AGENDA

WHAKATĀNE District Council
Kia Whakatāne au i ahau

Environment, Energy, and Resilience Committee

Te Komiti Rautaki me ngā Kaupapa Here

Thursday, 7 November 2024

Rāpare, 7 Whiringa-ā-rangi 2024

Totara Room, Whakatāne District Council
14 Commerce Street, Whakatāne
Commencing at: 9:00 am

Chief Executive: Steven Perdia
Publication Date: 1 November 2024

Live Streaming the Meeting - *Ka whakapāho mataora te hui*

PLEASE NOTE
The **public section** of this meeting will be Live Streamed via YouTube in real time. The live stream link will be available via Council's website.
All care will be taken to maintain your privacy however, as a visitor in the public gallery, your presence may be recorded. By remaining in the public gallery, it is understood your consent is given if your image is inadvertently broadcast.
The opinions or statements expressed during a meeting by individuals are their own, and they do not necessarily reflect the views of the Whakatāne District Council. Council thus disclaims any liability with regard to said opinions or statements.

A Membership - *Mematanga*

Mayor Dr Victor Luca - Chairperson
Councillor Nándor Tánczos - Deputy Chairperson
Deputy Mayor Lesley Immink
Councillor Toni Boynton
Councillor Gavin Dennis
Councillor Andrew Iles
Councillor Wilson James
Councillor Julie Jukes
Councillor Tu O'Brien
Councillor John Pullar
Councillor Ngapera Rangiaho

B Delegations to the Environment, Energy and Resilience Committee - *Tuku Mahi ki te Komiti*

1. To oversee development of strategies and plans that reflect and implement the Council's vision.
2. To oversee the development of strategies, plans and programmes that protect and restore the District's natural environment, resources, and ecology.
3. To monitor and advise on the strategy, policies and direction on the impact of climate change on the District.
4. To improve community resilience to environmental threats.

Specific functions and delegations:

Develop the Long-term Plan and Annual Plan and determine the form and extent of public consultation methods to be employed (Note1: the Council cannot delegate to a Committee the adoption of the Long-term Plan and Annual Plan, Note2: the Council retains for itself the strategic direction setting responsibility of the Long-term Plan process).

a. Develop, and monitor implementation of, Council's Climate Change Strategy and programme.
b. Monitor the development of associated Central Government Reform programmes.
c. Develop and review associated bylaws (Note: only Council has the power to make a bylaw).
d. Develop, review and approve associated strategies, policies and plans (Note: only Council has the power to adopt policies associated with the Long-term Plan).
e. Develop a proposed plan or a change to a district plan under the Resource Management Act 1991.
f. Climate change science, impact and strategy overview - mitigation, adaptation and resilience.
g. Foster community environmental and climate change understanding.

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1 Meeting Notices - *Ngā Pānui o te hui*

1. Live Streaming

The Whakatāne District Council livestreams Council and Standing Committee meetings held in Tōtara Room, within the Council building. The webcast will live stream directly to Council's YouTube channel in real time. The purpose of streaming meetings live is to encourage transparency of Council meetings.

By remaining in the public gallery, it is understood your consent has been given if your presence is inadvertently broadcast.

Please be aware the microphones in Totara Room are sensitive to noise, so please remain quiet throughout the meeting unless asked to speak.

2. Health and Safety

In case of an emergency, please follow the building wardens or make your way to the nearest exit. The meeting point is located at Peace Park on Boon Street.

Bathroom facilities are located opposite the Chambers Foyer entrance (the entrance off Margaret Mahy Court).

3. Other

2 Apologies - *Te hunga kāore i tae*

At the time of compiling the agenda, an apology was received from Councilor J Pullar.

3 Acknowledgements / Tributes - *Ngā Mihimihi*

An opportunity for members to recognise achievements, to notify of events, or to pay tribute to an occasion of importance.

4 Conflicts of Interest - *Ngākau kōnatunatu*

The Elected Member Register of Interest is available on the Whakatāne District Council website. If you wish to view the information, please click this Register Link.

Members are reminded of the need to stand aside from decision making when a conflict arises between their role as an elected member and any private or other external interests they might have. Elected Members are also reminded to update their register of interests when changes occur.

1. Financial Conflict

- Members present must declare any direct or indirect financial interest that they hold in any matter being discussed at the meeting, other than an interest that they hold in common with the public.
- Members cannot take part in the discussion, nor can they vote on any matter in which they have a direct or indirect financial interest, unless with an approved exception.
- Members with a financial interest should physically withdraw themselves from the table. If the meeting is public excluded, members should leave the room.

2. Non-Financial Conflict

- If a member considers that they have a non-financial conflict of interest in a matter they must not take part in the discussions about that matter or any subsequent vote.
- Members with a non-financial interest must leave the table when the matter is considered but are not required to leave the room.

5 Public Participation- *Wānanga Tūmatanui*

5.1 Public Forum - *Wānanga Tūmatanui*

The Committee has set aside 30 minutes for members of the public to speak in the public forum at the commencement of each meeting. Each speaker during the forum may speak for five minutes. Permission of the Chairperson is required for any person wishing to speak during the public forum.

With the permission of the Chairperson, Elected members may ask questions of speakers. Questions are to be confined to obtaining information or clarification on matters raised by a speaker.

5.2 Deputations - *Nga Whakapuaki Whaitake*

A deputation enables a person, group or organisation to make a presentation to Committee on a matter or matters covered by their terms of reference. Deputations should be approved by the Chairperson, or an official with delegated authority, five working days before the meeting. Deputations may be heard at the commencement of the meeting or at the time that the relevant agenda item is being considered. No more than two speakers can speak on behalf of an organisation's deputation. Speakers can speak for up to 5 minutes, or with the permission of the Chairperson, a longer timeframe may be allocated.

With the permission of the Chairperson, Elected members may ask questions of speakers. Questions are to be confined to obtaining information or clarification on matters raised by the deputation.

1. Planetary Accounting

Mayor Luca has allowed an extended timeframe for Planetary Accounting within this section of the meeting. The abstract is to provide a deeper understanding of the Planetary Boundaries and the importance of staying within environmental limits. The session includes the following:

- An introduction to the Planetary Accounting Framework.
- Overview of Planetary Accounting for Regions and Cities with two case studies.
- The relevance of Planetary Boundaries framework and Planetary Accounting to the Whakatane District Council's goals.

Presenter - Kate Meyer

Kate led the establishment of Planetary Accounting, a scientifically peer-reviewed framework that operationalises the Planetary Boundaries. She is the founder and CEO of the Planetary Accounting Network (PAN), a not-for-profit that helps people and organisation to use the Planetary Boundaries for decision-making. PAN's initiatives range from Doughnut Economics applications at a city scale, to nature-related impact assessments and the establishment of science-aligned targets across the Planetary Boundaries, to Planetary Facts assessments of products (think nutritional facts for sustainability). She is also the founder and CEO of tech firm Planetary Insights which digitises Planetary Accounting solutions. Over her career Kate has led many environmental award-winning projects and taken on senior leadership roles such as Sustainability Director at Beca – leading their international sustainability practise. Her work in Planetary Accounting has been acknowledged in platforms from TedX to the Deloitte Top200 Sustainability Leadership Awards to Auckland University's 40Under40 awards.

Presenter - Sue Lund

Sue lives in the Bay of Plenty and joined PAN after 25 years' experience in legal and business roles in financial services in New Zealand, Australia and the United Kingdom. She spent the last 10 years working with sustainable finance, ESG, responsible investing products and climate-related disclosures. Sue is passionate about working to address the world's most pressing environmental challenges and accelerating change.

6 Confirmation of Minutes - *Te whakaaetanga o ngā meneti o te hui*

The minutes from the Committee meeting held Thursday 8 August 2024 can be viewed via the Council website.

Click on the link below in order to view the 'unconfirmed minutes':

- Unconfirmed minutes of the Environment, Energy and Resilience Committee - 8 August 2024

7 Reports - *Ngā Pūrongo*

7.1 Eastern Bay of Plenty Spatial Plan Project Update

To:	**Environment, Energy and Resilience Committee**
Date:	**Thursday, 7 November 2024**
Author:	**N Woodley – Manager Policy, Planning and Consents**
Reference:	**A2776466**

1. Reason for the report - *Te Take mō tēnei rīpoata*

The purpose of this report is to provide an update on the Eastern Bay of Plenty Spatial Plan project.

2. Recommendation- *Tohutohu akiaki*

THAT the Eastern Bay of Plenty Spatial Plan Project Update Report be **received**.

3. Background - *He tirohanga whakamuri*

3.1. Eastern Bay of Plenty Spatial Plan

Spatial plans are about the places we live in and how we want them to be for our future generations.

When completed, they provide a roadmap for our future spaces and places and an evidence base and direction to align other strategies and planning processes towards common outcomes.

In late 2022, Local Authorities and Iwi Authorities in the Eastern Bay of Plenty began to work collaboratively with Government agencies to scope and develop a spatial plan for the sub-region. The intention is for a plan that reflects the partners aspirations for our rohe, informs Council Long Term Plan processes, and Government infrastructure investment decisions.

3.2. Project Partnerships

The Spatial Plan will influence decisions that impact a wide range of our communities, in the short-term to long-term. These communities have differing needs and aspirations, and the Spatial Plan is being developed in an inclusive and collaborative manner.

Working in genuine partnership with tangata whenua is particularly important at all stages of the spatial planning process. The project intends to weave the aspirations of Iwi into the plan and ensure all decision-making forums have Iwi representation and participation. This is critical to the success of the project.

The Spatial Plan will also have implications for Government agencies that deliver infrastructure, housing development and other critical services (such as health and education) that will be needed to meet the growth needs across the Eastern Bay of Plenty and deliver on partner aspirations. To

ensure that the project and funding implications arising from the Spatial Plan can be implemented, the Spatial Plan is being developed collaboratively with Government agencies including Waka Kotahi, the Ministry of Housing and Urban Development (MHUD), Kāinga Ora and Ministry for Education.

3.3. Last update reports to Council

June 2023: addressed the project structure, inaugural meeting of the Project Governance Group, and provided an update on Tangata whenua engagement, communications/engagement, and technical work.

August 2023: addressed an update on the set up for the Project Governance Group, Tangata whenua engagement, communications/engagement, and technical work.

