

# Nelson City Council PPC 28 - Submission to RMA Commissioners

## Peter Taylor representing Save the Maitai Inc

- I am a founding member of Save the Maitai Inc
- I am a registered osteopath and registered psychotherapist
- I am a former staff member of the Otago Regional Council where I was Director of Strategic Communication and Education for 12 years
- I am a former Head of the School of Social Sciences at NMIT
- I have been a regular user of the Maitai walkways, swimming holes and cycle tracks for 25 years
- I regularly refer patients with physical injuries or pain and those in psychological distress to use this area for their rehabilitation.
- I highly value this area's deep amenity and recreational values
- I have read much of the information lodged in relation to PPC28, and I have looked at the most recent Structure Plan in Mr Milne's evidence. I understand in a general sense what type of development is proposed.

# The failure of the PPC28 to account for New Zealand's climate change objectives and regulations



# PPC28 -No Climate Change GHG emission assessment?

- By failing to provide any assessment of the greenhouse gas emissions known to be produced by stand alone satellite greenfield subdivisions of the scale proposed, PPC28 omits to account for local and international climate emergency declarations, NZ Government regulations or current construction expert recommendations e.g. BRANZ).
- PPC28 does not provide evidence demonstrating that GHG emissions will be reduced to meet current NZ and IPCC decarbonisation expectations by using climate friendly construction materials and land modification methods.

# As part of global efforts to reduce greenhouse gas emissions, New Zealand has made various commitments including:

- The Paris Agreement – a UN initiative committed NZ to achieving a 50% reduction of our 2005 greenhouse gas emissions by 2030. The agreement also aims to achieve net-zero carbon emissions between 2050 and 2100.
- The Climate Change Response Act 2002 – NZ law amended in 2019 with a commitment to reduce net emissions of greenhouse gases to zero by 2050.

## **Building construction primarily contributes to climate change impacts through the :**

- greenhouse gas emissions from the extraction, processing, transport and installation of building materials and their maintenance
- effects and emissions from urban and landscape design factors
- energy they use when the building is occupied

# National Policy Statement on Urban Development

## **Objective 8**

New Zealand's urban environments :

Support reductions in greenhouse gas emissions; and are resilient to current and future effects of climate change.

## **Policy 1**

Planning decisions contribute to well functioning urban environments that as a minimum:

Support reductions in greenhouse gas emissions and are resilient

# Green house gas emissions from “island” greenfield developments such as PPC28

- Low density traffic from car-centric location and design
- High-emission land modifications
- High- emission construction
- Diffuse pollution of waterways
- Loss of soil carbon
- Massive new expensive infrastructure development needed
- Inefficient single level sectioned housing
- Social isolation from community amenities and social services with no access to public transport encourages car use.

# PPC28 fails to provide information allowing an assessment of its effect on New Zealand's green house gas emission targets

- PPC28 does not adequately address the responsibility of the applicants to demonstrate that they can plan and execute land development and construction methods, and use construction materials that make a measurable commitment to meeting New Zealand's Climate Change greenhouse gas emission reduction objectives.
- The PPC28 makes no reference to any of the following activities that would give confidence the development was not going to be a gross producer of carbon emissions

# Govt Plan for Reducing emissions from construction

Chapter 13 of the Government's first Emissions Reduction Plan seeks to improve building and construction practices to substantially reduce greenhouse gas emissions from construction materials and techniques used in New Zealand.

The plan says that the building and construction sector produces over 15% of our domestic greenhouse gas emissions. This is an underestimate of the total impact as it does not include the emissions produced from the manufacture of imported building materials.

Up to half of all waste in Aotearoa is made up of construction and demolition waste, with 20 per cent of this waste going to municipal landfill and 80 per cent to non-municipal landfills.

Source: <https://environment.govt.nz/publications/aotearoa-new-zealands-first-emissions-reduction-plan/>

# BRANZ - A Transition to a zero-carbon built environment

The building industry has big implications for Climate change. It has been estimated that buildings are directly and indirectly responsible for up to 20% of New Zealand's greenhouse gas emissions.

The BRANZ programme aims that by 2050, the building and construction industry will deliver net-zero carbon buildings in an affordable way.

The BRANZ provides research support for an industry-led transition to a zero-carbon built environment through:

- ...decarbonising across the whole building life cycle

- ...encouraging building industry leadership and decision making to manage climate change mitigation practices throughout the construction process.

# PPC28 does not account for emissions caused by low density building and its proposed construction methods and does not demonstrate participation in greenhouse gas reduction programmes

- A typical new Kiwi home emits five times as much carbon dioxide as it can afford to, if the world is to stay inside 1.5C warming
- A recent New Zealand study focussing on detached houses identified housing must shrink its carbon footprint by 80 per cent to do its bit to meet the Paris climate accord.

- A science-based approach to setting climate targets for buildings: The case of a New Zealand detached house
- Sarah J.McLarenabDavidDowdellacRomanJaquesc

# Isolated urban areas with poor public transport increase carbon emissions

- The key to decarbonisation is the ability to live well with minimal private transport.
- PPC28 proposes as an isolated stand-alone housing suburb which is unlikely to attract public transport options.
- Residents will largely travel by motor-vehicle, offsetting carbon emissions that might be saved by a cycleway
- Parts of Enner Glynn and Stoke are similar distance from central Nelson and are connected by a pleasant sealed cycleway entirely separate from the road. This has not resulted on noticeable reductions to motor-vehicle use.

# Effects of poor Public transport services raises emissions

- Currently the closest bus route servicing PPC28 would collect passengers at Nelson Central School on Nile St , not within walking distance to PPC28
- Passengers would have to drive there to catch a bus. It is already a congested area during school drop off and pick up times with very limited parking used also by NMIT staff and students.
- Bus service times and routes are very limited - to get to facilities commonly used e.g. . Hospital; after hours medical or Saxton Field sports complex at least two bus services would have to be used.
- It is unlikely PPC28 will receive good enough public transport to offset emissions from vehicle use . About 6300 extra vehicle movement per day will substantially increase GHG emissions and degrade local air quality

# BRANZ research into decarbonising the construction industry

- BRANZ recent acclaimed research into New Zealand's building practices identified that the construction sector would have to decarbonise by around 85% in order to be compatible with the 1.5 degree global warming limit.
- Monitoring the recent surge in building Monitoring activity this was modified to 100%
- Source: Resilienz N Z Ltd submission to TDC on the 2020 Future Development Strategy

# Are there GHG emission solutions? (1)

- Applicants refocus their activities by acquiring more centrally located land assets and supporting public advice (2022 FDS submissions) and NCC wishes for intensification of more central areas on Nelson.
- PPC28 commits to providing a Climate Change GHG emission reduction plan identifying materials, building practices and land modification processes they will use to make a measurable contribution to NZ's GHG emissions targets.
- This plan and its implementation would be approved audited and by BRANZ or other independent agency qualified to do so

## Are there solutions? (2)

- Applicants build less housing using the current zoning permits and establish a larger carbon credit green zone, with extensive tree planting, regeneration.
- Applicants pursue and practically support public and political interest in greening the Kaka Valley and integrating it into Nelsons first Regional Park – Maitahi.