



NZ Climate & Health Council

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Greater Wellington Regional Council

Submission on GWRC's Draft Long Term Plan (LTP) 2015-2025

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OraTaiao: The New Zealand Climate and Health Council includes more than 300 senior doctors and other health professionals across New Zealand advocating climate action for important health and equity gains now – and over the decades ahead.

Thank you for this opportunity for OraTaiao to make a written submission on the Council's Draft Long Term Plan (LTP) 2015-2025. We wish to make an oral presentation to the Regional Council.

Yours sincerely,

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Introduction

OraTaiao welcomes this opportunity for feedback on Greater Wellington Regional Council's draft Long Term Plan 2015-25.

OraTaiao considers that the basis for GWRC's Long Term Plan should be a realistic GWRC Climate Change Strategy. Consultation on the draft GWRC Strategy closed just over a week ago. We have attached our submission on GWRC's draft Climate Change Strategy so that it can be read again in conjunction with this LTP submission.

In summary, we were concerned that the strategy under-emphasised mitigation – reducing emissions of greenhouse gases. There are many sound reasons why rapidly reducing the region's greenhouse gas emissions is the best course for the region's economic and social wellbeing – including future-proofing our region and securing real health gains in the short and longer term.

The challenges for GWRC that need to be addressed in greater detail in the strategy include:

- keeping up with the best and latest evidence concerning science, economics and implementing change;
- ensuring the costs and benefits of both emission reduction changes and adaptation are shared fairly globally, within New Zealand and within our region;
- realistically quantifying the higher scale and speed of emissions reductions required and monitoring progress (including improving GWRC's Greenhouse Gas Inventory baseline data);
- managing widespread rapid emission reduction within areas of GWRC's areas of direct responsibility;
- supporting widespread rapid emission reduction within areas in which the GWRC has no direct responsibility but has shared common interests; adjusting objectives, policies and actions to support the necessary scale and speed;
- developing new actions after 2017 from GWRC's own experience in rapidly reducing operational emissions, local government best practice (within NZ and internationally), and successful pilots of local programmes; and
- ensuring the climate strategy drives GWRC decision-making.

The Wellington region's fair share of greenhouse gas emissions reductions is debateable. In our submission, we gave the example of the Greenhouse Development Rights calculator (<http://climateequityreference.org/calculator/>) which is based on historic responsibility and capacity to calculate each nation's fair shareⁱ, and aligns with the most recent climate science reports from the UN's Intergovernmental Panel on Climate Change (IPCC).

Using mid-range assumptions, limiting historic responsibility to 1990 because of data limitations, and choosing a strong 2°C warming pathway with good odds (and uncertain odds for 1.5°C pathway), the GDR calculator allocates NZ a 44% reduction of gross emissions on 1990 levels by 2020 (49% using the latest NZ 1990 emissions figure of 66.7Mt from NZ's 2013 Greenhouse Gas Inventory). GDR assumes that NZ will make half of this reduction domestically, and fund the other half of reductions offshore.

ⁱ International aviation and shipping emissions are excluded because of data difficulties, but as a quick use of NZ's own CarboNZero calculator (<http://www.carbonzero.co.nz/EmissionsCalc/tourismeditor.aspx>) shows, international transport emissions are huge – and need to be included in GWRC's Greenhouse Gas Inventory before any assertions can be made about regional emissions decoupling from population growth and GDP (or indeed GPI as a better measure of regional wellbeing).

