















26 March 2021

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Tēnā koe

Bay of Plenty Region Local Authorities Joint Submission -Climate Action for Aotearoa: He Pou a Rangi Climate Change Commission's first package of advice

Thank you for the opportunity to submit on the He Pou a Rangi Climate Change Commission's first package of advice on Climate Action for Aotearoa.

This is a joint submission from the following local authorities of the Bay of Plenty Region:

- Bay of Plenty Regional Council;
- Kawerau District Council;
- Ōpōtiki District Council;
- · Rotorua Lakes Council;
- Tauranga City Council;
- Taupō District Council;
- Western Bay of Plenty District Council; and
- Whakatāne District Council.

For matters relating to this submission, please contact Stephen Lamb, Manager Environmental Strategy, by email Stephen.Lamb@boprc.govt.nz or phone 0800 884 881 ext. 9327.

Toi Moana Bay of Plenty context

The Bay of Plenty is on the east coast of the North Island of New Zealand. The region takes in the full sweep of the coastline from the tip of East Cape to Waihī Beach. It encompasses significant river catchments and the Rotorua Lakes. Over 300,000 people live in the Bay of Plenty. The region has a rich cultural dynamic: 26 percent of the population identifies as Māori, with 39 iwi, and more than 260 hapū. A third of land in the region is owned by Māori under various forms of tenure: the vast majority of this land is currently in exotic forestry land use, or native trees.

Rapid population growth trends present a range of climate change challenges for urban Bay of Plenty. Significant urban development pressures occur in places, a lack of housing supply is an issue across the region, while natural hazard considerations and transport issues add complexity. The high growth rates being experienced in some areas comes with a number of challenges and competing priorities – as do situations where populations are static or diminishing. Economic aspirations differ across the region as districts/cities look to achieve their development potential.

The Bay of Plenty local authorities recognise their role in leading, supporting and facilitating the region's transition to a low emissions, climate resilient society. Bay of Plenty Regional Council, Rotorua Lakes Council and Whakatāne District Council have recently adopted Climate Action Plans, which outline targets and actions for emissions reductions and adaptation, internally and

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within their communities. Several of the councils have also established their own organisational emissions measurement and reporting processes.

High level position

The Local Authorities welcome the Commission's draft advice and applaud that this kaupapa, which is significant for all New Zealanders, is being moved forward. We support the general intent and direction of the recommendations, recognising the need for urgent action at all levels of government to respond to the climate change crisis and help to address carbon emissions.

We recognise the importance of central and local government working together to deliver our national emission reduction targets, and the consequent need for clarity around roles and responsibilities. Whilst we appreciate that the Commission's mandate is to provide high level policy direction, our view is that the Commission's advice could be strengthened through providing more specifics around the policy aspects, particularly in relation to existing and proposed legislation, the balance between national and local policies, and overall timelines.

A summary of our collective view is as follows:

- We strongly support the Commission's focus on gross emissions reductions and decarbonising sources of long-lived gas emissions where possible.
- We agree that Central and Local Government working in partnership is essential to
 delivering the necessary emissions reductions. However, we ask the Commission to
 provide greater clarity and specificity around roles and responsibilities, particularly around
 where they see a role for strong national direction (e.g. to enabling congestion charging)
 versus areas where local or regional policy is likely to be more effective.
- We support a multisector approach to emissions reductions and seek further
 clarification from the Commission around how they view the contribution of current
 legislation and forthcoming legislative reforms (e.g. RMA) to the overall emissions
 reduction plan. A high level timeline of the overall policy direction proposed by the
 Commission alongside the current legislative landscape would be helpful to understand
 the interaction between different sectors and policies.
- We would like to see a greater focus on behaviour change and how we can facilitate the significant shifts required of our communities, as we view this as being central to achieving and 'locking in' the proposed emissions reductions. We suggest that the Commission's advice could be strengthened in this area.
- We suggest a stronger focus on reducing overall levels of consumption: transitioning
 to a low carbon society is not just about replacing one technology with another lower
 carbon version it also needs to consider whether we need the product or technology in
 the first place.
- Transport and urban planning is a key focus for delivering emissions reduction. We suggest the inter-dependency between these areas need to be expanded on in the Commission's advice, with more detail around what will be required to bring about the necessary changes to our urban centres both in terms of future planning and transforming our existing centres. In our view the importance of urban/city design being part of the climate change solution means that it should be a standalone section to be addressed by the Commission.
- We support the Commission's focus on an equitable, inclusive and well-planned climate transition. Whilst we acknowledge that the Commission's advice is specifically focused on emissions reductions, we suggest the climate transition and associated transition plans should factor in both mitigation and adaptation more explicitly, in line with the Commission's principle 6 'Increase resilience to climate impacts'.

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Local Government in the Bay of Plenty is keen and energised to work with the Climate Change Commission as the Commission continues its mahi and confronts a number of challenging issues.

Nāku noa, nā

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