November 2023: addressed an update on communications/engagement, a review of the project delivery, an update on the Project Leadership Group/the Project Governance Group meetings, technical work update and a programme update.

February 2024: addressed legislative reform, a review of the project delivery, an update on the Project Leadership Group/the Project Governance Group meetings, technical work update and a programme update.

May 2024: update on the Project Leadership Group/the Project Governance Group meetings, the joint Project Leadership Group/Project Governance Group workshop in June 2024, Council workshops planned for July/August 2024 and an update on work in progress and the programme.

August 2024: update on the communications and engagement plan, delivery approach, tangata whenua engagement, Economic Development Strategy, Project Leadership Group, Project Governance Group and workshop with Councillors.

October 2024: Council endorsed changes to the project governance framework, including a Terms of Reference for the Project Governance Group.

4. Issue/subject - *Kaupapa*

4.1. Project Progress

The following activities have been progressed since the last update report to Council in August 2024.

4.1.1. Engagement

Public consultation has commenced and is being held from 14 October 2024 through to 17 November 2024. This is an opportunity to hear directly from our communities on their thoughts and aspirations for the future of the Eastern Bay of Plenty.

Our focus is on leveraging digital and traditional platforms for engagement followed up with face-to-face engagement, as follows:

- Digital and traditional media:

i. Mix of social media, paid media, print, radio, digital noticeboards, rates insert, Our Places website.
ii. StoryMap online narrative to explain the draft work visually.

iii. Encourage completion of online engagement questionnaire (Social Pinpoint platform).
iv. Face to face engagement as follows:

- Three key facilitated workshops with invited stakeholders, being a Joint School/Youth session, Community Board members session and Friends of our Places/Stakeholder session held across 29 and 30 October 2024. There are also similar workshops planned in Kawerau and Opotiki.
- A Sponsored BA5 event with the Eastern Bay Chamber of Commerce held on 30 October 2024.
- Focused Meetings: Smaller one-to-one meetings with selected stakeholder groups.
- Public open house events held in Awakeri, Matatā, Tāneatua, Murupara (joint event with Iwi Policy Hub), and the Whakatane township held from 31 October 2024-7 November 2024.

Following the consultation period, we will then collate all feedback received and hear from any submitters that wish to be heard at the Project Governance Group Meeting on 2 and 3 December 2024, we will then consider how to input the feedback received directly into the project, (which we will receive guidance and direction on from the Project Governance Group at their next meeting on 18 December 2024).

4.1.2. Tangata Whenua Engagement

A key aspect of this spatial planning partnership is the role of tangata whenua representatives, as full partners in the process. This is critical to ensure the voice of Iwi partners, including their vision and aspirations, are well articulated in the plan. This also recognises that Māori make up a significant percentage of the population and are amongst the most significant landowners in terms of the scale and location across the Eastern Bay.

The Whakatāne District Collaborative Iwi Policy Hub is up and running and providing additional support for spatial planning to Ngāti Awa, Ngāti Manawa, Ngāti Whare and Ngāti Rangitihi Iwi, in particular. This is a significant and positive input to the project and is being resourced by the Better Off Funding. The Policy Hub and Project Team are working closely to integrate scope and deliverables between projects, to create efficiency of engagement outcomes for Tangata whenua.

The Project Team are working directly with the Whakatāne District Collaborative Iwi Policy Hub to engage with Iwi in our district, while Ōpōtiki District Council and Kawerau District Council are engaging directly with Iwi in their areas.

We have a joint engagement event being the Murupara Open House in November 2024 with the Whakatāne District Collaborative Iwi Policy Hub. Whakatāne District Collaborative Iwi Policy Hub are also running other engagement events with Iwi across September-November 2024.

4.1.3. Economic Development Strategy

The Economic Development Strategy for the Eastern Bay and the Spatial Plan Project are well aligned. Work has been shared between projects to the benefit of both. The timing of the Economic Development Strategy being undertaken over the last several months presented a key opportunity for the Spatial Plan Project to incorporate the strategic economic direction and priorities defined through that project, as well as benefiting from the stakeholder and governance discussions undertaken.

4.1.4. Project Governance Group

The Project Governance Group includes District Councils Mayors, the Eastern Bay of Plenty General Constituency Regional Councillor, Chairs of Iwi Authorities, senior Government representatives, and an independent chairperson. Meetings have included:

- 19 December 2023 Meeting: where we presented all work undertaken to date and sought direction on measures of success for the outcomes sought through this project, we also had a meaningful discussion around what this would mean for all those involved in the project.
- 23 May 2024 Meeting: where we presented an update of the project work, the agenda for the joint June workshop along with introducing the new chair of the group, Vaughan Payne.
- 24 June Meeting: Joint meeting with the Project Governance Group where we reviewed options to change the settlement pattern.
- The next meeting will be on 2 and 3 December 2024 where the Project Governance Group will receive presentations from interested organisations or members of the public and make decisions on how to incorporate feedback from consultation.
- A further meeting will take place on 18 December 2024 to discuss the next steps following on from consultation and how we incorporate the feedback we have received through the consultation process.

4.2. Programme Update

The general programme includes the following tasks by calendar year:

2024

- Establish seconded team;
- Confirm sub-regional economic development opportunities;
- Community engagement on priorities and options;
- Select a growth option and transformative outcomes for wellbeing;
- Begin to draft an implementation programme.

2025

- Writing the spatial plan and implementation programme;
- Consult on final draft document;
- Final approvals by Councils and Iwi authorities.

4.3. Technical work

Technical Working Group activities have been focused on the following project elements:

Completed

- Population and Land Needs Assessment;
- Three Waters Preliminary Assessment;
- Friends Of Our Places – group established and first event held;
- Project website;
- Changes to mapping to reflect the change to a sub-regional scale for the project;

- Project Plan refresh with respect to formed seconded team and revised programme;
- Transport Assessment;
- Engagement Approach;
- Areas to Protect and Avoid Report and Mapping at Sub Regional Scale;
- Draft scenarios and development options report.

Currently underway

- Consultation and related reporting;
- Working with Iwi Policy Hub on a sub-regional perspective of Iwi aspirations;
- Working with the Economic Development Strategy on economic development priorities;
- Three Waters – Options Analysis.

5. Significance and Engagement Assessment - *Aromatawai Pāhekoheko*

5.1. Assessment of Significance

The decisions and matters of this specific report are assessed to be of low significance in accordance with the Council's Significance and Engagement Policy. However, this report is part of a broader process that is, or may be in future, assessed to be of moderate or high significance.

5.2. Engagement and community views

Engagement with the project partners, including Eastern Bay of Plenty Iwi is underway, and this process will confirm Iwi partners' level of interest and involvement at all levels of the project and enabling this to be realised.

Wider community engagement in this project will be facilitated through the project's communications and engagement activities.

6. Considerations - *Whai Whakaaro*

6.1. Financial/budget considerations

The project is being funded through a blend of Council sources and Better off Funding. The Project Plan approved by the Project Leadership Group in April 2023 presented an updated financial position which is summarised below.

6.1.1. Cost to date

From inception to September 2024, project costs were approximately $1,098,900. This has been spent on the following services: scenarios development, demographics and land needs research, public and stakeholder engagement activities, Iwi engagement activities, project management, project director, project coordinator, quality assurance, project governance support (including an interim independent chairperson for the governance group), three waters assessment, transport assessment, communication and engagement, and the appointment and role of independent chair of the Project Governance and Project Leadership Groups.

6.1.2. Funding sources

Project costs incurred by Whakatāne District Council, as per the table below, are funded within the Resource Management - Policy activity and are included in the 2021-31 Long Term Plan. Both Kawerau and Whakatāne District Councils have had a Better Off Funding allocation approved to support the acceleration of this project to align with other critical planning workstreams.

Further funding from the Councils involved is likely to be forthcoming but is still being confirmed for the 2024-2025 financial year.

Partner	**Committed Funding**
Bay of Plenty Regional Council	$300,000
Whakatāne District Council	$400,000
Better off Funding-WDC	$200,000
Better off Funding-KDC	$120,000
Ōpōtiki District Council	$50,000
Total	**$1,070,000**

6.1.3. Forecast project cost

A delivery model that prioritises utilising Council resources has led to cost efficiencies. Project budgets have been approved through Council's Long Term Plans.

The project is relying also on the benefit of work being done in the sub-regional Economic Development Strategy, Iwi Policy Hub and other related projects to make the best use of work across Councils.

The expectation is that the project will work to the budget enabled through new Long Term Plan allocations, and apply seconded team resources to complete the work, whilst managing scope to meet available resources and skill requirements.

6.2. Strategic alignment

No inconsistencies with any of the Council's policies or plans have been identified in relation to this report.

6.3. Climate change assessment

Based on this climate change assessment, the decisions and matters of this report are assessed to have low climate change implications and considerations, in accordance with the Council's Climate Change Principles.

6.4. Risks

A summarised risk register and primary mitigations are noted below for higher project risks:

- A risk that the project is not fully funded means it cannot finish due to a funding shortfall and does not reach a suitable level of quality and partner expectations are not fulfilled. This is being mitigated by the seconded team structure. This is also being mitigated through a slowed down engagement process with project partners to enable sufficient time for fuller participation in the project and reliance on other projects like the Economic Development Strategy.
- A risk of misalignment of partner expectations (Council, Tangata whenua and Central Government) is being mitigated by working to ensure all partners and key stakeholders understand and agree on project principles, deliverables, timeframes, and accountabilities and being proactive in addressing where and when misalignment occurs. This is the value of a collaborative approach to the Plan.
- A risk that Iwi engagement is limited by their capacity to actively engage in the project is being mitigated by seeking technical and general support by engaging local expertise to support the project and to review different approaches to evolving the Eastern Bay settlement pattern, providing support from the technical working group for Iwi engaging in the project, and implementing the Collaborative Iwi Policy Hub support to alleviate capacity issues.
- A risk that implementation is unaffordable will be mitigated by quantifying implementation costs as part of the project, sequencing and staging activities, and using acceptable cost calculation methodologies.

7. Next steps - *Ahu whakamua*

(Note: Dates are subject to change)

i. Engagement and reporting from October to December 2024.
ii. Developing the Spatial Plan and Implementation Plan by approximately April 2025.
iii. Consultation on the draft plan around May 2025.
iv. Final approvals of the plan around August 2025.

