



NZ Climate & Health Council

www.orataiao.org.nz

30 April 2016

Wellington City Council's Annual Plan 2016/17 and Carbon Plan Consultation

A: Summary

This submission introduces OraTaiao, describes the basis for our submission, and responds to WCC's [Draft Low Carbon Capital Plan](#) and [Draft Annual Plan 2016/17](#) consultation questions.

As discussed with Neil McInnes of WCC Democratic Services, the deadline for this written submission has been extended to Tuesday 3 May thank you. We would also like the opportunity to speak to this submission, thank you.

Our top ten points are:

1. **Update to a 'Carbon Zero Capital Plan'** as a clear focus for all Wellington's investment decisions and policies – reflecting the new global climate zero-net-emissions action reality and the 1.5°C aspirational warming limit agreed in Paris a few months ago.
2. Update reduction targets to: **100% by 2050, 80% by 2040, 50% by 2030, and 20% by 2020**, because earlier reductions are better and safer, and post-Paris, 'developed' countries lead.
3. Recognise that **'realistic' means 'ambitious'** – Wellington's plateaued emissions over last fifteen years mean we need much stronger deliberate action and investment now.
4. **Urgently update adaptation planning with the latest range of local scenarios** – MfE's '0.5-0.8m sea level rise' advice from eight years ago was always intended as a minimum to update.
5. **Green all Wellington's growth projects – urgently estimate the proposed runway extension's emissions impact** (WCC is responsible for climate impact, not the Environment Court), and include climate-damaging emissions from international travel growth in GHG Inventory.
6. **Set a target to 'warm up' all Wellington's vulnerable households** over the next three years.
7. **Plan for 'Absolutely Accessible Wellington'** not 'Let's Get Welly Moving' – our city's **tri-part transport core** is safe active transport for all ages and affordable attractive all-electric public transport (light rail) for longer trips, complemented by widespread convenient car share.
8. **Accelerate car share** by sharing WCC's fleet now, active partnership, 'MCSR' and more parks.
9. **Electric and bio-fuelled private vehicles are for residual private transport needs** – biofuel advocacy with investment now in electric charging and electrifying WCC's fleet is useful.
10. **Research with Wellington's most vulnerable households on how WCC can support healthy and fair transitions** to a zero net emissions future – co-creating initiatives (including cheaper public transport fares) to quickly put into practice with ongoing evaluation to improve.

B: Who we are

OraTaiao: The New Zealand Climate and Health Council (OraTaiao, The Council) is an incorporated society of over 420 health professional members calling for urgent and fair climate action – with real health gains now and for our future.

We know that climate changes fundamentally threaten human health and wellbeing – and that well-designed climate action can mean greater health and fairness in both the short and longer term.

Within its membership, OraTaiao has some of the world’s leading climate-health experts, and is consolidating linkages with health bodies and other climate-health organisations in New Zealand and internationally. See more at the OraTaiao website, www.orataiao.org.nz.

C: Submission basis

OraTaiao bases this submission on the following:

- Health gains now: Well-designed emissions reduction policies can give substantial cost-effective health gains in the shorter term – additional to longer term reduction of climate threats to our health and wellbeing.
- Health threats: Failure to achieve global greenhouse gas emissions reductions and consequent climate change will bring health damage and costs.
- Inequity: Uncontrolled climate change has the potential to increase health inequities.
- Policy design matters: The impact of greenhouse gas emissions reduction policies on health equity and other equity domains will depend on the design on the policy.
- Inaction to date: As WCC acknowledges, central government climate action (ETS and research) has had no real impact to date, with NZ emissions continuing to increase. Wellington’s emissions have plateaued over the last 15 years, rather than hopefully halving.
- Accelerated global ambition: Four months ago, the world agreed to strengthen the climate change response “in context of sustainable development efforts to eradicate poverty” to hold global warming to “well below 2°C”, and “pursue efforts” to limit the increase to 1.5°C¹. The world also agreed to “global peaking of greenhouse gas emissions as soon as possible”, “recognising that peaking will take longer for developing country parties” and to “undertake rapid reductions thereafter in accordance with the best available science” so the world reaches net zero emissions in the second half of this century².
- Pressure to increase domestic reductions: NZ has agreed to reduce our greenhouse gas emissions 30% below 2005 levels / 11% below 1990 levels by 2030 (short term target) and will be expected to increase ambition over time. NZ is amongst the highest per capita emitters and has one of the least ambitious pledges despite the expectation for developed nations to lead. Currently, global pledges add up to at least 2.7°C warming, adding to pressure for greater reductions.
- Better modelling needed: Economic modelling of Council policy should follow good practice (as outlined by the NZ Treasury) and consider all societal costs and benefits <http://www.treasury.govt.nz/publications/guidance/planning/costbenefitanalysis>

