents don't have to travel further than 20 minutes to access work, shops, parks, and community facilities. By creating 20-minute Cities we will not be locking our community into high-carbon, high-cost living.

6.4 HCC recommend the Commission strengthen recommendations on urban form to reflect the immediate need from local government in this area.

7.0 ROLE OF LOCAL GOVERNMENT

7.1 There are many recommendations in the draft advice that will require local government implementation. HCC is supportive of enabling Recommendation 4 made in the draft advice. Both alignment across the legislation and policy and funding is critical for local government to be able to implement Government policy direction.

7.2 HCC recommends that an additional point be added to the recommendation on improved guidance to local government on the implementation of policy and legislation. Consistent application of policy and legislation will reduce costs to councils and ensure that they are aligned across Aotearoa.

7.3 In our submission on the Climate Change Response (Zero Carbon) Amendment Bill we outlined *“Local government needs to be provided with guidance, tools and resources to enable it to meaningfully contribute to emissions reductions, and deliver adaptation action at the local level, where it is best-suited to take place. This recognises that the effects of climate change are by definition local and will vary from place to place.”*

7.4 In the 2021-2031 Draft Long Term Plan, HCC has included a new targeted Government compliance rate that will collect \$9.6 million in the first year and is the equivalent of 4.5% average rates increase. This targeted rate is due to the changes in Government policy, which includes the National Policy Statement on Urban Development and three waters reform. These costs must be met by our ratepayers. HCC recommends that appropriate funding allocation is provided for the implementation of climate change policies and projects at the local scale.

8.0 FURTHER INFORMATION AND OPPORTUNITY TO DISCUSS OUR SUBMISSION

8.1 Should the Climate Change Commission require clarification of Hamilton City Council’s submission, or additional information, please contact Charlotte Catmur (Sustainability and Environment Advisor) on 07 838 6538 or email charlotte.catmur@hcc.govt.nz in the first instance.

8.2 Hamilton City Council would welcome the opportunity to discuss the content of our submission with the Climate Change Commission in more detail.

Yours faithfully



Richard Briggs
CHIEF EXECUTIVE

APPENDIX 1 - HCC'S RESPONSE TO THE CONSULTATION QUESTIONS

CONSULTATION QUESTION	OUR VIEWS AND RESPONSES
<p>1. Do you support the principles we have used to guide our analysis? Is there anything we should change, and why?</p>	<p>Support the principles.</p> <p>Ensuring the transition is fair and equitable and addresses existing inequalities is key to the long-term wellbeing of our community.</p> <p>These principles are also useful for councils, communities and businesses to use to guide their climate change response.</p>
<p>2. Do you support budget recommendation 1? Is there anything we should change, and why?</p>	<p>Support the budget recommendation.</p>
<p>3. 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?</p>	<p>Support the breakdown of the emissions budgets.</p> <p>The breakdown of the budgets helps the understanding of where the emissions reduction will be needed and when.</p> <p>It would be helpful to understand the sensitivity of the budgets to key industry closures and changes e.g. Smelter and Methanex and to better clarify the importance of these in relation to the budgets.</p>
<p><i>Limit on offshore mitigation for emissions budgets and circumstances justifying its use.</i></p> <p>4. Do you support budget recommendation 4? Is there anything we should change, and why?</p>	<p>Support recommendation 4 for the first three emissions reduction budgets.</p> <p>Whilst global emissions must be reduced to mitigate additional climate change, we should be focused on our domestic emissions and ensuring our economy and society are transitioning to a low-carbon future.</p> <p>We are supportive of this being reviewed for the fourth budget, including whether a trigger price for carbon reduction could be used to justify the use of emissions reductions from overseas which would prevent a severe economic impact in New Zealand.</p>
<p><i>Cross-party support for emissions budget.</i></p> <p>5. Do you support enabling recommendation 1? Is there anything we should change, and why?</p>	<p>Strongly support enabling recommendation 1.</p> <p>For local government certainty on the level of change required and the support from Central Government will be critical for delivering the emissions reductions required whilst meeting our purpose to improve community wellbeing.</p>