Although GWRC's Greenhouse Gas Inventory is limited to 2000/01 data, if we assume the region's emissions grew at a similar rate as NZ's from 1990 to 2000/01, then this would mean the region's fair share is a reduction of 35% on 2000/01 levels by 2020 (and 33% on 2012/2013 levels by 2020), with the following rough back-of-envelope calculations:

- NZ's emissions increased 19.2% between 1990 and 2000/01ⁱⁱ
- This gives a base rate of emissions of 3.278Mt in 1990 for the Wellington region.ⁱⁱⁱ
- Assuming the Wellington region reduces emissions at the same rate as NZ (although there are potentially good arguments for the region doing more), this means the GDR 'fair shares' approach is a reduction of 22% (0.72Mt) within the Wellington region on its assumed 1990 levels, to reach 2.557Mt by 2020^{iv} – the other 22% (0.72Mt) half of the above 44% GDR 'fair share' reduction being offshore funded by NZ.
- This equates to a 35% reduction within the region on its 2000/01 levels^v, but with 'fair shares' needing Wellington region taxpayers to fund a further 35% of emissions offshore, at whatever cost per tonne for those 1.35Mt.
- Likewise, there would need to be a 33% reduction on current 2012/13 emissions within the region, plus 33% offshore.^{vi}

These calculations however understate true reductions needed, as they do not count the Wellington region's sizeable and growing emissions from international shipping and especially international aviation.

That is assuming the region should reduce emissions at the same rate as NZ – there may be good arguments for the Wellington region reducing more rapidly as it is probably easier to reduce urban transport emissions than rural emissions. However, international transport emissions need to be included in the region's Greenhouse Gas Inventory to give a full picture of the region's emissions. Note that the GDR calculator expects NZ to make half the reductions domestically and fund half of the reductions offshore – and the latter funding will impact on the Wellington region's economy.

Greater Wellington Regional Council Draft Long Term Plan Consultation Questions:

Do you want to present your views in person at a Council hearing?

Yes thank you.

ⁱⁱ New Zealand's Greenhouse Gas Inventory 1990-2012 (<http://www.mfe.govt.nz/publications/climate-change/new-zealands-greenhouse-gas-inventory-1990%E2%80%932012>) 60.6Mt total GHGe in 1990, 70.9 in 2000, 73.6 in 2001, change 2000/01 vs 1990 = $\text{mean}(70.9, 73.6) - 60.6 = +11.6\text{Mt}$, % change $+11.6 \div 60.6 = +19.2\%$

ⁱⁱⁱ Wellington region GHGe 3.906Mt CO₂-equivalents in 2000/01 (URS New Zealand Ltd. Greenhouse Gas Inventory for the Wellington Region, 2014. <http://wellington.govt.nz/~media/services/environment-and-waste/environment/files/greenhouse-gas-inventory-web.pdf>); NZ 1990 GHGe 83.9% of 2000/01 ($60.6 \div \text{mean}(70.9, 73.6)$); estimated Wellington region 1990 GHGe = $3.906 \times 83.9\% = 3.278\text{Mt}$.

^{iv} Wellington region est. 3.278 CO₂-e GHGe in 1990, GDR 'fair shares' -44% for NZ by 2020 compared with 1990 baseline (<http://climateequityreference.org/calculator>) with half funded offshore and half within NZ (i.e. -22%), $3.278\text{Mt} \times (1 - 22\%) = 2.557\text{Mt}$ within Wellington region emissions target at 2020.

^v Wellington region 3.906Mt CO₂-e GHGe in 2000/01, GDR 'fair shares' 2.557Mt emissions within the Wellington region at 2020, emissions reduction within Wellington region by 2020 vs 2000/01 = $2.557\text{Mt} - 3.906\text{Mt} = -1.349\text{Mt}$, % reduction = $-1.349 \div 3.906 = -35\%$.

^{vi} Wellington region 3.793Mt CO₂-e GHGe in 2012/13, GDR 'fair shares' 2.557Mt emissions at 2020, emissions reduction within the region by 2020 vs 2012/13 = $2.557\text{Mt} - 3.793\text{Mt} = -1.236\text{Mt}$, % reduction = $-1.236 \div 3.906 = -33\%$.

1. Do you support our long-term strategy for regional infrastructure? Yes/No
2. Do you support GWRC keeping doing our existing activities? Yes/No

It is difficult to give a simple yes or no answer to either of these questions.