¹ Article 2: 1. (a) “recognising that this would significantly reduce the impacts and risks of climate change”

² Article 4: 1. And noting that the UN’s climate science panel says by 2070 to avoid dangerous warming.

D: Annual Plan 2016/17 Consultation Survey questions

1. Low Carbon Capital

1) Do you support Wellington City Council's aspiration to be the "low-carbon capital"?

OraTaiao **strongly supports** WCC's aspirations – and strongly recommends updating the Plan title to reflect the new global climate zero-net-emissions action reality agreed in Paris a few months ago.

It's time for Wellington to aspire to be the **'Carbon Zero Capital'** post-Paris. This is a clear goal (rather than the somewhat subjective 'low carbon') and will better focus all Wellington's investment decisions and policies. Better still, WCC could become the 'Zero Emissions Capital' by mid-century – just over 30 years away.

'Zero' is 'net emissions' (as agreed at Paris) so WCC can calculate how much forestry emissions absorption is a wise use of limited Wellington land, and the gross emissions reductions needed to take us to zero net emissions by 2050.

2) Will the activities proposed in the draft Low-Carbon Capital Plan ('Carbon Zero Capital Plan') contribute to a meaningful reduction in emissions?

No overall. The lesson from the plateauing of emissions over last fifteen years is that much stronger deliberate action is needed to rapidly reduce emissions. There isn't really a choice.

We congratulate WCC on:

- recognising the health co-benefits of active transport
- claiming a strong advocacy role for policies and initiatives to reduce city and NZ emissions
- recognising vulnerable Wellingtonians who rely on public transport because they have no alternative (however we need widespread increased public transport use)
- helping set up the Greenhouse Gas Inventory and the City-wide Energy Calculator
- attaining CEMARS certification
- at least more or less plateauing measured city emissions over the last fifteen years
- and recognising that: *"After all, mitigation is first line defence when it comes to adapting to climate change. If we don't stop creating the problem then our adaptation challenges become even more difficult"* (or more accurately: *"our adaptation challenges become impossible"*)

We urge WCC not to underestimate our city's capacity for change with statements such as 'most of the available levers to really accelerate action on climate change lie with central government' (p.12), nor underestimate the extent and range of climate changes ahead: '0.5-0.8m sea level rise local councils are asked to plan for by central government' (p.13). This MfE guidance from around eight years ago was always intended as a minimum, with local councils expected to use the best and most up-to-date advice for their areas.

PILLAR ONE – Greening Wellington's Growth

Overall, greening Wellington's growth means **greening all growth** and future projects – climate-damaging emissions from international travel growth have to be counted and considered. Our global climate is destabilised by all emissions growth, regardless of source.

Before going any further with the airport runway extension proposal, **WCC urgently needs the best estimates of emissions impact of the proposed runway extension**. As the Resource Management

Act is currently written, WCC appears responsible for considering the runway extension's climate impact – ironically not Environment Court, despite the overarching threat to our environment (plus health and economy) from climate changes.