CONSULTATION QUESTION	OUR VIEWS AND RESPONSES
<p><i>Coordinate efforts to address climate change across Government.</i></p> <p>6. Do you support enabling recommendation 2? Is there anything we should change, and why?</p>	<p>Strongly support the need for a coordinated approach across Government.</p> <p>The responsibility for climate change must sit across all Government agencies and be embedded into all policy development. The risk of inconsistent policies being developed must be minimised.</p> <p>HCC support the emissions reduction plans providing policies and strategies for more than just the first emissions reduction budgets. Ideally this should be for the first three budgets as this will provide greater level of certainty for local government as we undertake our long-term and infrastructure planning.</p> <p>Support the need for agencies to receive dedicated funding to meet the needs of implementation of Emissions Reduction Plans.</p> <p>HCC would recommend that the Emissions Reduction Plans should include costs of implementation for the first budget.</p>
<p><i>Genuine, active and enduring partnership with iwi/Māori.</i></p> <p>7. Do you support enabling recommendation 3? Is there anything we should change, and why?</p>	<p>Support recommendation 3.</p> <p>HCC is strongly supportive of genuine partnership with iwi/Māori. HCC has recently consulted on our draft strategy - He Pou Manawa Ora - Pillars of Wellbeing. The four pillars are:</p> <ol style="list-style-type: none"> 1. He Pou Manawa Koorero - Pillar of history. 2. He Pou Toorangapuu Māori - Pillar of unity. 3. He Pou Manawa Taurikura - Pillar of prosperity. 4. He Pou Manawa Taiao - Pillar of restoration. <p>Under the Pillar of Restoration, HCC outline outcomes sought from the strategy, including:</p> <ul style="list-style-type: none"> • Agreed climate change strategy with iwi, mana whenua and maataa waaka. • Increased application of Maatauranga Māori (Māori knowledge) to develop environmental enhancement solutions and mitigations to infrastructure growth challenges. • Increased co-management arrangements with iwi and mana whenua to deliver best environmental practices and results.
<p><i>Central and local government working in partnership.</i></p> <p>8. Do you support enabling recommendation 4? Is there anything we should change, and why?</p>	<p>Support the intent of this recommendation.</p> <p>HCC strongly agree with the need to align legislation and policy to enable effective decisions.</p> <p>HCC recommend that the recommendation is strengthened to recognise that effective policy implementation is critical to delivering the climate change outcomes. Central government in partnership with local government needs to develop and provide consistent guidance and tools for local government to implement</p>

CONSULTATION QUESTION	OUR VIEWS AND RESPONSES
	<p>existing and future policy and legislation.</p> <p>The funding and financing mechanisms are essential for local government to be able to effectively implement the policies required to reduce emissions. Central Government must avoid passing on unfunded mandates to local government.</p> <p>The establishment of a genuine partnership is critical to the implementation of climate change policies. The role of local government in delivering the emissions reduction plans should be included in the plans delivered by the end of 2021. The alignment and funding on how they will be met should also be included in the emissions reduction plans. The 31 December 2022 is too late for the work plan to be published, given everything that must be delivered over the next two years. For example, HCC will be notifying our District Plan by August 2022 in response to the National Policy Statement on Urban Development and developing our Climate Change Strategy.</p>
<p><i>Establish processes for incorporating the views of all New Zealanders.</i></p> <p>9. Do you support enabling recommendation 5? Is there anything we should change, and why?</p>	<p>Partially support recommendation 5.</p> <p>HCC support ongoing and genuine engagement with the community on climate change. In the short-term the focus should be on educating the community around climate change.</p> <p>Any processes established should take into consideration how all New Zealanders can be involved, irrespective of location or age. Rural communities and smaller urban centres need to be able to engage.</p> <p>HCC suggest that the partnership with local government can also be leveraged as part of engaging with our communities. HCC has been trialing new ways to engage with our community through in-person and online methods.</p>
<p>Locking in net zero.</p> <p>10. Do you support our approach to focus on decarbonising sources of long-lived gas emissions where possible?</p>	<p>Support the approach.</p> <p>Support the approach to focus on decarbonising sources of long-lived gas emissions whilst balancing the transition to avoid future burden and not increasing inequality.</p>
<p>Locking in net zero.</p> <p>11. Do you support our approach to focus on growing new native forests to create a long-lived source of carbon removals?</p>	<p>Support the role of forestry.</p> <p>Supportive of the increased focus on permanent native forests on less productive land for their role in carbon removal as well as their role in supporting the ecological resilience required in response to climate change.</p>