OraTaiao strongly urges GWRC to review all existing activities in the light of our recommendations on the GWRC’s draft Climate Change Strategy. We believe this Strategy with a realistic emissions reductions targets for both the Council and region should drive all the region’s planning – including the Long Term Plan (LTP) and Regional Land Transport Plan.

The long-term strategy for regional infrastructure must also be based on realistic emissions reductions targets so that the infrastructure supports a thriving low emissions economy, not business-as-usual.

We urge care with further indebtedness and increasing ratepayer liabilities. GWRC seem to be assuming a business-as-usual future, rather than anticipating increasing climate damage to infrastructure and rising insurance claims on the demand side – and on the supply side, failing to appreciate that global climate changes may have a greater impact on our economy (and therefore ratepayer base) than climate damaged regional infrastructure costs.

Sharing the impact of climate changes across the region, especially protecting the most vulnerable households, may also absorb an increasing proportion of rates. For all these reasons, OraTaiao cautions GWRC about increasing debt.

3. Which packages would you give priority to?

Overall comment

We found this question difficult to answer as almost all of these packages are high priority, important in different ways and overlapping. The temptation is to tick every package as ‘1’ – especially when there is no background analysis supplied on the risks and costs to health, communities and wellbeing from entirely stopping one package in favour of another. Unbundling the packages and asking about specific proposals (with supporting information) would have been better. Then the marginal benefits and costs of incremental changes to specific programmes could be assessed (Programme Budgeting Marginal Analysis (PBMA) <http://www.medicine.ox.ac.uk/bandolier/booth/glossary/PBMA.html>). As it stands, public feedback on question 3 may be unhelpful.

Although almost all the packages are top priority, we have attempted to order the packages (below) for the reasons outlined below this list.

Indicate (by selecting the number) the priority you think is right for each of the six packages.

1 = lowest priority 5 = highest priority

Public transport infrastructure	2
Protecting communities from flood risks	4
Getting more people using public transport	1
Getting out and about (walking, cycling, running, scootering)	1
Keeping the water flowing	5
Environment and water quality	3

Packages 3 & 4: Realistic increased targets for using legs or sharing transport

Getting more people using their legs or sharing public transport are both 'very top priority'. We urge the Council to set realistic targets which reflect the need for regional greenhouse gas emissions to rapidly reduce over the life of the Long Term Plan and for land transport to become much closer to zero emissions over that time.

The Regional Land Transport Plan aim to increase journey to work trips for walking and cycling by 17% by 2025 is clearly inadequate, when cycling increased in Wellington city by 21% just in the last twelve months – and that's with mostly just talking about better infrastructure, let alone building it.

What about a target of 30% personal travel powered by legs by 2025 – walking, cycling, running, scootering and skateboarding – with a strong emphasis on increasing the activity levels of children and young people integrated into daily travel? Likewise a target for 2025 for more than half of personal travel is by shared transport, whether public transport, carpooling or car share?

Package 1: Public transport infrastructure

Setting shared and active transport targets that are actually realistic in reflecting climate and health needs pushes the need for better public transport infrastructure (and policies such as reducing fares to induce demand as a cost-neutral approach) which we have marked as the second priority.

This public transport must become 100% renewably-powered as opportunities arise for replacement – and have the capacity to manage substantially increased demand. Given the urgency to reduce emissions, it makes no sense to replace a bus fleet in 2017 with diesel buses, even as hybrids, nor to dispose of Wellington's current renewably-powered trolley buses. If there is any doubt about the ability to secure renewably-powered public transport infrastructure by 2017, it would probably be better to extend the contract by a year or two, to make the right transition, rather than locking in limited infrastructure for another decade or so. The right public transport investment is critical.

Ambitious uptake targets for public transport also mean the Council must actively oppose policies, programmes and funding that will increase private transport uptake expansion (which undermines the viability and diversity of public transport) and demand that roading funding be diverted to public and active transport infrastructure as top priority, not remain a poor cousin of private transport spend.