7.2 Update on Resource Management Reform

To:	**Environment, Energy and Resilience Committee**
Date:	**Thursday, 7 November 2024**
Author:	**N Woodley / Manager Policy, Planning and Consents**
Authoriser:	**D Bewley / GM Development and Environment Services**
Reference:	**A2775934**

1. Reason for the report - *Te Take mō tēnei rīpoata*

To update the Environment, Energy and Resilience Committee on the ongoing Resource Management (RM) reform process and anticipated upcoming changes.

2. Recommendation - *Tohutohu akiaki*

THAT the Update on Resource Management Reform report, November 2024, be **received**.

3. Background - *He tirohanga whakamuri*

The Natural and Built Environment Act (NBEA) and Spatial Planning Act (SPA), enacted under the previous Labour Government, were repealed in late 2023 as part of the current Coalition Government's programme of resource management reform. This reform was described as occurring in three phases. Phase one was the repeal of the NBEA and SPA. Phase two involves amendments to the Resource Management Act (RMA), changes to national direction and policy instruments and the Fast-track Approvals Bill. The phase two reforms are still underway, with further changes expected through a second RMA Amendment Bill and a national direction package. The Government has also recently announced the phase three round of reforms, which involves replacing the RMA with two new Acts.

The further phase two reforms and phase three reforms are the subject of this report and are described in the following section.

4. Issue/subject – *Kaupapa*

4.1. Phase two reforms

A second RMA Amendment Bill is intended to be presented to Parliament by end of 2024 and if successful would be passed by mid-2025. This will be supported by a national direction package, which will focus on setting minimum requirements for activities. In total Phase Two will deliver seven new national directions and the amendment of 14 existing ones.

The remaining phase two reforms including the following areas of focus:

- Housing

Changes involve removing councils' ability to set minimum floor areas and balcony requirements, prohibiting the use of rural-urban boundaries, and introducing a new National Environmental Standard (NES) to permit Minor Residential Units without resource or building consent. The Whakatāne District Plan does set minimum floor areas for housing in the Mixed Use, Commercial, and Town Centre Zones and the Whakatāne Town Centre Precinct. The District Plan also has balcony requirements to ensure non-ground level occupants have access to outdoor living space in the General Residential, Medium Density Residential, Mixed Use, Commercial and Town Centre Zones, and for Papakāinga in a rural zone. The NES for Minor Residential Units is expected to be more permissive for these types of dwellings than the District Plan.

- Infrastructure and Energy
  Proposals include extending existing port coastal permits by 20 years, introducing a new National Policy Statement for Infrastructure, and making national direction changes for telecommunications and renewable energy such as eliminating consents for most new renewable energy infrastructure.
- Farming and Primary Sector
  Changes include replacing the National Policy Statement for Freshwater Management 2020, halting the rollout of Freshwater Farms Plan, and streamlining commercial forestry regulation to reduce council discretion on afforestation.
- Emergency and Natural Hazards
  A single natural hazard National Policy Statement will replace the proposed two-step national direction, guiding councils on identifying and managing natural hazards, along with changes to emergency response provisions.

Once the national direction is confirmed, Council will need to update the District Plan to give effect to them. In most cases this is not expected to require a plan change process under schedule 1 of the RMA (i.e. with submissions and a hearing), rather it is likely to be something that Council simply needs to update the District Plan to ensure it is consistent with the legislation and regulations (other sections of the RMA can require this, including section 44a for NESs and section 55 for NPSs). However there is potential for one or more plan changes depending on the detail and timing required to implement the changes. Council staff will continue to monitor these reforms and the details will be reported at future Environment, Energy and Resilience Committee meetings.

4.2. Phase three reforms

The phase three reforms that have been announced are based on the following core design features:

1. Two separate Acts – one for environmental effects management, and the other to enable urban development and infrastructure;
2. Narrowing the scope of the Resource Management system and managing “actual effects”;
3. Strengthening and clarifying environmental limits;
4. Greater use of national standards – to reduce the need for consent and simplify Council plans;
5. Spatial planning and simpler designation processes;
6. Combined regional and district plans;
7. Rapid, low-cost dispute resolution, potential for a new Planning Tribunal or similar;
8. Faster, cheaper processes and simpler litigation; and
9. Upholding Treaty of Waitangi settlements and Crown obligations.

The two new Acts will not be set as a hierarchy or with competing priorities but as a "double bottom line". The new Acts will be supported by a greater use of national directions to set minimum standards and activities permitted without resource consent. To support a standards based approach, the system will shift towards a focus on monitoring and compliance enforcement of the standards. It is likely to include standardised zoning, particularly for urban areas.

Requirements for spatial plans and combined regional and district plans were proposed under the previous government's RM reform framework, and this approach is replicated here. Designations will be widened to include ports and emergency service providers, and the default lapse date will double to 10 years.

The intention is to limit the scope of resource management and the effects it controls. Councils will not be able to ask for information or require a consent for any aspect of a development that has no material effects on the natural environment or another property owner, or if it is covered by and complies with another law, national standard, or is subject to a private agreement among all affected parties.

An Expert Advisory Group has been established who will develop a blueprint for replacing the RMA under the framework of the core design features. The aim is to have this blueprint by Christmas 2024, the bills to be before Parliament in 2025, and come into effect by mid-2026.

4.3. Phase three reforms and the Whakatāne District Plan review

The Whakatāne District Plan became operative in 2017. The RMA requires that plans be reviewed at least every 10 years. The project to review the District Plan is budgeted from 2025/26 in the Long Term Plan, however staff will be commencing the scoping of issues shortly.

While the details of the RM reforms are not yet known, the 2017 District Plan will need to be replaced. This replacement will need to reflect the new planning framework. I expect it will also need to reflect the Eastern Bay of Plenty Spatial Plan, the Whakatāne Climate Change Risk Assessment, as well as other known issues such improving natural hazard resilience.

As further detail on the RM reforms is provided, Council staff will use this to inform and report on our project planning for the forthcoming replacement of the 2017 District Plan.

5. Options analysis - *Ngā Kōwhiringa*

No options have been identified relating to the matters of this report.

6. Significance and Engagement Assessment - *Aromatawai Pāhekoheko*

6.1. Assessment of Significance

The decisions and matters of this specific report are assessed to be of low significance in accordance with the Council's Significance and Engagement Policy. However, this report is part of a broader process that is, or may be in future, assessed to be of high significance.

6.2. Engagement and community views

No decisions are being sought on this matter, and while it is part of a broader process that may in future be assessed to be of higher significance, the matter is not currently of a nature or significance that requires public engagement.

7. Considerations - *Whai Whakaaro*

7.1. Financial/budget considerations

There are no budget considerations associated with the recommendations of this report.

7.2. Strategic alignment

No inconsistencies with any of the Council's policies or plans have been identified in relation to this report.

7.3. Climate change assessment

- Based on this climate change assessment, the decisions and matters of this report are assessed to have low climate change implications and considerations, in accordance with the Council's Climate Change Principles.

7.4. Risks

There are no known risks associated with the matters of this report.

8. Next steps - *Ahu whakamua*

Council staff will continue to monitor the RM reforms and will provide updates to future EER Committee meetings. There are likely to be opportunities to make submissions throughout this process.

7.3 Updated EER Final Six Monthly Climate change report Jan-June 2024

To:	**Environment, Energy and Resilience Committee**
Date:	**Thursday, 7 November 2024**
Author:	**G Mischefski-Gray / Strategic Policy Analyst**
Authoriser:	**L Woolsey / Acting GM Strategy and Transformation**

1. Reason for the report - *Te Take mō tēnei rīpoata*

The purpose of this report is to provide the Environment, Energy and Resilience Committee with an update on the annual result of the Council's Greenhouse Gas emissions inventory certified by a Toitū audit for July 2023 to June 2024. The audit was certified on the 8th of October 2024.

Secondly, this report includes the progress made towards the targets and actions outlined in Council's Climate Change Strategy 2020-2023. This is the final report relating to this strategy which has now been replaced by the Climate Change Strategy 2024-27 (Climate Pathway).

2. Recommendations - *Tohutohu akiaki*

1. THAT the six-monthly January to June 2024 Climate Change Report be **received**; and
2. THAT the 2023-2024 Toitū Audited Greenhouse Gas Inventory and Management Report be **received.** (Appendix 1); and
3. THAT the EER committee **note** the increase of 10% in Whakatane District Councils carbon emissions for 2023-24 which puts our LTP and Climate Change Strategy targets at risk; and
4. THAT the EER committee **note** that staff will aim to prioritise the actions outlined in Table 1 of this report across council functions, subject to budget allocation.

3. Background - *He tirohanga whakamuri*

Responding to climate change is a strategic priority for the Council. In 2017, the Council signed the New Zealand Local Government Leaders Climate Change Declaration, alongside 70 other councils. The Declaration sets out seven principles to guide future decisions. The first principle is to "acknowledge the importance and urgent need to address climate change for the benefit of current and future generation". This requires councils to both adapt to the effects of climate change and, importantly, take action to mitigate the factors contributing to climate change. By signing the declaration, WDC has committed to: "Develop and implement ambitious action plans that reduce greenhouse gas emissions and support resilience within our own councils and for our local communities".

4. Issue/subject - *Kaupapa*

This report covers Council's Greenhouse Gas emissions (Section 4.1) and provides an outline of actions required to decrease Council's key emission sources.

It also covers Council's six-monthly reporting against the targets and actions outlined in Council's Climate Change Strategy and Action Plans for January to June 2024. Since adoption in 2020, WDC has been implementing the Council's Climate Change Strategy (2020-23) and Action Plans, which were ambitious in their targets. As we progressed the work, it was acknowledged that the Action Plans did not align with resourcing available.

The organisation has faced financial and resourcing constraints preventing it from reaching the longer-term actions which make the biggest impact. As a result, many teams have only been able to progress business as usual or ongoing actions. The results included in this report suggest Council should more actively prioritise and embed climate change considerations throughout its activities if meaningful progress is to be made. This may require review and realignment of functional budgets to enable allocation of the required resourcing.