CONSULTATION QUESTION	OUR VIEWS AND RESPONSES
<p><i>Our path to meeting the budgets.</i></p> <p>12. Do you support the overall path that we have proposed to meet the first three budgets?</p>	<p>Generally supportive of the overall pathway to meet the first three budgets.</p> <p>Comments are provided in the relevant sector responses on the proposed recommendations to achieve the budgets.</p>
<p><i>An equitable, inclusive and well-planned climate transition.</i></p> <p>13. 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?</p>	<p>Support the intent of this recommendation.</p> <p>HCC is supportive of the need to assess the distributional impacts of climate change policy. The Government could provide interim guidance on how to consider distributional impacts given the policy decisions that will be made in the next 2-3 years and then deliver the Strategy in the time outlined.</p>
<p><i>Transport.</i></p> <p>14. Do you support the package of recommendations and actions for the transport sector? Is there anything we should change, and why?</p>	<p>Necessary action 2.</p> <p>Develop an integrated national transport network to reduce travel by private vehicles and increase walking, cycling, low emissions public and shared transport.</p> <p>HCC strongly support the need for an integrated national transport network that supports public and active transport. This recommendation is urgent, and this should be changed to be a time-critical action.</p> <p>The public transport infrastructure needs to improve substantially so that it is more attractive, safe and people-friendly. To do this significant financial support is needed to improve these services beyond what current funding structures allow.</p> <p>HCC support the strengthening of the GPS on Land Transport and the setting of strong specific and time-bound targets. The current focus is too much on climate resilience and not on transforming the way we travel.</p> <p>HCC would support the Commission in providing a recommendation around the percentage increase in funding required for these transport investments as well as recommending Government improve the Funding Assistance Rate for councils for mode shift projects.</p> <p>HCC has demonstrated leadership around flexible working and would recommend the Commission broaden the recommendation to flexible work rather than work from home. This could include sharing work spaces and satellite offices where employees can walk rather than commute.</p>

CONSULTATION QUESTION	OUR VIEWS AND RESPONSES
	<p>Time-critical necessary action 2 - Accelerate light electric vehicle uptake and Necessary action 3 Accelerate light electric vehicle uptake.</p> <p>HCC is supportive of the transition to light electric vehicles as part of the response to reduce transport emissions.</p> <p>As the Commission note, HCC strongly support ensuring the policies support an equitable transition for all New Zealanders.</p> <p>HCC is supportive of the charging infrastructure plan. We suggest that this will be important to avoid poorly designed and located chargers. A common communication and payment protocols will also secure and facilitate use of what will become vitally important infrastructure. HCC recommend that the Government work with local government on the charging infrastructure plan to ensure alignment with council planning.</p> <p>Necessary action 4 - Increase the use of low carbon fuels for trains, ships, heavy trucks and planes.</p> <p>HCC support the decarbonising of the rail system and expansion of the rail network to enable more heavy goods to be transported via rail. Biofuels have the potential to provide emission reductions in difficult sectors such as rail.</p>
<p>Heat, industry and power sectors.</p> <p>15. Do you support the package of recommendations and actions for the heat, industry and power sectors? Is there anything we should change, and why?</p>	<p>Time-critical necessary action 3 - Target 60% renewable energy no later than 2035.</p> <p>Support the package of measures.</p> <p>Necessary action 5 - Maximise the use of electricity as a low emissions fuel.</p> <p>Support the package of measures.</p>

Necessary action 6 - Scale up provision of low emissions energy sources.

A key pricing issue for electric process heating is network demand charges. The impact of demand is passed back to the consumer by way of demand charges. While demand side customers often have little flexibility in controlling their electrical demand, network companies could do more to manage this by adding electrical storage systems to dampen demand spikes and utilise customer load diversity. This approach could help support the transition to electric process heat.

Supportive of the move to renewable energy target of 60% as it will support the transition whilst not putting undue economic impact on community and businesses.

