

***“The role of local government in meeting New Zealand’s
climate change target”***

Draft submission by the
Wellington Regional Council

1. Introduction

- 1.1 The following comments are by way of response to two related documents. One is a report prepared by Harrison Grierson Consultants Limited for Local Government New Zealand (LGNZ). This report was originally prepared (as a briefing paper) and presented on 29th November 2000 to the Local Government and Environment Select Committee to assist the Committee on the possible roles that local government might play in helping meet New Zealand’s climate change target. The briefing paper has subsequently been revised and has been sent to LGNZ member organisations as a “think piece”. LGNZ now seeks comment and input from its members (by 2nd March) in order to give a more comprehensive response from local government to the Select Committee.
- 1.2 The second document is the Select Committee’s Interim Report (SCIR), released in December. It sets out various recommendations and raises a number of related questions on which it seeks responses from local government (collectively and individually). Submissions are due by 15th March 2001.
- 1.3 Given the relationship between the two documents, this submission addresses a number of themes, questions and recommendations that are relevant to both reports and will therefore be forwarded to LGNZ and the Select Committee.

2. General Comments

- 2.1 The Regional Council agrees with the Select Committee on the importance it attaches to climate change as an issue, and broadly confirms the Committee’s identification of areas where local government may be able to help meet NZ’s climate change target for greenhouse gas reduction. Similarly, the Council feels that the LGNZ report is suitably comprehensive in identifying real or potential roles for local government and would strongly support its conclusion that while some progress is being made, a more focussed approach is needed.
- 2.2 Both reports list activities that involve local government either as a direct player or indirectly, as policy shapers or implementers of rules. There are some good ideas about how local government can increase its direct and indirect roles with beneficial effect.

2.3 As a general comment, however, we feel that the Select Committee and the LGNZ report may be overly optimistic, both about the contribution currently being made by local government to address climate change and in its potential to assist in future. Climate change benefits, where they do arise as a result of local government activities, are often small scale and indirect, almost accidental, by-products of other policy initiatives. The reports identify numerous areas where they describe “co-benefits”, but the Regional Council takes the view that many of these co-benefits are co-incident rather than purposeful. Local government addresses climate change in a fragmented way rather than as a deliberate policy focus.

2.4 Similarly, both reports recognise the significance of transport as a major contributor to climate change problems. However, overseas experience suggests that effective ways of addressing this emission source appear to be difficult for local government to implement, despite the positive note struck in both reports about local government’s role in transport and urban planning. Transport is a hard, but crucial, nut to crack.

2.5 More specific comments in the submission develop these general comments and can be summarised as follows:

- There is a need for leadership, clear roles and purposeful commitment to “on-the-ground” action to prevent, and to manage the effects of, climate change. This need for leadership and clarity on roles applies both between different levels of government and within individual government organisations;
- There is an associated requirement for climate change to become a legitimate policy area for local government to address, and to be suitably resourced (both in terms of technical skills and, where appropriate, funding). With a clearer mandate and resources, local government can deliver at the local level;
- Information about climate change, and policies aimed at dealing with the issue are, of themselves, insufficient means to achieve effective results. A more comprehensive and targeted package of implementation actions are needed to complement good information and desirable policies;
- Transport is the major source of CO₂ emissions, and trends in the use of energy (and creation of emissions) by transport are upwards. Given the geography of New Zealand and the distribution of its population, and the attitude of New Zealanders to their personal mobility, private transport and its associated emissions are probably the most important, but most difficult, area to effectively tackle; and
- Climate change as a “hazard” should be holistically addressed through an emergency management approach, and there is an opportunity to

link the above climate change considerations into the current Civil Defence Emergency Management reform.

3. Leadership, mandate and information on climate change

Leadership and uncertainty

- 3.1 The evidence is accumulating that climate change is occurring as a result of human activities, and the Regional Council supports the need for government, business and individuals to each take some responsibility to tackle the causes of climate change and to anticipate living with the effects.
- 3.2 In this regard, leadership by central government can legitimise action that might previously have been avoided because of two related arguments, leading to procrastination. The two arguments are, first, that NZ is a small country and that there would be little beneficial global impact (but potentially significant local economic costs) from actions we might unilaterally take, or take first. Therefore we should let other emitters - bigger players - take the lead. Secondly, that given the uncertainty of the nature of effects (what are they, when might they happen, and where?), why waste money on measures that might prove at best inappropriate or, at worst, unnecessary?
- 3.3 These arguments have justified inaction. It is good, therefore, to see that climate change is now being seriously addressed by government, both in regard to mitigating causal factors and dealing with the consequences that are likely to eventuate, even if we can make some progress in reducing emissions. The Regional Council is pleased that the Government sees climate change as an urgent and important issue to address, and in a comprehensive and more co-ordinated manner. This message is apparent in the Select Committee's Interim Report (page 6, Basis for the Report) and in Energy Minister Pete Hodgson's recent statements about the pressing need for action and the range of policy measures currently being pursued.