These six-monthly reports will evolve to reflect the new Climate Change Strategy 2024-27 adopted by Council in June 2024. The first report on the new strategy is anticipated early in 2025.

4.1. Toitu Carbon Report 2023-24 - Greenhouse gas emissions

Whakatāne District Council has been part of the Toitū carbon reduce programme since the 2017-18 financial year. Participating in this program allows Council to estimate greenhouse gas emissions from activities where Council has full authority over operational policies and procedures. Participating in the carbonreduce programme allows Council to monitor and understand its emissions risk and the impact of various Council activities on climate change.

The Toitū Greenhouse Gas Emissions Inventory and Management Report 2023-24 is attached as appendix 1.

Greenhouse gas emissions data from the last seven years of reporting shows that no material reductions have been made. A new baseline was set and approved recently for the future reporting periods as well as new reduction targets as part of the Long-Term Plan 24/34. Without the necessary investments and commitments across the organisation, more increases are likely to be seen, and Council is at risk of failing its targets.

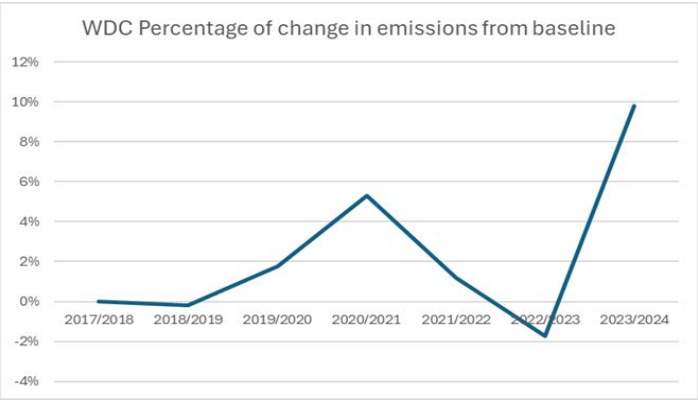

Figure 1. Whakatane District Council percentage change in emissions from the baseline.

7.3 Updated EER Final Six Monthly Climate change report Jan-June 2024(Cont.)

The 2023/24 financial year saw the Council record a significant increase in carbon emissions since the baseline year of 2017/18. Graphs of the emission increase are included in Appendix 2. The main drivers for this significant increase are the refrigerant and natural gas increases which are further detailed below.

The largest sources of Greenhouse gas emissions are:

- Waste Water Treatment Plants

  The Wastewater Treatment Plants make up our largest source of over 57% of total emissions. This had a two percent reduction in emissions from 2022/23 but from the base year has risen by 17%. WWTP will always be the largest and trickiest emission source to tackle as the required investment to make a significant step-change are beyond current financial capacity. Upcoming consents renewals in 2026 gives the Council a chance to really look at how wastewater is treated in our district.

- Electricity

  This is a good news story, and many positive learnings can be taken from here. It is an obvious example of what can be achieved when we put in the resources and effort. Electricity usage has nearly halved thanks to the monitoring with EMSOL and the ongoing actions of the Three Waters Team and the Property and Facilities team optimising operational demand and ensuring energy efficient solutions are considered in every upgrade or renewal of capital assets. It also shows that climate solutions can mean cost savings. The electricity related emissions did increase minimally from the previous year (3%) but a significant decrease of 40% has been recorded since the 2017/18 base year.

- Natural Gas

  Natural gas had been tracking well, due to the efforts of the Property and Facilities team with significant decreases from the base year. However, in 2023/24 a significant increase was recorded of 93%. This was due to several mechanical failures with the Aquatic Centre heat pump systems necessitating the use of the backup gas boilers to heat the pool water. Upgrades to the plant are in progress and these issues should be resolved placing us back on track.

- Diesel

  Diesel saw a significant increase of 19% from the baseline (2017) but a decrease from the previous year. Some form of Diesel will be needed until viable alternatives become affordable and available. The Council has had an increase in Diesel vehicles and an increase in usage. An upcoming fleet audit will ensure these will be looked at more closely.

- Waste

  Waste data was more accurately collected in 2023-24, therefore, it cannot be compared to previous years. Accurate recording is a key part of emissions reduction as it allows organisations to understand where they are at.

- Refrigerant (HVAC) Gas Loss

  Refrigerant gas loss has seen the biggest change with a 336% increase in 2023/24 compared to 2022/23. Older refrigerants have a higher greenhouse gas warming potential (GWP), therefore ensuring leakages do not occur is critical and while precautions are taken, they can be difficult to predict. Wherever possible refurbishment of Chiller Plant and Heat Pumps includes evaluating the lower GWP alternative refrigerants which are constantly under development.

The Property and Facilities team are looking closely at this emission source. Work will continue in this space, particularly as we move away from natural gas or boilers where practical and into the application of more heat pump technology.

4.2. Actions that would significantly impact and decrease our top emission sources

The actions are described in the table below.

Table 1. Actions to Reduce Emissions

Emission Source	Reduction Mechanism	Action Plan Number (Climate Strategy 24-27)	Budget Implication
Waste Water Treatment Plants	Step change reductions as consenting, and upgrades become available. Adopt and use new and novel technologies.	206, 208	High
Electricity	Solar on key buildings. Embed Energy KPIs for facilities.	66 44	High- depends on funding source
Natural Gas	The items below shall be included in the Emission reduction plan: Replace gas boiler at Whakatane War memorial hall. Replace gas boilers at Aquatic centre. Whakatane Holiday Park energy efficiency and upgrades. Te Koputu upgrades	50	High
Fuels and transport	EV first Fleet audit Consider ways to reduce Air Travel Consider how to reduce Petrol (Selective mowing)	140 141 116 182	Low

Waste	1. Waste audit of Civic Centre. 2. Target the waste streams that could have been prevented. (food packaging, coffee cups, unnecessary paper/printing) 3. Minimal waste usage in Council facilities embedded in internal policies.	105 86	Low
Refrigerants	When replacing gas boilers- consider the life of the new HVAC and install ones with lower GWP and better anti-leaking mechanisms.	50	High

4.3. Long-Term Plan Targets

Within the 2024/34 LTP the Council set new targets and a baseline for carbon emissions. The baseline is the 2022-23 period. The targets separate the wastewater treatment plant emissions from the rest of the Council.

The 2023/24 emissions relate to LTP 21/31 which did not have a climate change target. The whole of Council emissions LTP 24/34 target is now at risk for the year 2025.

Table 2. The 2023 baseline and 2024 actuals compared to the 2025 targets.

Waste Water Treatment Plant			
Year	2023 Baseline Actuals	2024 Actuals	2025 LTP Target
Total tCO2e	2219	2,173.00	2,174.62
Percentage change from baseline		-2.1%	-2%
tCO2e change from baseline		-46	-44
Total Council Emissions (excl WWTP)			
Year	2023 Baseline Actuals	2024 Actuals	2025 LTP Target
Total tCO2e	1183	1628	1088.36
Percentage change from baseline		38%	-8%
tCO2e change from baseline		445	-95

7.3 Updated EER Final Six Monthly Climate change report Jan-June 2024(Cont.)

The below graphs are a visual representation of this LTP 2022-23 baseline, the 2023-24 actuals and the LTP targets.

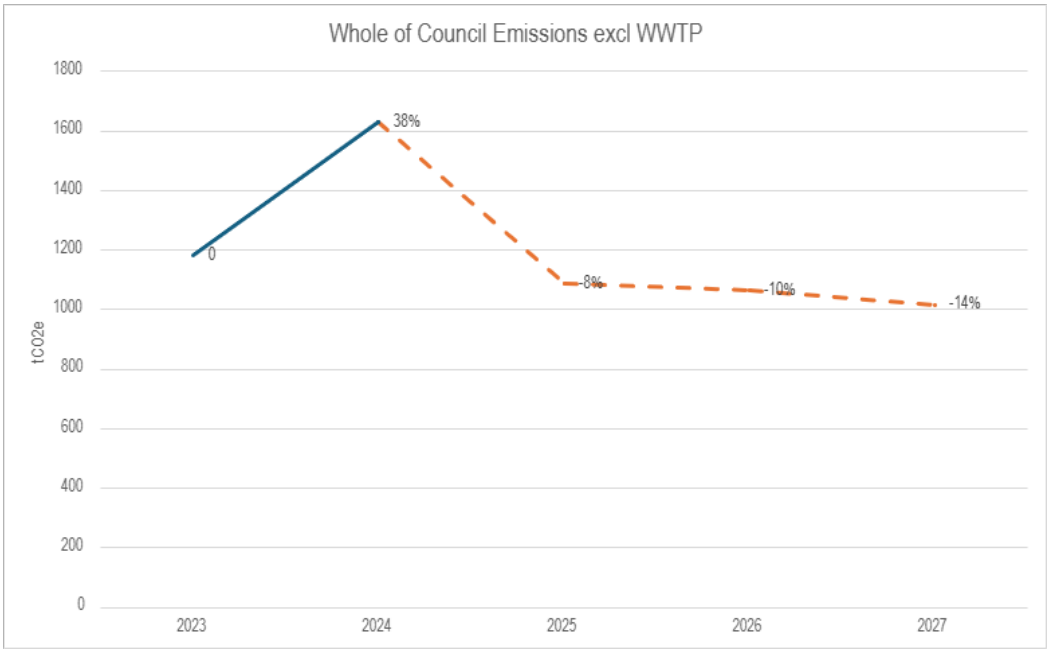

Figure 2. The Whole of Council emissions excluding the WWTP, 2022-23 new baseline and the 2023-24 actual emissions compared to the LTP targets for 2024-2027 (Orange dotted line).

To meet the 2025 target, the whole of Council emissions will need to decrease by 540tCO2e or by 46% from the 2023-24 reporting period.