Investigate phasing out the Minimum Parking Requirement (MPR) We suggest replacing this with **MCSR (Minimum Car Share Requirement)** with one car share park for every 10-15 dwellings. To keep Wellington compact, we agree that businesses, housing, community facilities, food-producing gardens, forestry, public transport lanes, walkways and safe cycleways are a much better use of limited urban land. WCC needs to rapidly scale up attractive car share, active and public transport modes to reduce the volume of private car ownership which is already making driving difficult in too many of Wellington's narrow suburban streets, and taking away valuable safe cycling and walking space. Widespread car share is the key that enables WCC's agreed transport hierarchy to be reality.

Continue the Smart Energy Challenge Yes, this encourages innovation.

Investigate incentives for sustainable building solutions This appears especially urgent, as the buildings constructed this year are likely to limit the capacity for zero net emissions living during the second half of this century. Could WCC partner with academia and business associations to ensure that there are no excuses for not knowing how to build sustainably? And from 1 July 2016 onwards, introduce variable building consent charges which strongly encourage sustainable building and heavily penalise unsustainable building. WCC also needs to clearly advise property owners of their best case and worst case future sea level, flooding, landslip and storm risks over the lifetime of proposed new buildings and renovations, so that all decisions are made with eyes wide open – and no future legal liability for WCC.

Investigate alternatives for sewage sludge disposal We encourage WCC to quickly investigate beneficial uses for this sludge – without significantly increasing human health risks (both from communicable diseases and greenhouse gas emissions).

Home Energy Saver We especially encourage targeting and support for vulnerable households.

Warm Up Wellington Yes, this has important health and health equity co-benefits. We encourage WCC to set a target of 'warming up' all Wellington's vulnerable households over the next three years, with annual milestones. The cooling capacity of insulation will also become increasingly important for household health as Wellington's days and nights become hotter more often.

The Smart Buildings Challenge Yes, this encourages innovation.

Solar Power Yes, we agree with both the increased awareness of energy use and resilience. The cost-effectiveness is likely to change if a social cost of carbon is applied, and new battery technology enables storage.

PILLAR TWO– Changing the way we move

Healthy climate-friendly urban transport has three essential mutually supporting components – safe active transport, electric public transport that's attractive, reliable, frequent and affordable (light rail gives the scale Wellington needs), and widespread car share for convenient car hire by the hour. Private vehicle use is for the residual journeys which are difficult to make by leg or shared transport for various reasons. Wellington already has too many private vehicles using valuable land space – but needs at least a hundred times more car share vehicles to hire easily throughout the city. Rapidly growing safe active and attractive electric public transport, supported by car share, is top priority.

Electric and bio-fuelled private vehicles are for residual transport needs, although investment now also helps grow the scale we'll need for zero emissions transport.

Support car sharing and electric vehicle charging Research shows internationally that car share needs real partnership – either with a local council or public transport company – to quickly get the scale and visibility required to build customer confidence that a car will be reliably and easily available whenever needed (references available on request). This is much more than free car parks – although these are useful, and we note WCC already supplies over 400 free taxi car parks and numerous bus stops to other privately and publicly operated shared transport modes. The scale of car parks needed over the next three years with real car share partnership for rapid growth may be more like 500, rather than 100. If finding parks in highly visible areas is difficult, this suggests an even greater urgency in building car share as car share rapidly reduces the need for private vehicle ownership and storage. Ultimately, we want all-electric car share fleets, but in the short term, even petrol cars substantially reduce emissions, private car ownership and inefficient land use, increasing active and public transport use.

Car sharing WCC needs to consider international research on rapid car share uptake and move beyond free car park allocation, to actively working in partnership to build the scale of car share needed (references available on request). This may include working with NZTA and GWRC for shared funding as car share frees road space for safer cycleways and walkways, and decongests roads for both public transport and private transport use. WCC dependence on car parking revenue creates risky incentives not in our city's overall best interests – akin to reliance on revenue from taxing cigarettes.