Clear and complementary roles

- 3.4 Nevertheless, it will be important that recognition of climate change as a significant factor in economic, social and environmental life finds expression in clear roles and actions for different levels of government. While the focus of the two current reports is on local government's role, consistency with and the inter-relationship with central government are vital. The Select Committee Report, for example, talks of "leadership" by local government (page 7), as a significant energy user. Central government too can set a role model for community behaviour in energy management. The questions (on page 7) about "encouraging" or "requiring" participation in EECA Energy Wise schemes apply to both levels of government. It is heartening to see this recognised (page 21).

What local government can and cannot do...

- 3.5 Local government **can** do something about cutting energy use in-house, and although the sector is not a major user (1% of national use in 1997), it can be an important role model for behaviour. Local government **may** also have an impact through development of policies and rules that apply to activities within their areas. However, there are numerous impediments to further progress here, and as noted earlier, the Select Committee (and LGNZ, in informing the Committee) may have painted an overly rosy picture of these policies, and the in-house savings.
- 3.6 Some authorities certainly are seeking and achieving greater energy efficiency in-house, but we suspect that the motive is often more about saving dollars than saving energy and avoiding emissions. The Select Committee Report asks (Questions 1 and 2 on page 7) for comment on the level of resources available to the Energy Efficiency and Conservation Authority (EECA) and whether local authorities should be encouraged or required to participate in EECA programmes.
- 3.7 Energy management has a low profile because it is not a major item of local authority expenditure. If there was a stronger formal “requirement” to report on energy management, and for a range of environmental, social and financial benefits (the triple bottom line), then managers may be more inclined to take leadership and actions on energy management. Transparency and accountability under current local government legislation, however, places an emphasis on financial aspects and reduces flexibility in spending with longer term and wider benefits in mind. In short, central government needs to legitimise local government expenditure for climate change (and other) benefits. Providing EECA with sufficient resources to work with local government on this area would be supported.

Legislative limitations

- 3.8 Leadership by government within the community, and by managers within organisations on climate change needs to be not only an OK thing to be doing, (a legislative mandate) but also, the things to be done need to have practical, tangible outcomes (means of implementation). This is not necessarily the case currently.
- 3.9 The Regional Council notes, for example, that the LGNZ and the Select Committee reports take the view that local authorities can use the Resource Management Act 1991 (and transport legislation) to promote particular transport modes and manage vehicle emissions. It is certainly possible to give direction with regard to these matters, but Regional Land Transport Strategies and Regional Policy Statements and plans can only provide high order policies. They need to be complemented by a whole range of targeted means for putting them into effect, some of which stem from central government leadership and resources.

- 3.10 The ability of local government to deliver desirable outcomes is, in the Regional Council's view, limited. Even when authorities do seek such policy outcomes, they may not have been able to actively implement them (e.g. urban containment policies in district plans that have run up against arguments for market freedom during the last decade). Also, as the Select Committee Report notes in relation to vehicle emissions, some regional policy statements have policies that address climate change, but no plans have rules for controlling emissions from individual vehicles. This is because they are too hard to enforce and expensive to monitor.
- 3.11 Similarly, the presence in Regional Land Transport Strategies of policies that promote public transport does not mean that people will necessarily travel by that mode! Quality service needs to be supplied (the carrot) and use of individual vehicles discouraged (the stick), whether by economic instruments or regulation.
- 3.12 On a broader point, the LGNZ report briefly examines and seeks comment on the option of a National Policy Statement (NPS) as a means of helping meet the climate change target. Given the comments made above about high level policy in Regional Policy Statements and their ineffectiveness, the Regional Council doubts that a NPS by itself would be useful. Preparation and approval under RMA processes are likely to be lengthy, and in accommodating wide ranging views on its direction and content, the eventual document may mean many things to many people. In assessing the value of the NPS, questions to be asked are What can the NPS do that we cannot do now? and Can we afford to wait?

Information alone is not enough

- 3.13 The Regional Council agrees with the observation in the LGNZ report (Executive Summary and page 9) that information provision alone will be insufficient to bring about necessary changes. Public information about adverse effects has not, for example, made any appreciable difference to growth in transport energy use. People's behaviour tends to be driven by cost rather than conscience. Good information and worthy policy aims are important, but government – central and local - need the mandate and means to translate the best of intentions into widespread and effective actions.