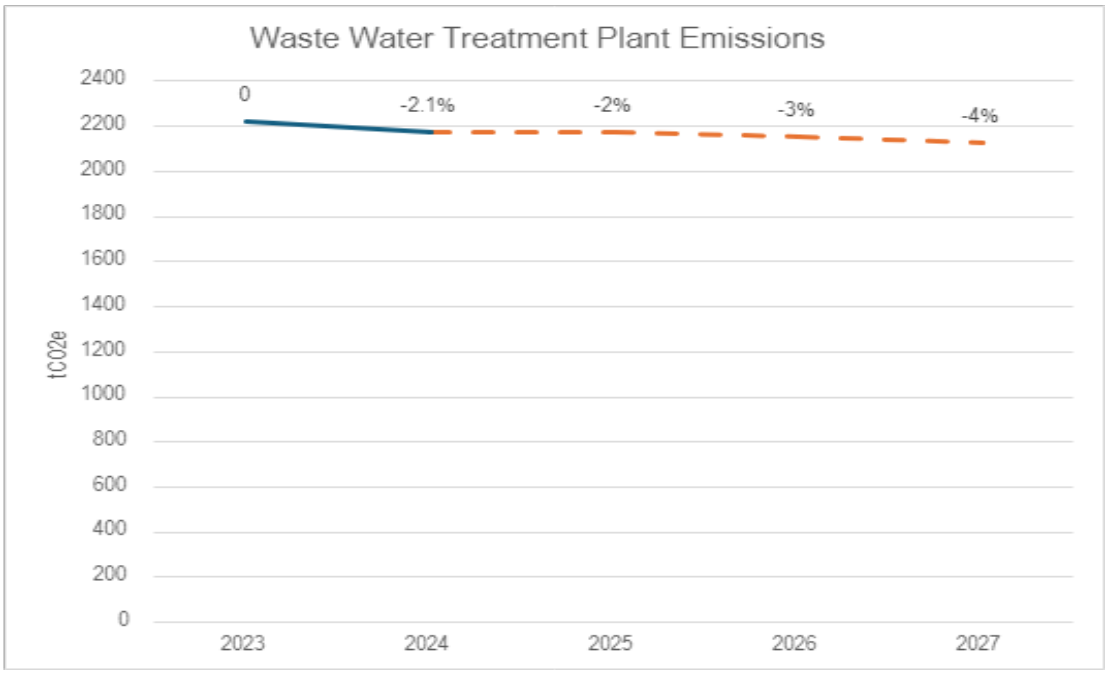

Figure 3. The WWTP emissions 2022-23 new baseline and the 2023-24 actual emissions compared to the LTP targets for 2024-2027 (Orange dotted line).

It must be noted that while this reduction has occurred, ongoing deliberate actions will need to occur to retain this reduction and meet the next LTP targets.

4.4. Carbon Emission auditing

Following questioning from elected members during LTP development, an analysis is underway to ascertain whether Toitū remains the best audit programme for Whakatāne District Council, taking into consideration a cost-benefit approach. Emissions data must be third party verified to ensure accuracy and prevent greenwashing. Due to the Councils various commitments, they must continue reporting on and third-party verifying their emission activities.

Staff will explore other auditor options over the coming months. A recommendation will be brought forward in 2025.

4.5. Leadership and Collaboration Action Plan

The new Climate Change Strategy (Whakatāne Climate Pathway) was adopted in June 2024. This document forms the Strategy for the next three years. This Strategy went out for public consultation alongside the Long-term Plan (LTP) in April 2024. Feedback was received from the public consultation process running in parallel with the LTP 2024-34. The feedback was incorporated into the Strategy and subsequent Action Plan.

The Strategy involved assessment of the role of Council's Climate Change Project Group, as well as considered various tools that aim to achieve priority actions. Tools for consideration include an operational Climate Change Policy, Climate Impact Statements and embedding environmental considerations within procurement processes. The implementation of this new Strategy began after June; therefore, it is out of scope of this report. Staff have periodic meetings with other Councils in the Bay of Plenty to learn from each other and pool together resources. Across the previous six months, an opportunity had arisen to participate in a software tool pilot that can help record, understand, and model district-wide emissions. Whakatāne District Council is participating in this pilot.

4.6. Transport Action Plan

The Government Policy Statement for Transport has directed funding away from active transport projects and maintenance resulting in minimal external funding being available for the delivery of walking and cycling improvements in the current LTP period. Staff are currently working with councillors to identify the full implications on the delivery programme but few, if any, active transport improvements are likely to be delivered in this period.

The Edgecumbe to Thornton Trail, funded through the previous government, is progressing well and sections 1 and 4 are expected to be complete ahead of the summer season. These are the first small steps towards creating a district-wide trail network for commuter and recreational cyclists, runners and walkers.

The reduction of corporate emissions for transport is an ongoing project. Air travel continues to be an issue while elected members and staff are required to attend events in person around the motu and overseas. The use of carpooling vehicles which includes the option of EVs has been highly successful.

4.7. Energy Action Plan

The Energy Management Programme supported by Energy Management Solutions (EMSOL) continues to deliver carbon and cost savings through energy reduction. An Energy Action Group (EAG) are consistently looking for ways to improve energy efficiency at our sites while Energy conservation and consideration of climate change implications area at the forefront of decision making around capital projects.

The Property and Facilities Team have taken action to reduce unnecessary energy use at Council facilities. These include the increasing use of sensor lights, swapping out fluorescent lights with LED alternatives, the implementation of Heat pump water heating, the purchase of low GWP Heat pump alternatives, or using low GWP drop in refrigerants in existing units while reducing gas boiler use are ongoing projects in all Facilities.

HVAC System design solutions at the Civic Centre are being investigated currently. Upon investigation of poor system performance over the winter months, it was discovered some control systems were not installed as per the original project specification resulting in increased power consumption coupled with poor temperature control. We are planning the necessary upgrades currently at no cost to Council. Upgrades will have a positive impact on power usage at the Civic facility.

4.8. Water Services Action Plan

The Three Waters team have been trailing smart meters (automatic water meter reading software) within the district for both volumetric and demand management purposes. Prior to smart metering, three waters staff were required to visit and enter every metered property and manually read water meters to see a household's usage; smart meters allow staff to check information by driving past the property, without going onto the property which can be undertaken in relative short period of time. Smart meters can also be interrogated to assess water consumption patterns and are the best tool for identifying properties with internal water leaks. Council is always reviewing new technology within this smart meter space and is looking at how homeowners could readily access their water meter consumption information, to increase awareness of water usage, to educate and encourage behaviour changes that uses water wisely.

As part of LTP consultation, members from the three waters team attended events throughout the district to discuss draft LTP proposals. Water user charges was a common topic of discussion that resulted in increasing awareness of the resources required to provide drinking water and treat grey water and acknowledgement of the associated environmental impact these essential services require.

The aerator run time within the Ōhope wastewater pond is an ongoing project that will potentially reduce associated energy consumption. It was recommended following an Energy Audit.

4.9. Waste and circular economies Action Plan

The waste team have been working on different initiatives.

- The Solid Waste and Comms teams used Council's Facebook page to help promote "Leftover Legends" run by Love Food Hate Waste to encourage people to reuse leftovers instead of throwing them straight in the bin. As a nation, we waste more than 12,901 tonnes of leftovers every year. That's a hard hit in the pocket, and it also means a lot of unnecessary food waste going to landfills.
- The Tyrewise Product Stewardship Scheme started on 1 March 2024. Anyone paying for new tyres since that date will have noticed an increase in price as the collection and recycling and

reprocessing of the tyre at end-of-life is included as a levy in the purchase price. From 1 September 2024 the tyres will be able to be dropped off at both of our Resource Recovery Centres free of charge, as the transport and processing costs will be covered by the scheme. Most tyre retailers in the district are also registered collection points, so customers can leave their old tyres with the supplier when they buy new ones. There are some limitations on what Council will accept, these are:

i. No more than 5 tyres per customer drop-off;
ii. No commercial loads;
iii. No tyres on rims – customers will need to take these to a tyre retailer; and
iv. No tyres full of soil.

- Council supports the "Paper for Trees" programme whereby schools collect paper for recycling and are rewarded with native plants for planting. Council also provides free recycling collections to the schools taking part. This has seen 142 tonnes of paper and cardboard recycled and 524 trees planted.

4.10. Land use and built environment

Most of the actions within the land-use and built environment action plan are on-going planning activities.

Most of the actions within the land-use and built environment action plan are on-going planning activities. The Development and Environment Services teams are working to promote a built environment which is resilient to climate change impacts. Work is well underway on a District Climate Change Risk Assessment which is Stage 1 of a 5-stage District Climate Adaptation Programme.

The District Plan requires new builds in flood prone areas to exceed requirements of the building code for floor level height, which helps reduce flood risk, and this is being further refined through the forthcoming Proposed Plan Change 4.

The Tree Strategy was adopted by the Living Together Committee and will be integral to our urban and built environments and will provide a framework to manage Council's amenity tree population.

Discussions have been occurring with local charities and community groups after the harvest of the Eagle hill pine block and subsequent decision for it to be replanted in natives.

A forestry block action plan is being developed to ensure there is a plan for every forestry block owned by the council. This is an exciting project that will continue over the next year.

5. Options analysis - *Ngā Kōwhiringa*

5.1. Option 1: Receive and note the recommendations (preferred).

5.1.1. Advantages

- Providing clear guidance and facilitating decarbonisation action across Council activities will help to mitigate the worst effects of climate change and help Council deliver on its 2017 decarbonisation commitments and LTP targets.
- Ensuring the Council takes responsibility for the increase in emissions and implements solutions to reduce them, therefore meeting targets or genuinely attempting to meet targets, helps Council maintain its reputation as a leader in the climate change mitigation space.

5.1.2. Disadvantages

- There are no disadvantages associated with this option.

5.2. Option 2: Do not receive and note the recommendations.

5.2.1. Advantages

- No advantage.

5.2.2. Disadvantages

- No guidance provided may further hinder action and lead to worse results in future audits and reporting.
- If actions are not prioritised and no change to resourcing is made, Council is at risk of reneging on its commitments to decarbonise, noted in the 2017 declaration and its LTP targets. This will ultimately lead to more severe climate consequences for communities in the future.

6. Significance and Engagement Assessment - *Aromatawai Pāhekoheko*

6.1. Assessment of Significance

While the Council's overall climate change work programme is of high significance, the recommendation of this report (to receive the End of Year Climate Change Report) is assessed to be of low significance in accordance with Council's Significance and Engagement Policy.

6.2. Engagement and community views

The results for progress on Council's Climate Change work programme (as attached to this Report) are publicly available through this agenda and will be made available under the climate change reporting section of Council's public website after this Committee meeting.