Government should also support the transparency of how efficient buildings are and the pay back of

the up-front investments.

Standardised reports on the efficiency of homes should be required at point of sale as well as rental.

Necessary action 9 - Increase energy efficiency in buildings.

Supportive of new standards for both operational and embodied emissions.

Necessary action 10 - Reduce emissions from urban form.

Supportive of the need to focus on urban form and the important role it plays in unlocking other emissions reduction options. Agree that a consistent approach to calculating emissions impacts is required so that these can form part of the decision making.

The recommendations need to be strengthened, including outlining the need for clearer policy implementation and guidance.

The NPS UD is a prime example where climate change has not been well integrated and without clearer direction from central government the interpretation of the NPS will be varied across the country.

Forestry.

16. Do you support the package of recommendations and actions for the forestry sector? Is there anything we should change, and why?

Necessary action 12 - Manage forests to provide a long-term carbon sink.

HCC is supportive of the increase in focus on native permanent forests.

HCC would like to see better emissions factors for different types of forestation and wetlands included as part of the suite of carbon sinks.

The draft advice does not explore the role of biodiversity in urban environments in relation to carbon sinks and the additional co-benefits that it provides.

HCC recommend that the Commission includes urban reforestation in the draft advice, including an investigation of the emissions benefits of multi-layers and the co-benefits of biodiversity corridors and habitats in urban environments.

Waste.

17. Do you support the package of recommendations and actions for the waste sector? Is there anything we should change, and why?

Necessary action 13 - Reduce emissions from waste.

HCC is supportive of the focus on waste reduction and the diversion of organic waste from landfill.

HCC agree that greater focus on the circular economy should be included in the New Zealand Waste Strategy.

	<p>HCC is supportive of an increase in product stewardship schemes where the additional administration warrants the action. HCC suggest that in assessing high emissions potential that this should consider the embodied emissions of the products/wastes.</p> <p>HCC recommend that both embodied and operational emissions are used to inform the changes required in waste management.</p>
<p>Multisector strategy.</p> <p>18. Do you support the package of recommendations and actions to create a multisector strategy? Is there anything we should change, and why?</p>	<p>Necessary action 15 - Integrate Government policy making across climate change and other domains.</p> <p>Strong leadership is required for climate change to be integrated across Government. One way to do this is for climate change to sit within the central circle of government to gain better alignment across all Government entities.</p> <p>Changes to the resource management legislation need to be properly implemented. The guidance to support the local implementation will be critical to the effectiveness of the legislation.</p> <p>Supportive of climate change considerations being incorporated into procurement policies.</p> <p>Necessary action 16 - Support behaviour change.</p> <p>Much greater focus on the societal and behaviour changes that are required. Working from home, sharing economy etc.</p> <p>Necessary action 17 - Require entities with large investments to disclose climate related risks.</p> <p>HCC is cautious around mandatory disclosure for local government. HCC has assessed our current approach against the TCFD framework and recognise the importance of disclosure. However, we have concern regarding the additional reporting requirements and costs associated with mandatory disclosure.</p> <p>Time-critical necessary action 6 - Align</p>

	<p>investments for climate outcomes.</p> <p>HCC support the inclusion of shadow carbon price in investment decisions. HCC recommend that appropriate guidance is developed on how to include shadow carbon price/long-term abatement cost values into decision-making for local government.</p>
<p>Rules for measuring progress.</p> <p>19. Do you agree with Budget recommendation 5? Is there anything we should change, any why?</p>	<p>Budget recommendation 5 - The rules for measuring progress towards emissions budgets and the 2050 target.</p> <p>HCC is supportive of using the production-based approach for measuring emissions for the emissions budgets and 2050 target. HCC is also supportive of the further development of the consumption-based approach as a complementary tool for understanding our emissions.</p>

APPENDIX 2 - RELEVANT POINTS FROM OTHER HCC SUBMISSIONS

1.1 As outlined in our submission, HCC has a strong interest in the climate change response and has submitted on various other consultations in relation to climate change.

