

Submission to the Greater Wellington Regional Council on the Draft Climate Change Strategy

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9 April 2015

The NZ Centre for Sustainable Cities would be happy to make an oral presentation to the Regional Council.

About the NZ Centre for Sustainable Cities

The New Zealand Centre for Sustainable Cities is an inter-disciplinary research centre dedicated to providing the research base for innovative facilitation of the economic, social, environmental and cultural development of our urban centres. As well as undertaking research, we make submissions from time to time to central government and councils on a range of issues relevant to cities. The Centre is currently running a 4- year Resilient Urban Futures Programme, which began in October 2012, funded by the Ministry of Business, Innovation and Employment.

Introduction

The Centre applauds the Council on an excellent draft strategy, and supports almost all the goals and actions set out in the draft strategy. But we note potential inconsistencies between the draft strategy and the direction in which the Council seems to be heading.

For example, the draft strategy's level of ambition seems at odds with the lesser ambition (at least in the important transport arena⁴) evident in other plans that will bind GWRC (for example, the Regional Land Transport Plan).

This submission provides commentary on key aspects of the Draft Climate Change Strategy:

- the vision and goals GWRC has adopted, including the importance of climate change mitigation
- consistency within the document and across GWRC
- key policy priorities and actions, and consistency with other plans.

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⁴ Transport emissions are the biggest sector of emissions (about 37% of total gross emissions) for the region (p.5)

Vision, goals and principles

The draft strategy proposes a *vision* (4.1) that:

Greater Wellington Regional Council strengthens the long-term resilience of the Wellington region through climate change action and awareness.

We generally support this, but note that an outcome of *resilience* is insufficient in itself. We propose that the words “and sustainability” be added after the word “resilience”. Our logic is that something (e.g. the oil industry) may be resilient but not sustainable; in our view, both resilience and sustainability are desirable and are complementary.

We note that 85 percent of submissions on the development of GWRC’s Climate Change Strategy stated that they thought future climate change effects should be a high, very high, or top priority for GWRC’s planning and decision-making processes going forward. We strongly agree.

We are also pleased to see that mitigation is one of the three core strands (objectives) of the draft strategy (4.2). We believe this to be essential, as some of the worst impacts of potential climate change can still be avoided if all actors including councils contribute actively to mitigation. We believe it is vital that regional councils make a contribution alongside central government and district councils. We support GWRC’s goal of working with others to ‘help to create a smart, innovative, low-carbon regional economy.’(p.9)

We support the implementation principles (4.3), especially the principle of commitment to action in the face of uncertainty.

Consistency within the document and across GWRC

Consideration of Appendix 3 of the draft strategy suggests that, although a ‘high ambition’ scenario (as illustrated by URS Consulting) is possible in theory, GWRC officers do not believe it can be delivered in practice, partly because various factors such as carbon and oil prices are beyond the influence of GWRC. In particular, Appendix 3 notes:

Significant changes in transport behaviour are unlikely over the short timeframe of the projections [2020], given relatively inelastic responses by the transport sector to energy pricing and the historically slow rate of behaviour change in shifting away from car travel. The feasibility, costs and benefits of more ambitious policy interventions would require careful evaluation. (p.23)

This is a ‘cold shower’ after the ambitious tone of the remainder of the document. Not only does it seem to be saying that substantial emissions reductions are unlikely by 2020, but also that the work has not been done to evaluate an ambitious transport emissions scenario. This hints that not all parts of GWRC are ‘on board’ with the mitigation policies proposed in the strategy, or

else that, even if these policies are accepted in principle, little effort may be made to implement them with any ambition.

We suggest:

1. It would be helpful if more work *was* done, using a more realistic timeframe of 2025 or 2030, to illustrate the scope (and policy requirements) for *ambitious* emission reductions, identifying in particular those which the Council had a realistic chance of influencing.⁵
2. Rather than making conservative assumptions about the 'historically slow rate of behaviour change in shifting away from car travel', more ambitious forward-looking outcomes should be considered by council officers, again focusing on what the Council can influence, especially around travel behaviour (working with WCC and others).

An example can be drawn from one of the assumptions of the URS work listed in Appendix 3: that there is a doubling of current electric buses and replacement of 50% of diesel buses with hybrid diesel buses... (p.22). This assumption seems consistent with Action 1.2 of the draft strategy (Appendix 1), whose wording is 'Investigate use of sustainable (low carbon) fuel sources for passenger services.' Appendix 2 notes that this is 'within the control of GWRC and public transport providers KiwiRail and NZ Bus.' But the actions are not detailed or evaluated in the draft strategy, and they may be inconsistent with current or desirable policy trajectories. This suggests more work on the broader costs and benefits is needed on the part of GWRC. (We see the proposed move away from electric trolley buses as undesirable from a carbon mitigation viewpoint, and note that it would increase the level of fine particles in the air: these are highly problematic for respiratory and cardiovascular health.)