7. Considerations - *Whai Whakaaro*

7.1. Financial/budget considerations

There is no budget considerations associated with the recommendations of this report.

7.2. Strategic alignment

No inconsistencies with any of the Council's policies or plans have been identified in relation to this report.

7.3. Climate change assessment

Based on this climate change assessment, the decisions and matters of this report are assessed to have high climate change implications and considerations, in accordance with the Council's Climate Change Principles.

7.4. Risks

Lack of climate action poses a significant risk to everything, particularly:

- Adverse effect on the community (economic, social, environmental, and cultural)
- Publicity/public perception
- Health and safety
- Financial impact/security of funding
- Political

Attached to this report:

- Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report
- Appendix 2 - Six Monthly Climate Change Reporting - PowerPoint

7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report

TOITŪ CARBON MARKS

GREENHOUSE GAS EMISSIONS INVENTORY AND MANAGEMENT REPORT

Toitū carbonreduce programme

Prepared in accordance with ISO 14064-1:2018 and the Technical Requirements of the Programme

WHAKATĀNE District Council
Kia Whakatāne au i ahau

Whakatāne District Council

Prepared by (lead author): Georgia Mischefski-Gray - Strategic Policy Analyst

Dated: 10 October 2024

Verification status: Reasonable for all mandatory emissions of the programme except wastewater treatment. Limited for wastewater treatment and all non-mandatory emissions.

Measurement period: 01 July 2023 to 30 June 2024

Base year period: 01 July 2017 to 30 June 2018

Approved for release by:

Steven Perdia - General Manager Strategy & Transformation

TOITŪ ENVIROCARE

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DISCLAIMER

AVAILABILITY

This report will be made publicly available on the Council's website following the November Environment, Energy and Resilience Committee.

REPORT STRUCTURE

The Inventory Summary contains a high-level summary of this year's results and from year 2 onwards a brief comparison to historical inventories.

Chapter 1, the Emissions Inventory Report, includes the inventory details and forms the measure step of the organisation's application for Programme certification. The inventory is a complete and accurate quantification of the amount of GHG emissions and removals that can be directly attributed to the organisation's operations within the declared boundary and scope for the specified reporting period. The inventory has been prepared in accordance with the requirements of the Programme[1], which is based on the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) and ISO 14064-1:2018 Specification with Guidance at the Organization Level for

[1] Programme refers to the Toitū carbonreduce, Toitū net carbonzero and the Toitū climate positive programmes.

Quantification and Reporting of Greenhouse Gas Emissions and Removals[2]. Where relevant, the inventory is aligned with industry or sector best practice for emissions measurement and reporting.

Chapter 2, the reduction plan and progress report, forms the manage step part of the organisation's application for Programme certification.

See Appendix 1 and the related Spreadsheet for detailed emissions inventory results, including a breakdown of emissions by source and sink, emissions by greenhouse gas type, and non-biogenic and bio-genic emissions. Appendix 1 also contains detailed context on the inventory boundaries, inclusions and exclusions, calculation methodology, liabilities, and supplementary results.

This overall report provides emissions information that is of interest to most users but must be read in conjunction with the inventory workbook for covering all of the requirements of ISO 14064-1:2018.

[2] Throughout this document 'GHG Protocol' means the *GHG Protocol Corporate Accounting and Reporting Standard* and 'ISO 14064-1:2018' means the international standard *Specification with Guidance at the Organizational Level for Quantification and Reporting of Greenhouse Gas Emissions and Removals*.

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TABLES

FIGURES

EXECUTIVE SUMMARY

This is the annual greenhouse gas (GHG) emissions inventory and management report for Whakatāne District Council covering the measurement period 01 July 2023 to 30 June 2024.[3]

Table 1: Inventory summary

Category (ISO 14064-1:2018)	**Scopes (ISO 14064-1:2006)**	**2018**	**2023**	**2024**
Category 1: Direct emissions (tCO_2e)	Scope 1	2,513.42	2,864.88	3,072.55
Category 2: Indirect emissions from imported energy (location-based method*) (tCO_2e)	Scope 2	754.52	420.94	463.07
Category 3: Indirect emissions from transportation (tCO_2e)	Scope 3	57.26	39.64	24.94
Category 4: Indirect emissions from products used by organisation (tCO_2e)		136.31	76.70	240.29
Category 5: Indirect emissions associated with the use of products from the organisation (tCO_2e)		0.00	0.00	0.00
Category 6: Indirect emissions from other sources (tCO_2e)		0.00	0.00	0.00
Total direct emissions (tCO_2e)		**2,513.42**	**2,864.88**	**3,072.55**
Total indirect emissions* (tCO_2e)		**948.08**	**537.28**	**728.30**
Total gross emissions* (tCO_2e)		**3,461.50**	**3,402.16**	**3,800.86**
Category 1 direct removals (tCO_2e)		0.00	0.00	0.00
Purchased emission reductions (tCO_2e)		0.00	0.00	0.00
Total net emissions (tCO_2e)		**3,461.50**	**3,402.16**	**3,800.86**

*Emissions are reported using a location-based methodology. See section 1.2.1 for details.1.2.1

[3] Throughout this document "emissions" means "GHG emissions". Unless otherwise stated, emissions are reported as tonnes of carbon dioxide equivalent (tCO_2e).

7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report(Cont.)

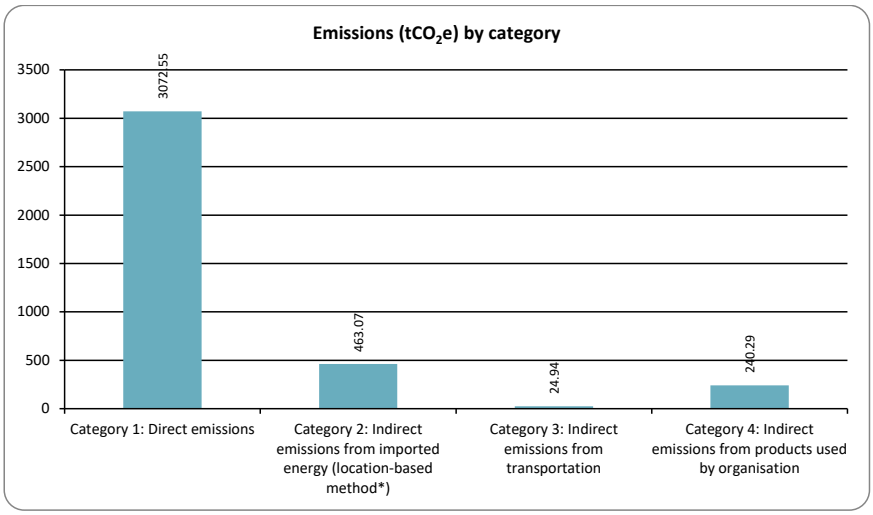


Figure 1: Emissions (tCO_2e) by Category for this measurement period

CHAPTER 1: EMISSIONS INVENTORY REPORT

1.1. INTRODUCTION

This report is the annual greenhouse gas (GHG) emissions inventory and management report for Whakatāne District Council.

The inventory provides a quantification of the amount of GHG emissions that can be directly attributed to the organisation's operations within the declared boundary and scope for the specified reporting period. The inventory has been prepared in accordance with the requirements of the measure-step of the Programme, which is based on the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) and ISO 14064-1:2006 Specification with Guidance at the Organization Level for Quantification and Reporting of Greenhouse Gas Emissions and Removals. Where relevant, the inventory is aligned with industry or sector best practice for emissions measurement and reporting.

Although this data may have some limitations, the measures in this report have been audited and completed against an international standard. Whakatāne District Council is continuously working to improve their reporting practices to ensure that emissions are measured to a high standard.

The GHG inventory aligns with the objectives of our Climate Change Strategy 2020-23.

The inventory report and any GHG assertions are expected to be verified by a Programme-approved, third-party verifier. The level of assurance is reported in a separate Assurance Statement provided to the directors of the certification entity.

1.2. EMISSIONS INVENTORY RESULTS

Table 2: Emissions inventory summary for this measurement period

Measurement period: 01 July 2023 to 30 June 2024.

Category	Toitū carbon mandatory boundary (tCO_2e)	Additional emissions (tCO_2e)	Total emissions (tCO_2e)
Category 1: Direct emissions	3,072.55 Diesel, Fertiliser use Dolomite, Fertiliser use Lime, Fertiliser use Nitrogen, HFC-134a, LPG stationary commercial, Natural Gas distributed commercial, Petrol premium, Petrol regular, R-407C, R-410A, WWTP sewage (tCO_2e)	0.00	3,072.55
Category 2: Indirect emissions from imported energy (location-based method*)	463.07 Electricity - Annual factor	0.00	463.07
Category 3: Indirect emissions from transportation	21.51 Air travel domestic (average), Rental Car average (fuel type unknown), Taxi (regular)	3.43 Accommodation - New Zealand	24.94
Category 4: Indirect emissions from products used by organisation	237.60 Electricity distributed T&D losses, Natural Gas distributed T&D losses, Waste landfilled LFGR Mixed waste	2.68 Paper (envelopes - white), Paper use - default	240.29

7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report(Cont.)