4. Transport

- 4.1 While some of the comments above have referred to transport by way of example, there are a number of specific points to be made about transport, energy use and emissions.
- 4.2 Current trends in CO₂ emissions point to a 40% increase over 1991 figures, with energy use for transport the main contributor to this figure. The Select Committee therefore recognises that transport is "an appropriate focus for policy initiatives". The Committee also acknowledges that the RMA is not

good in dealing with non-point sources (vehicles) and suggest that Regional Land Transport Strategies have a “major focus...on meeting roading needs of eve increasing private vehicle numbers rather than on developing overall land transport strategies.” There is also recognition that there are “conflicting objectives and ambiguity”, with transport plans. Many plans look to promote public transport but then also cater for increases in road capacity. Authorities appear not to understand concepts like induced traffic generation through road building, and its vicious circle of extra capacity, temporary efficiency gains, followed by more trips and more energy use, leading eventually to more congestion, more emissions and demands for more capacity.

- 4.3 The Committee suggest (page 11) that a “proactive approach” is required by authorities to improve their public transport infrastructure and “increase the role of public transport within the transport system”. The Committee seeks specific responses on how this might happen. The Regional Council offers the following comments.
- 4.4 In principle, promoting public transport should provide benefits in reducing CO2 emissions. In practice, significant promotion of public transport is very difficult largely as a consequence of Government legislation focused on delivering road user benefits and an unnecessarily bureaucratic attitude from Government agencies. For instance Transit NZ’s mandate is to “operate a safe and efficient highway system” and Transfund NZ’s mandate is to “allocate funds for a safe and efficient roading” system.
- 4.5 Transfund NZ’s Alternative To Roding (ATR) procedures are extraordinarily onerous and because they will fund only the proportion of benefits that accrue to the road user, their funding contribution to a project can be quite small. For small but useful infrastructure projects it is usually not worth spending a significant sum of money to get an ATR evaluation to obtain any Transfund NZ funding support. The history of ATR funding shows that very few projects have been funded in this way.
- 4.6 Recent initiatives such as Patronage Funding have also been burdened with excessive bureaucratic requirements. Other difficulties exist too. Under Transfund NZ’s Competitive Pricing Procedures, it has not been possible for the WRC to have any more than a one year contract with Tranzrail as Tranzrail is a monopoly rail provider. This is a major disincentive for Tranzrail or any future owner of the suburban rail services to reinvest in their business. Consequently rolling stock, stations and other infrastructure is run down. As a Regional Council cannot own the infrastructure, any funding by the Council to upgrade any of this infrastructure becomes a ratepayer “gift” to a private sector company with no accountability or control by Council. Similar problems exist with the ownership and development of bus infrastructure.
- 4.7 We are pleased therefore that the Select Committee recognises the complementary role that central government must play in transport policy aimed at climate change management (pages 19-20). Co-ordination between

central government initiatives (e.g. Energy Efficiency and Conservation Strategy, Vehicle Fleet Emissions Control Strategy, road pricing) is essential, as are associated funding mechanisms and a legislative framework to enforce environmental standards.

- 4.8 There can be little doubt, however, that even with good will, it is hard to implement appropriate mechanisms. The overseas experience identified by the Select Committee and LGNZ shows that in Europe, while local authorities can achieve 25% reductions in energy use and emissions from their own facilities, “less has been achieved in respect of emissions from transport, which have continued to **grow**” (emphasis added). These figures and the comment confirm the scale of a problem that all countries face.
- 4.9 As noted in the Select Committee report and touched upon in paragraph 4.2 above, there is a fundamental problem with emission control strategies focused on gains that might be made in energy efficiency and more efficient road operation. Whilst gains in efficiency have merit and should be pursued, the gains are swamped by the growth in demand. Even the benefits of public transport and pedestrian initiatives suffer the same fate. Growth in travel demand and car use swamps the incremental benefits that are achieved.
- 4.10 This means that in addition to efficiency gains and public transport and promotion of walking as a mode, serious efforts are required in the area of Travel Demand Management. There are several issues involved here and they include the following:
- (i) A need to introduce road pricing (not just congestion pricing) – congestion pricing only deals with peak period traffic on congested roads whereas the periods of fastest growth in urban areas are off peak and weekends. Also, congestion pricing alone will not deal with induced traffic when road improvements are made and also may provide a perverse incentive for decision-makers to add extra road capacity to avoid pricing. Further, congestion pricing will increase the demands on public transport only at peak times and not at off peak times making the viability of public transport less economic.
 - (ii) A need for District Plans to be consistent with Regional Land Transport Strategies. There are three reasons for this. The first is to ensure that the land use distribution in the region is compatible with the transport (and pricing) system so that the demand for travel is managed. The second reason is to ensure that land uses actively promote access from non-car modes whereas most District Plans are focused on car access. The third reason is to ensure that parking provision for land uses is compatible with the transport system.
 - (iii) A review of Transfund NZ’s benefit-cost procedures so that they are compatible with Travel Demand Management. Currently these procedures reward traffic growth and congestion.
- 4.11 In terms of making real progress, then, NZ may need to be “thinking global” but very much acting in a way that emphasises local co- benefits from a

reduction in energy use by transport. The first benefit (after national balance of trade advantages from reduced oil imports) would be local air quality enhancement. There would be better returns on investment in public transport services and infrastructure. There are also amenity, ecological and human health benefits from lower use of fossil fuels in transport. We should be legitimising, and explicitly seeking, these sorts of benefits as part of a package of initiatives to tackle climate change. Where these benefits currently occur, as by-products of other initiatives, we mention them almost apologetically!