Invest in active and public transport modes OraTaiao strongly supports WCC's expansion of Wellington's active and public transport networks. Investing in cycling has a high benefit-cost ratio with an estimated return of up to \$25 for every \$1 spent on safe segregated cycleways (Macmillan et al³). Wellington needs safe cycling routes for all journeys under 2km and most under 20km. We suggest a 'ten year old' test – would most parents feel comfortable with their ten year old cycling this route to school?

Advocating for lower fares across our Public Transport Network We appreciate WCC's recognition of high upfront public transport costs, especially for low income travellers and compared with other local authorities. OraTaiao would like to see WCC work with GWRC to experiment with cheaper fares to better support lower emissions travel by low income residents and build public transport use especially amongst younger travellers. For example, perhaps all children could travel free, 18-25 year olds, over 64 year olds and Community Service card holders could travel half-price during peak hours and free during off-peak? This could be trialled for three months with widespread publicity to evaluate the impact on public transport use.

Promote electric vehicle uptake Electric vehicles fulfil residual private transport needs – active and public electric transport and car share must become the predominant urban transport choices. The average age of NZ's private vehicle fleet has increased to 14 years – which suggests at this stage, simply relying on replacing petrol and diesel vehicles with electric, will take far too long for climate stability, and will be limited to high income households for some time. However, starting now to promote and facilitate electric vehicle uptake is still valuable for future-proofing Wellington.

³ Macmillan A, Connor J, Witten K, Kearns R, Rees D, Woodward A. The societal costs and benefits of commuter bicycling: simulating the effects of specific policies using system dynamics modelling. *Environ Health Perspectives*. 2014;122(4):335-44. <http://ehp.niehs.nih.gov/1307250/>

Advocate for greater support of biofuels Similar points apply to biofuels as electrifying private vehicles. However, NZ has exciting potential with waste product use to be energy-independent with zero emissions transport through a combination of active transport, electric public transport and car share, supplemented by electric and bio-fuelled private vehicles. We support WCC's advocacy.

PILLAR THREE – Leading by example

CEMARS certification and *Invest in energy saving across the business* We urge ambitious emissions reductions – which will have co-benefits of learning for city-wide leadership plus ratepayer savings. We also strongly recommend that WCC initiate a 'One-in-Five' approach to all domestic and international air travel from 1 July this year – reducing one in five flights for sizeable emissions reductions and savings in time and rates. We encourage WCC to increasingly experiment with meetings and presentations by teleconference (as initiated at recent Car Share Policy hearings). Companies such as Tonkin & Taylor may be able to share experience in reducing their travel footprint.

Council Vehicle Fleet We encourage every vehicle replacement to be electric from now on, which will also help grow the second-hand electric vehicle market in Wellington speeding city-wide uptake. As WCC intends to reduce the fleet, this can be a cost-neutral change overall. We also strongly support WCC making its fleet available to Wellington residents as car share vehicles. This is an incredibly important move to rapidly grow car share to the scale we need. Widespread publicity will be vital. Perhaps WCC could start by making half the fleet available for car share from 1 July this year, and evaluate learnings at year end.

Deliver 'Love Food, Hate Waste' with national partners OraTaiao supports this plan and recommends WCC investigate barriers preventing 99% food business uptake of WCC's Kai to Compost programme and Wellington's KaiBosh food recycling initiative. As well as public education on food waste, perhaps convenient community compost collection points could be created suburb-wide.

Procurement All procurement should be heading towards our zero net emissions future.

Driving Staff Behaviour change Perhaps WCC could celebrate and share the experiences of 'Climate Champions' – including a diversity of WCC Councillors, managers and staff – talking about their experiences in reducing their emissions footprints? This would help create a social norm of being climate-friendly and spread ideas and experiences that work for diverse situations and preferences.

Making maximum use of the levers we do have We strongly support WCC's maximum use of levers.