The best way to meet the needs of a diverse range of transport users is to increase public and active transport provision, because this also decongests the roads for those journeys where a private car makes the most sense (including additional wheelchair hoists in taxi vans which we strongly support). Conversely increasing private transport provision simply increases private transport use (and eventually congestion), and reduces public transport demand.

Package 6: Environment and water quality

We have listed this as priority three for climate mitigation reasons, although it is arguably also a top priority as clean water is fundamental to human health and survival. Water allocation needs to be fair and realistic in the face of increasing droughts in some areas. Farming more sustainably will help reduce water demand and water pollution as well as reducing powerful greenhouse gas emissions.

We also support growing Enviroschools – and let's work together towards actually creating the fairer, more sustainable future that we are encouraging our children to expect. That must be at the heart of the Long Term Plan.

Predator control is important to protect our forest's capacity to sequester emissions – we need to both regenerate and protect existing indigenous forest, plus grow more plantation forest on marginal farming land which the Emissions Trading Scheme has failed to do at our cost over the decade.

Package 2: Protecting communities from flood risk

This is priority four as climate adaptation because it seems easier for local government to recognise climate adaptation issues – well ahead of climate mitigation requirements that would increase the likelihood of being able to adapt.

We emphasise the importance of planning for flood risk using the best most up-to-date information – which may include a range of scenarios depending on the global mitigation pathway over the next decade or so. For example, sea level risk may be more likely to be in the vicinity of 1.5 metres by 2100, or metres higher. How much ratepayer funds to spend now on flood protection depends somewhat on how much more expenditure is projected over the decades to come.

If the rest of the world follows NZ's track record in reducing emissions since 1990, it would be best to plan for the worst possible scenario. However, Intended Nationally Determined Contributions (INDCs) are being submitted now leading up to the international climate negotiations in Paris this year (UNFCCC 21st Conference of the Parties (COP21)), and hopefully these will bring us closer to keeping within the agreed limit of 2°C of global warming – and hopefully NZ will come under more pressure to do our fair share.

We hope that GWRC is considering realistic scenarios for flood risk, including the possibility of retreat and whether ratepayers should share some of the costs of repair, repeated repair, rising insurance costs and possibly retreat, with individual property owners in the most affected areas?

Package 5: Keeping the water flowing

We have listed this as the lowest priority as there is insufficient information to assess the value of the proposed cross-harbour pipeline for emergencies. Increasing the distribution of household rainwater collection tanks throughout the region for example, may be a more cost-effective solution with multiple gains.

Rainwater can be routinely used for gardens (as well as easing the pressure of droughts which will become more frequent), and can be immediately accessed in neighbourhoods in the event of a variety of emergencies, even if pipes are broken or roads blocked. Widespread distribution of rainwater tanks allows for resilience despite some damage, for example, in the event of a serious earthquake.

Supplementing the region's water needs with rain water tanks also reduces the costs of the current centrally distributed water system – which uses electricity to pump clean drinking quality water around the region for multiple uses including watering gardens, flushing toilets and cleaning cars. By increasingly using rainwater supplies for domestic use, residents will also be more aware of the need to conserve water and use it appropriately.

The statement in the draft LTP that *'we'll boost the self-insurance plan as this is more cost-effective than paying for commercial insurance'* requires more explanation before we can comment.

4. Do you think there are any other major issues GWRC should be focussing on for the next 10 years apart from those identified?

Climate change – including mitigation, adaptation and ensuring a just transition to a low emissions economy by protecting the most vulnerable households – is the major issue for GWRC for the next 10 years.

5. Are there any other comments you wish to make about our proposals for the next 10 years?

We look forward to presenting our views to the Council, including elaborating on this submission. We hope our views are seen as constructive, contributing towards a shared concern for the future well-being of this region. Thank you for the opportunity for feedback.