Any cost-benefit analysis should consider the high social cost of carbon (including the latest evidence on this) and the co-benefits/co-costs of measures to achieve emission reductions.

3. The Council should develop a clear, transparent and consistent internal plan to develop and implement *ambitious* emission reduction policies and actions, especially in important mitigation areas such as transport, and report on this plan publicly on an annual basis.

Key policy priorities and actions, and consistency with other plans

Our general view is that the policies and actions of the draft strategy make sense.

A concern, however, is that the proposed actions are short term (2015-17) and typically soft in nature. Most of the verbs in the section on Actions are

⁵ This work would also be of interest at the national level, given the urgent need to explore (for the international negotiations leading up to Paris and beyond) the scope for emission abatement.

"investigate", "encourage", "promote", which may in the event lead to little concrete investment or tangible action.

A second point is that there are not really any meaningful (specific/measurable) end-point targets either. The policies and actions are quite general, which is in principle acceptable in a strategy document designed to guide other more specific Council plans. However, it is stated that the document contains actions to be taken in the near term and will be reviewed on a 3-yearly basis (p.5). Given that there are no specific targets, it will be difficult to see how well the Council has been doing, and how effective the actions and the strategy have been (there is not even an indication of the level of reductions in GHG emissions from Council operations aimed for, let alone targets for any other sector to aim for).

Third, it is one thing to state intentions going forward and report work 'underway', as in Appendix 1 of the draft strategy, but it is another thing to meet ambitious decarbonisation goals, when other strategies and actions of the Council, or binding on the Council, such as the Regional Land Transport Plan, are not necessarily consistent with those goals.

Alignment across various strategies and plans is important. For example, it is not clear that the draft strategy is consistent with the target in the draft RLTP (p.41) of reducing absolute CO₂ emissions from transport in the region by 10% by 2025 (relative to 2013 levels). We elsewhere noted that this was unambitious,⁶ and the draft climate change strategy could do better. But at present it does not contain a concrete goal, as far as we can see.

We reiterate the urgency of carbon emission reduction. UNFCCC and IPCC guidance on emissions reductions recommends that wealthy countries should be aiming to cut greenhouse gas emissions by around 80% or more by 2050 (UNFCCC, 2007), and cities, as primary sources of emissions, have a key role to play in meeting targets such as these. New Zealand is already coming under increasing international pressure not only to put policies in place to meet existing targets (e.g. central government's target of a 50% reduction (net) relative to 1990 levels by 2050), but to increase the ambition of these targets. In order to ensure these do not place unnecessary economic burdens on regional populations of the future, Council policies and actions in the transport planning area, in particular, should be making ambitious emission reduction plans.

We also believe that long-term targets require meaningful interim targets, and concrete policy measures, to support and deliver them. Consequently, we believe it is important that all Council strategies and plans set out meaningful interim goals for emissions of carbon dioxide, to give guidance in areas such as land transport. We consider that a strategy which does **not** contain such interim goals would be inconsistent with the direction which residents of greater Wellington have said they wish GWRC to follow.

⁶ See NZ CSC submission on the Draft Regional Land Transport Plan, 20 February 2015. We do not agree with the rather fatalistic approach of the draft RLTP, summed up in its comment that 'Targets are based upon an 'expected future' scenario where future growth in vehicle trips is broadly linked to population growth.' (p.41 of the draft RLTP).

Conclusion

We strongly support the (draft) climate change strategy in principle. But we are concerned that the Council will simply endorse the strategy and then leave it on the shelf. This would be an opportunity lost.

To avoid this, we see a need for an exploration of how the plans and strategies of the Council which are relevant to climate change goals can be adjusted to a higher level of ambition, so that the vision and desired outcomes of the strategy can be realised. Specific and measurable targets should then be developed.

Land transport is the key area where GWRC exercises control over and has substantial impacts on both public and private GHG emissions in the region. In light of this, GWRC land transport policies and plans in particular need to be reconsidered to better align with the climate change strategy.

In general, we consider that Council plans and strategies and those plans which are binding on the Council (such as the RLTP) should, as much as possible, be adjusted to align with the climate change strategy, rather than the climate change strategy being watered down or ignored.

The NZ Centre for Sustainable Cities would welcome the opportunity to work with the Council by providing further information on evidence-based transport policies that can contribute to emissions reduction, both in the short and long-term.

References:

UNFCCC, (2007) Synthesis of information relevant to the determination of the mitigation potential and to the identification of possible ranges of emission reduction objectives of Annex I Parties: FCCC/TP/2007/1. UNFCCC.