Carbon management policy and forestry WCC may be best to take a long term investment approach to increasing forestry and native regeneration until emissions prices climb substantially.

Improving consideration of climate issues OraTaiao understands that WCC reports currently simply state whether there is a positive or negative impact on climate, without any quantification of impact. WCC needs to better understand the climate impact of every significant decision, so we urge increasingly more sophisticated reporting of climate impacts. Climate impacts are arguably more important than financial impacts as we prepare for our zero net emissions future.

What else could be done?

Urgently measure the emissions impact from increased domestic and international flights expected from both the airport runway extension proposal and the airport's overall growth plans. WCC needs to take a consistent approach to all sources of emissions in this region.

OraTaiao would also like to see **2016 research with Wellington’s most vulnerable households** on how WCC can support healthy and fair transitions to a zero net emissions future – co-creating initiatives that are then quickly put into practice with ongoing evaluation and improvement.

3) Do you agree with the recommended emission reduction targets for the city?

No, the targets need to be more ambitious to reflect the need for developing countries to lead on zero net emissions. **Being ‘realistic’ means being more ambitious** – our reality is now a fragile global climate with increasingly limited atmospheric space. The longer we delayed (as we have in NZ and in Wellington), the faster we need to move now. A changed baseline is not an excuse to reduce ambition – we need to catch up quickly.

Emissions reductions over the next few years are more useful in stabilising our climate than in a decade or two hence. So start fast and choose the lowest emissions option with every investment. The global atmosphere has a very limited capacity for more greenhouse gas emissions, the less we emit now, the safer our margins for safety. Think of emissions as a **budget** that we want to use as little as possible after ignoring its limits for too long.

WCC also needs to **factor in the likely escalating cost of emissions globally by using a social cost of carbon in decision-making**. This is about wise stewardship of a rating base which is likely to be subject to global economic upheaval and the rising adaptation costs already reality over the coming decades.

More realistic city targets would be: 2020: 20%, 2030: 50%, 2040: 80%, 2050: 100% (regardless of population change) in net terms. We know in our own lives that we can get good emissions reductions quite quickly - but securing our future is a team effort. The world has just agreed in Paris to zero net emissions in second half of this century, with 'developed' countries leading – and the faster we move, the better off we will be. More realistic targets focus every new infrastructure purchase – will it fit a zero net emissions future? We suggest that targets for Council operations be more ambitious – perhaps by treating these same percentage targets as reductions in *gross* emissions, rather than net emissions. In this way, WCC can lead in emissions reduction, gaining experience to apply more generally.

OraTaiao would like to see **international travel included in the regional greenhouse gas inventory this year**. Aviation causes perhaps near 4%-5% of global warming (through both CO₂, non-CO₂ greenhouse gas emissions, and altitude effects) and aviation GHG emissions will likely double or even quadruple by 2050.⁴ At the moment the Council is flying blind. Any Wellington emissions reductions are likely to vanish with expanding international travel, let alone the plans to extend Wellington’s airport runway. This is a global equity issue – we don't have to all become flightless kiwis but we do need to reduce all emissions sources, not escalate. As a growing source of emissions from the world’s rich, pressure is growing internationally to count international travel emissions so future planning and investment needs to explicitly take these emissions into account.

2. Urban Development Agency

Should the Council establish an Urban Development Agency to:

- lead and co-ordinate the physical regeneration of strategic parts of the city? **Yes**
- parcel land together and increase the supply of affordable housing? **Yes**
- deliver large-scale Council developments? **Yes**
- demonstrate good practice in housing development urban design and sustainability? **Yes**

⁴ refer to Section 2 ‘2. Airport runway extension’ of OraTaiao’s submission on WCC’s Draft Long Term Plan 2015-2025, at https://d3n8a8pro7vhmx.cloudfront.net/orataiao/pages/153/attachments/original/1442182688/WCC_LTP_2015-25.pdf

- take a leadership role in areas where earthquake-prone building issues are preventing a timely market response? **Yes**

Comments: OraTaiao urge that all Urban Development Agency decisions be made in the context of our zero net emissions future. This means urban development that keeps our city compact and accessible; responds to vulnerability to coastal erosion, flooding and slips; encourages zero net emissions buildings; and increases health equity and resilience.