5. Emergency management and climate change

5.1 Despite our best efforts at reducing emissions and efficient energy use, our climate is nonetheless expected to change. Scientists predict we will experience more extremes - of high rainfall (leading to erosion, landslides and flooding) and of drought (leading to water shortages and saltwater intrusion into aquifers). This means that communities will have additional events and potential emergency situations to adjust to. Examining climate change as a hazard, with associated risks and opportunities, and linking this with sustainability approaches, is an area where local government has a role to play.

5.2 Taking a civil defence emergency management focus on climate change reveals a number of areas (many of which already occur) where local government can address climate change to promote safer, more resilient communities. Many of the activities listed below already occur as “adaptive responses” to use the LGNZ and Select Committee terminology, but these are not often undertaken specifically for climate change purposes.

- **Risk reduction:** ecological restoration of hazard buffer zones (such as coastal dunes and riparian margins), flood protection works and floodplain management planning, coastal hazard planning and protection works, flood or drought assessment, mapping and scenario planning, contingency water supplies, risk management (at all levels of management and across all sectors);
- **Readiness:** public and organisational awareness of climate change hazards and risks, preparedness for rainfall or drought events, well-maintained infrastructure and emergency services, civil defence plans and capability, rainfall and river monitoring, flood warning systems, erosion monitoring;
- **Response:** as per usual agency functions;
- **Recovery:** policies for recovering from events and long-term strategies for adapting to a changed climate.

5.3 Linking the wider activities of civil defence emergency management to that of resource management and energy efficiency will improve community

resilience to climate change. We also recognise the difficulties of holding and using hazard information (raised on page 8 of the LGNZ report) and see a need to be able to use such information in a constructive way. We recommend that central government provide guidance for risk management approaches to climate change, to ensure consistency of approach (as opposed to uniformity) among local authorities. The civil defence emergency management regime is currently undergoing substantial reformation, providing an ideal opportunity for the Ministry for Emergency Management and the Ministry for the Environment to provide such guidance.

6. Other points

- 6.1 Waste generation is strongly linked to the generation of greenhouse gases and climate change. Greenhouse gases are produced particularly at landfills and through incineration. Although incineration as a disposal option is becoming less prevalent, material being disposed of at landfills is increasing. Between 1982 and 1995, waste disposed of at landfills throughout New Zealand increased by 30%.
- 6.2 We appreciate that the Ministry for the Environment and LGNZ are addressing waste minimisation and have developed a draft strategy for doing so. However, that document does not address air discharges. There will be direct spin-off effects as volumes of waste are reduced, including a reduction in the potential greenhouse gas emissions. Further, a number of now closed landfills are still producing methane gas and are not being actively managed. Unless a problem arises, such as the gas entering neighbouring homes and becoming a health hazard, little is done to reduce these emissions. Perhaps some further regulation is required to ensure post closure monitoring and regulation of these landfills.

7. Conclusion

- 7.1 Climate change has emerged over the last decade as a major issue for the world, and for constituent communities, to tackle. It affects us all. We are all part of the problem. We all – individuals, business and government – have to be part of the solution.
- 7.2 Recent scientific reports indicate possibly greater impacts from climate change than previously suggested, and trends in global carbon-based energy use, a major contributor to the problem, continue to rise. Given these trends and their possible consequences, there is no room for complacency about what we may already be doing, because the emerging signs are that even if we are doing something, it is not enough.
- 7.3 Perhaps because it has been an emergent issue, and the extent of its causes and ramifications evolving, there has been no real chance to take a more holistic

approach to causes and effects. Local government may already be addressing climate change through a variety of initiatives, but as LGNZ notes, few are directly linked to climate change.

- 7.4 As we now seek to move from a fragmented approach to a focussed programme, the key messages from international experience (set out on page 14 of the LGNZ report) are instructive, and should be used in developing a NZ response.
- 7.5 A comprehensive response has related component parts, co-ordinated roles and a programme of specific actions. The role of local government in this needs to be further developed, and these two reports begin to recognise that role. The Regional Council therefore supports Recommendations 1-8 (on pages 28-29) of the LGNZ report as these recommendations seek a framework for central and local government to work within, roles for key players (including EECA), and resources to implement necessary actions.