Category	Toitū carbon mandatory boundary (tCO_2e)	Additional emissions (tCO_2e)	Total emissions (tCO_2e)
Category 5: Indirect emissions associated with the use of products from the organisation	0.00	0.00	0.00
Category 6: Indirect emissions from other sources	0.00	0.00	0.00
Total direct emissions	**3,072.55**	**0.00**	**3,072.55**
Total indirect emissions*	**722.19**	**6.12**	**728.30**
Total gross emissions*	**3,794.74**	**6.12**	**3,800.86**
Category 1 direct removals	0.00	0.00	0.00
Purchased emission reductions	0.00	0.00	0.00
Total net emissions	**3,794.74**	**6.12**	**3,800.86**
Emissions intensity		**Mandatory emissions**	**Total emissions**
Rating Units - Number of rating units in the District (gross tCO_2e / unit)		0.22	0.22
Operating revenue (gross tCO_2e / $Millions)		34.81	34.87

*Emissions are reported using a location-based methodology. See section 1.2.1 for details.1.2.1

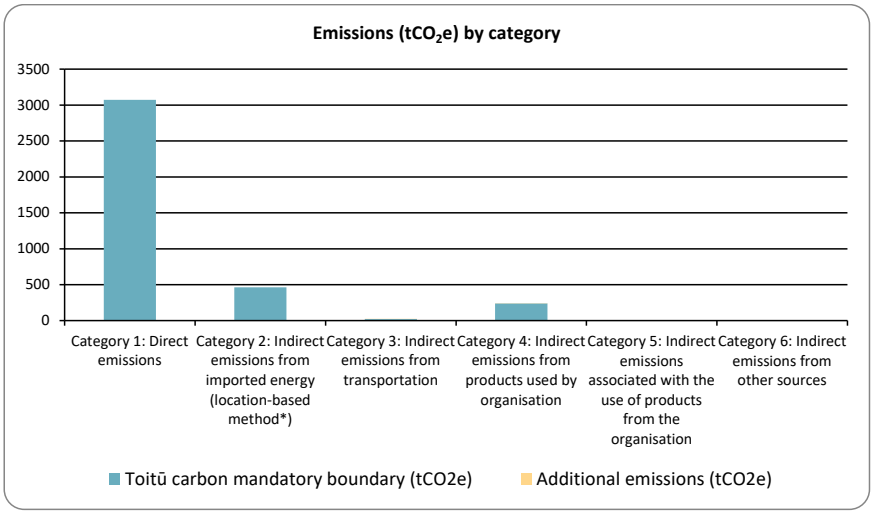


Figure 2: Emissions (tCO_2e) by category

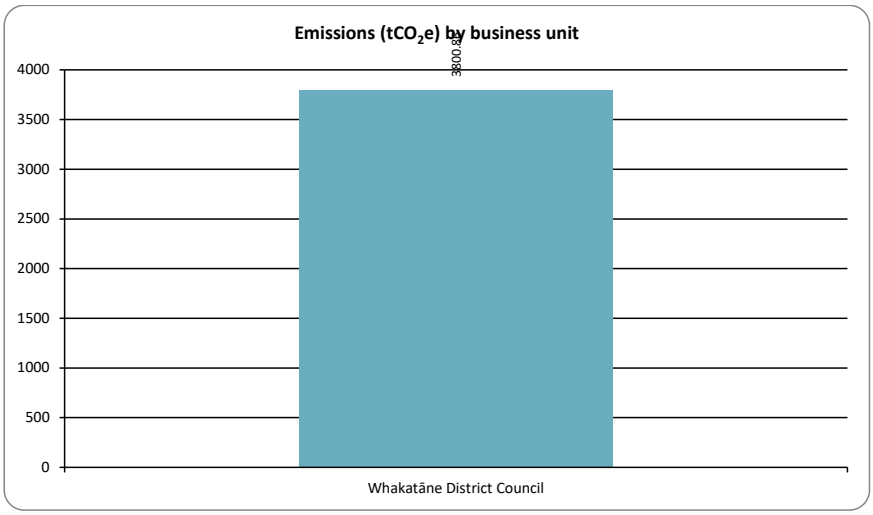


Figure 3: Emissions (tCO_2e) by business unit

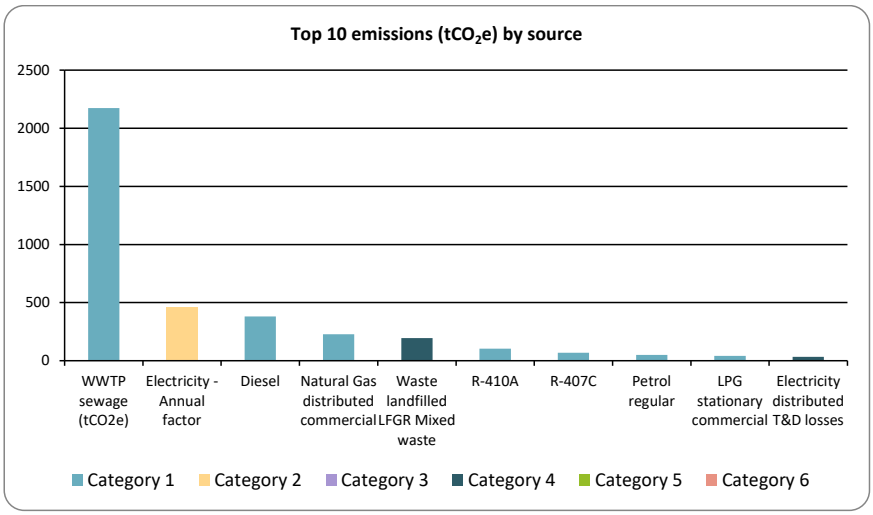


Figure 4: Top 10 emissions (tCO_2e) by source

1.2.1. Dual reporting of indirect emissions from purchased and generated energy

All purchased and generated energy emissions are dual reported using both the location-based method and market-based method. Dual reporting illustrates the role of supplier choice, onsite renewable energy generation and contractual instruments in managing indirect emissions from energy alongside any ongoing energy efficiency and reduction efforts.

Whakatāne District Council aligns to location-based reporting for tracking energy related emissions and reductions over time.

Whakatāne District Council has been undertaking an Energy Management Programme since 2018. EECA funding was secured and used to fund an initial energy audit. Energy Management Solutions (EMSOL) have since undertaken another audit and provided energy reduction actions. They continually support us to complete these actions which includes helping in purchasing decisions and continual monitoring. This work allows the Council to identify, implement and monitor opportunities for energy savings and emission reductions.

A feasibility study was completed in 2022-23 which explored the possibility of solar implementation. Continual solar exploration and potential implementation is a key action within the new Climate Change Strategy (2024-27). These projects aim to reduce the Council's emissions from purchased and generated energy.

Table 3. Dual reporting of indirect emissions from imported energy

Category	Location-based methodology (tCO_2e)	Market-based methodology (tCO_2e)
Category 1: Direct emissions	3,072.55	3,072.55
Category 2: Indirect emissions from imported energy	463.07	439.73
Category 3: Indirect emissions from transportation	24.94	24.94
Category 4: Indirect emissions from products used by organisation	240.29	240.29
Category 5: Indirect emissions associated with the use of products from the organisation	0.00	0.00
Category 6: Indirect emissions from other sources	0.00	0.00
Total direct emissions	**3,072.55**	**3,072.55**
Total indirect emissions	**728.30**	**704.96**
Total gross emissions	**3,800.86**	**3,777.51**
Category 1 direct removals	0.00	0.00
Total net emissions	**3,800.86**	**3,777.51**

1.3. ORGANISATIONAL CONTEXT

1.3.1. Organisation description

The Whakatāne District Council's (the Council) activities make an important contribution to the community, providing essential services and recreational opportunities that are used every day. Many Council functions are guided by legislation, including the Local Government Act 2002, the Resource Management Act 1991 and the Local Government (Rating) Act 2002. Within this framework, there is a considerable degree of flexibility in deciding what activities are undertaken and how they are carried out.

The elected Council representatives (Councillors) are responsible for making key policy decisions that guide activities and provide direction for the district's future.

The Council carries out several functions, responsibilities and activities which include:

- Constructing, managing and maintaining local infrastructure on behalf of the community. This infrastructure includes roads, water supply, sewage disposal, refuse collection and disposal, and storm water drainage.
- Providing and maintaining recreational facilities and community amenities which include parks, gardens, reserves, libraries, community halls, museum, cemeteries, crematorium, swimming pools, public conveniences, airport and harbours.
- Planning for the future needs of the district.
- Managing the environment for present and future residents.
- Undertaking a regulatory role to ensure that residents have a safe, desirable and healthy environment in which to live.
- Advocacy on behalf of the local community with central government, other local authorities and other agencies.
- Promoting and facilitating development of the district that will benefit residents and providing a comprehensive information service.

The Council recognises that their activities have a direct impact on the environment. The Council is working to understand this impact and take steps to reduce it, particularly in the context of climate change. The Council aspires to show leadership by actively considering climate change in all decisions and working to mitigate and adapt to climate change throughout their activities across the district. This includes creating policies, monitoring energy usage, improving procurement and completing risk assessments. The Council aspires to support their communities by ensuring that the infrastructure and services provided promote resilience.

The Mayor signed the Local Government Leader's Climate Change Declaration in 2017. Since then, the Council has embarked on a journey of climate action. The Council adopted a Climate Change Strategy and six action plans for the 2020 to the 2023-24 reporting periods. Over the past year, the Council has developed the next strategy for the reporting periods of 2024-25 until 2027-28. This involved the community, staff, Councillors and climate experts. This new strategy builds on the strengths and weaknesses of the previous strategy and sets achievable yet ambitious targets. These include creating internal climate policy, updating the current procurement policy, creating staff learning modules and making environmentally friendly asset upgrade decisions. This 2024-27 strategy is now adopted after significant and vigorous work. The emission reduction targets included within it will be first reported on in the 2024/25 reporting period. This current report is still using the 2020-23 reporting targets.

Commitment to certification

The Council aspires to show leadership by actively considering climate change in all their decisions and working to mitigate and adapt to climate change throughout all their activities across the district.

Through signing the 2017 New Zealand Local Government Leaders' Climate Change Declaration, they showed a commitment to taking ambitious climate action to reduce greenhouse gas emissions and support the resilience of Council and local communities. The development and implementation of the first Climate Change Strategy and six action plans saw many new actions working towards reaching the climate change targets. At the conclusion of the first three years of this strategy, a new plan has been developed which includes periodical targets which incrementally lower emissions. Having good data collection and reporting of Council emissions helps to make decisions and track progress against these targets.

The Council is committed to working with communities to understand, prepare for and respond to the physical impacts of climate change. This also involves working with central government to deliver on national emission reduction targets.

The Council acknowledges that the future is uncertain. However, as we learn more about climate change and how it will impact us as an organisation and a community, we will continue to take steps to ensure that the Whakatāne District remains the place of choice to live, work, and play for generations to come.

GHG Reporting

Our climate change vision is: Whakatāne District Council will actively lead and support Whakatāne District to mitigate and adapt to the effects of climate change to be great ancestors for future generations. This report will help the Council lead by example, as it demonstrates the commitment to recording and reducing emissions.

Participating in Toitū's Carbon Reduce programme aligns with several of the Councils climate change principles from its 2020-23 strategy, including:

1. We will act now - as this programme helps Council set targets to reduce our emissions and understand how to achieve them.