3. Zealandia Governance, Food Act fee changes and Private wastewater pipes

OraTaiao has no comment.

4. Kilbirnie Business Improvement District

OraTaiao has no comment on targeted rate use for the Kilbirnie Business Network's use to improve businesses in the district. However, we note that areas of Kilbirnie appear to be increasingly prone to flooding, with projected worsening with sea level rise.⁵ We urge WCC to work with Kilbirnie businesses to ensure they understand the range and likelihood of climate change-related impacts and sea level rises over this century, to avoid wasted investment and legal risk.

5. Other initiatives which Councillors have proposed for 2016/17 funding consideration

Our top five preferred initiatives for 2016/17 funding from WCC's list are:

- Ngauranga to Airport (minor capital projects) and Middleton Road -

OraTaiao supports projects that increase the quality and quantity of active and shared transport.

- Living Wage and Community Grants changes -

As climate changes affect Wellington's most vulnerable households first and worst, OraTaiao supports initiatives that reduce vulnerability and increase health equity.

- Lyall Bay Foreshore Resilience Plan -

With all adaptation policies and projects, OraTaiao encourages WCC to use the best and most recent information on likely sea level rises and climate changes. This includes considering the range of potential outcomes over the life of affected infrastructure, both best-case global mitigation and business-as-usual pathways. WCC cannot afford to give false reassurance by building protection structures with insufficient duration. MfE's original 0.5-0.8m sea level rise guidance from around eight years ago was intended as a minimum, with local government expected to use the most up-to-date advice for their areas.

We have no comment to make on the following initiatives:

Toitu Poneke Sports Hub, Johnsonville Library Kindergarten purchase, New Outdoor Events Series, Toi Poneke support, Placemaking and the Council art collection.

6. Limiting rates increases to the 3.6 percent stated in the LTP

In considering any rates increases, OraTaiao notes that the city's rating base (and tax base) is likely to be subject to global economic upheaval and the rising adaptation costs already reality over the coming decades. Conversely, well-designed climate action can potentially create co-benefits which ease demands on rates, taxes and household budgets.

⁵ Impact of 1m or 2m sea level rises in Kilbirnie and Lyall Bay: Wellington City Council. Assessing the implications of sea level rise, Kilbirnie Town Centre. Kilbirnie Town Centre Plan Working Paper. September 2009. <http://wellington.govt.nz/~media/your-council/projects/files/kilbirnie-sealevel-rise-paper.pdf>. Further sea level rises for Wellington: <http://www.stuff.co.nz/dominion-post/news/73004195/wellington-faces-another-halfmetre-of-sea-level-rise-warns-scientist>.

7. Other matters and general comments

Overall, we urge WCC to understand that climate change is a global medical emergency⁶, and conversely, an opportunity for unprecedented health and other well-being gains for Wellington. A realistic response is an ambitious response – travelling quickly along the globally-agreed zero net emissions pathway and ensuring a healthy fair transition for our most vulnerable households. Each generation is called to step up to the challenges of their age – let's make past and future generations proud of us.

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Thank you for this opportunity for OraTaiao to make our written submission to the Wellington City Council's consultation on the Low Carbon Capital Plan and draft Annual Plan 2016/2017.

Yours sincerely

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⁶ Watts N, Adger WN, Agnolucci P, ..., Montgomery H, Costello A; for The 2015 Lancet Commission on Health and Climate Change. Health and climate change: policy responses to protect public health. Lancet. 2015;386(10006):1861-914.
[http://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(15\)60854-6/](http://www.thelancet.com/journals/lancet/article/PIIS0140-6736(15)60854-6/)