1.2 Climate Change Response (Zero Carbon) Amendment Bill

- *“HCC supports the purpose and establishment of a Climate Change Commission as outlined in the Bill, noting that the Commission will provide independent expert advice on climate change mitigation and adaptation, as well as monitor and review progress towards both these components”*

1.3 Draft Local Government Position on Climate Change Mitigation - 2018

- Impact of Landuse and Urban Form on Climate Change
 - Research by the New Zealand Centre for Sustainable Cities highlights that urban form influences energy use and shapes local carbon emissions, particularly as housing intensification can cut emissions via shorter transport journeys and reduced private passenger transport use. The Centre recognises that urban form is a useful planning domain through which urban emission reductions can be achieved over time. However, it is acknowledged that changes in urban form can take decades to change the urban landscape.
 - Over the last 10 years HCC has been largely successful in achieving the strategic goal of achieving an equal split (50:50) between residential growth within the existing areas of the city and new greenfield growth areas. Among the other potential co-benefits of this policy outcome (greater accessibility, improved public health, viability of public transport), it is hoped that continuing to achieve this goal will have a positive influence on lowering Hamilton’s overall emissions profile. Nevertheless, this local strategy will need to be supported by greater central government focus on accelerating the transition to low carbon urban form and transport.

1.4 Urban Development Bill

- HCC is concerned around the lack of comment on climate change. The Bill’s principles include that SDPs must have particular regard to low-emission urban environments and promote sustainable management of natural and physical resources. HCC seeks that the Minister for Climate Change must be engaged during the initial assessment of an SDP to help deliver on this purpose.

1.5 Transforming the Resource Management System: Opportunities for Change: Issues and Options Paper

- Land use planning should be able to direct urban growth to a form that reduces the need for private vehicle use and is supported by sustainable and affordable infrastructure. This has to be done at a national level, as any local approach although with strong merits, could be undermined by different approaches by other local authority areas. Higher density, urban development which lends itself to walking, cycling and public transport use should be recognised as more sustainable and affordable, than for example, new towns or growth in rural areas.
- Also, urban areas require resources, such as electricity and water, which normally come from far beyond its own boundaries. It is critical that these needs are considered when decisions are made far away about electricity proposals or water use, as examples.
- A national approach to land use planning requirements around climate change and natural hazards, including resilience to both, is necessary.

1.6 **Waka Kotahi Investment Proposal 2021-2031**

- HCC notes that mode shift is an appropriate response to climate change and supports any initiatives that increase mode shift.
- There is very little information in the Investment Proposal, apart from a focus on mode shift, to indicate what funding Waka Kotahi has set aside to ensure the shift sought. HCC requests a specific presentation on this topic.
- HCC notes that on 2 December 2020, the government declared a climate emergency and committed the public sector to achieving carbon neutrality by 2025, becoming an exemplar that sets the standard for all to meet 20250 targets. Cutting transport emissions is clearly one of the more significant contributions that the Waikato can make.
- As indicated previously, Arataki has identified Waikato as having the second highest carbon emission profile in the country with NIWA reports identifying Hamilton's transport infrastructure as a significant contributor.
- While we appreciate, government has only just declared a climate emergency, HCC is concerned at the lack of focus in the Investment Proposal on progressing the GPS strategic priority around climate change and in particular developing a low carbon transport system.
- HCC would like to see more investment by Waka Kotahi in addressing climate change through mode shift and other actions.

1.7 **The Building for Climate Change Programme (Ministry of Business, Innovation and Employment) 2020**

- The staff response provided overall support for the direction and intent of MBIE's Proposed Changes to Assist Reducing Carbon Emissions in the Building and Construction Sector and made a number of key points, including:
 - The Government needs to give much greater consideration to the 'cost-benefit' analysis when introducing new policies or standards (including those likely to result from MBIE's current proposals), particularly where the implementation of such policies/standards falls directly on local government, with no commensurate funding from Government.
 - MBIE's proposals, if implemented, will clearly have a significant impact on the construction and building industry - including adding to the construction cost of residential and commercial buildings.
 - The proposals will also impact significantly on councils in their role as a Building Consent Authority e.g. the time and cost requirements around training staff to learn new systems and the additional time (and cost) required to undertake embodied carbon calculations in checking/approving building consents.