2. We will care for and protect the environment - reducing emissions is necessary to achieve this.

3. We will learn - as this report helps us understand the impacts of various Council activities.

4. We will be part of the solution as participation in this programme demonstrates our commitment towards climate change.

Climate Change Impacts

The Council is obligated to promote the environmental, social, cultural, economic wellbeing of communities in the Whakatāne district as set out in the Local Government Act 2002. Services that are affected by the impacts of climate change include three waters services, planning for housing and population growth, emergency management, infrastructure, roads and key Council buildings.

1.3.2. Statement of intent

This inventory forms part of the organisation's commitment to gain Toitū carbonreduce certification. The intended uses of this inventory are:

Intended use and users

The essential intended use of the inventory is to ensure compliance with the requirements of the ISO14064:2018 emissions reporting standard and to inform what Councils core emissions are.

The Council is committed to publicly reporting its GHG inventory following verification on the Whakatāne District Council website. This report is intended for all Whakatāne residents, Councillors, suppliers, staff, and other parties across Aotearoa New Zealand interested in the Council's GHG inventory and efforts to manage down emissions. This report is intended to support decision making of Councillors, Executive Leadership team and asset managers.

Other schemes and requirements

The Council does not plan to use this inventory to align or comply with a scheme. The inventory will be reported through six monthly climate change reporting and annual reporting.

1.3.3. Person responsible

Steven Perdia - General Manager Strategy & Transformation is responsible for overall emission inventory measurement and reduction performance, as well as reporting results to top management. Steven Perdia - General Manager Strategy & Transformation has the authority to represent top management and has financial authority to authorise budget for the Programme, including Management projects and any Mitigation objectives.

State any other people/entities involved

Georgia Mischefski-Gray - Strategy and Policy Analyst

Leny Woolsey - Manager Strategy and Performance

Top management commitment

The Mayor of Whakatāne District Council signed the 2017 New Zealand Local Government Leaders' Climate Change Declaration. The Council adopted the first Climate Change Strategy (2020-2023) in 2019 showing ambitious commitment to climate action. In 2024, the Council adopted a new Climate Change Strategy which will cover the reporting periods of 2024-25 until 2027-28.

The Environment, Energy and Resilience Committee continue to oversee the wider Climate Change Strategy and receive regular updates on progress. The Committee also monitors the progress towards the targets, goals and actions outlined in the Council's Climate Change Strategy and Action Plans. These reports are provided to the Committee six-monthly.

Management involvement

Overall, responsibility for the Climate Change Strategy sits with the Climate Change Project Lead, Steven Perdia and the Chief Executive.

*The people listed were in those roles during the measurement period.

1.3.4. Reporting period

Base year measurement period: 01 July 2017 to 30 June 2018

The Councils commitment to the New Zealand Local Government Leaders' Climate Change Declaration in 2017 committed them to put into place ambitious action plans to reduce GHG emissions, while building the ability of the organisation and the community to recover quickly from difficulties. Becoming a Toitū carbonreduce certified organisation is a key step to implement the climate change action plans; as such, the Council has been committed to the carbonreduce certification programme from the 2017-18 financial year onwards.

Whakatāne District Council expanded the scope of the emission sources included in the inventory for this reporting period, to include lime fertiliser, more accurate waste data and an additional refrigerant (HFC-134a).

Measurement period of this report: 01 July 2023 to 30 June 2024

This report is annual.

This report covers the most recent financial year period of 1 July 2023 to 30 June 2024. Local government tends to report according to the financial year. Having this report cover the financial year ensures there is alignment with other reports; some of which may use data from this report (i.e. the Annual Report)

1.3.5. Organisational boundary and consolidation approach

An operational control consolidation approach was used to account for emissions.[4]

Organisational boundaries were set with reference to the methodology described in the GHG Protocol and ISO 14064-1:2018 standards.

Justification of consolidation approach

The Council is involved in a broad range of products and services within the district. To facilitate best practice and efficiency, it is not always practical to have full authority over operational policies and procedures; rather it is best to have relevant industry experts to control these.

[4]control: the organisation accounts for all GHG emissions and/or removals from facilities over which it has financial or operational control. equity share: the organisation accounts for its portion of GHG emissions and/or removals from respective facilities.

In these circumstances, facilities may be provided while the services are contracted out to relevant experts. These experts are also best placed to reduce emissions themselves, as they have in-depth knowledge of their industry. As such, an operational control consolidation approach has been used to account for emissions.

Organisational structure

Figure 5 shows what has been included in the context of the overall structure.

The chart below provides an overview of business areas and locations of the Whakatāne District Council which have associated carbon emissions. The orange boxes indicate areas that have been excluded from the inventory.

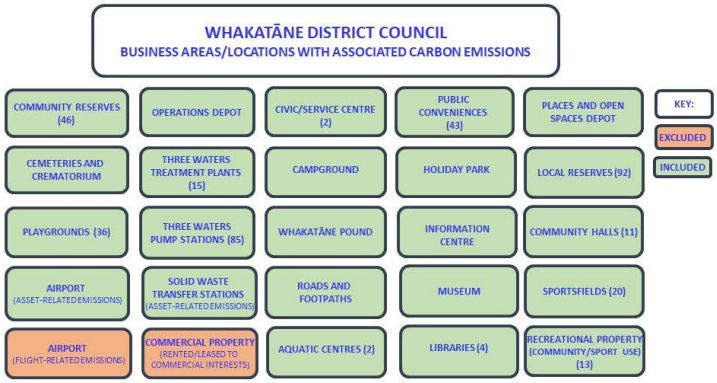


Figure 5: Organisational structure

Table 4. Brief description of business units, sites and locations included in this emissions inventory

Company/Business unit/Facility	Physical location	Description
Community reserves (46)	Multiple	The WDC is responsible for 46 reserves across the district.
Operations Depot	0 Tāneatua Road, Whakatāne	The operations depot is both a workspace and equipment storage.
Civic centre	14 Commerce Street, Whakatāne	The civic centre is the main office building.
Service centre	0 Main Road, Murupara	The service centre is a both a workspace and equipment storage.
Public conveniences (43)	Multiple	Public conveniences include public bathrooms.
Places and open spaces depot	60 Keepa Road, Whakatāne	The places and open spaces depot is a workspace and equipment storage.
Cemeteries and crematorium	Hillcrest Cemetery, Whakatāne	Crematorium and cemetery.

Company/Business unit/Facility	Physical location	Description
Three waters and treatment plants (15)	Multiple	Treatment of wastewater, storm water and drinking water. Whakatāne and Ōhope are the biggest.
Campground	State Highway 2, Pikowai	Pikowai campsite.
Holiday Park	1 McGarvey Road, Whakatāne	Whakatāne holiday park.
Local reserves (92)	Multiple	Community reserves.
Playgrounds (36)	Multiple	Includes 36 playgrounds across the district.
Three water pump stations (85)	Multiple	Storm water and wastewater pumping infrastructure.
Whakatāne Pound	51 Te Tahi Street, Whakatāne	Dog pound, for lost animals.
Information centre	1 Kakaharoa Whakatāne	The information centre provides information to tourists visiting the district.
Community halls (11)	Multiple	11 community halls across the region.
Airport (asset related emissions)	216 Aerodrome Road, Whakatāne	The airport site.
Solid waste transfer stations	44 Te Tahi Street, Whakatāne	The solid waste transfer station is a recycling centre.
Roads and footpaths	Multiple	District footpaths and roads (excl. state highways).
Museum	51 Boon Street, Whakatāne	The museum and research centre holds artifacts and acts as an office.
Sports fields (20)	Multiple	Multiple sports fields across the district.
Aquatic centres (2)	28 Short Street, Pine drive, Whakatāne	Two aquatic centres - Whakatāne and Murupara.
Libraries (4)	Multiple	Four libraries across the district in Ōhope, Whakatāne, Edgecumbe and Murupara.
Recreational property (communal/sport use) (13)	Multiple	Sports clubs and recreational buildings across the district.

1.3.6. Excluded business units

There are three business units that are excluded from the organisational boundary: flight-related emissions relating to the Whakatāne airport, solid waste services, and a range commercial properties that are located on Council-owned land.

The Airport:

The Whakatāne Airport is a Council-Controlled Organisation (CCO) under the Local Government Act 2002. It was formed as a CCO in 2006 and is a joint venture partnership between Council and the Ministry of Transport, with each party owning a 50 percent share. The Whakatāne Airport is classified as a 'lifeline utility', meaning that it provides essential infrastructure; in emergencies the airport may be used to provide essential facilities and services.

7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report(Cont.)

Whakatāne District Council provides facilities for flights, including maintenance of the runway and terminal building. Council also ensures that the airport is compliant with Civil Aviation Authority of New Zealand requirements. The scheduling of flights is determined solely by Air Chatham's and is not influenced by Council. As such, Council does not have operational control over the emissions created from airport-flight activities. Flight-related emissions from the Whakatāne Airport are therefore excluded from this report. Despite not having operational control over Air Chathams flights within the district, it does have influence over the airport as an asset – with the airport's other emission sources (electricity, petrol from mowing) captured in this report. The Whakatāne Airport does see opportunities to help the Council reduce emissions, and is working to achieve this in the future, in the coming year a deeper look into the Airport's emissions will be completed alongside the development of the Airport Masterplan.

Waste:

The waste management services are contracted to Waste Management - who collect waste and recycling material on behalf of Council for processing. Waste Management are experts, and they are also part of Toitū's Carbonreduce certification programme; as such, emissions from Waste Management's services in our district are not included by the Council. To avoid double-counting of emissions, we have excluded waste management services from this report. The Council does still include the waste created from their buildings and activities.

Leases:

Council currently owns several leasehold titles within the district. These titles are leased to various stakeholders, which are used for different purposes (commercial shops, farm/grazing land etc.). As such, Council does not have authority to control what tenants do with the land.

CHAPTER 2: EMISSIONS MANAGEMENT AND REDUCTION REPORT

2.1. EMISSIONS REDUCTION RESULTS

Whakatāne District Council has not reduced their emissions from the baseline of 2017/18. An increase of 10% total net emissions was recorded this reporting period. With the learnings from the previous years, new targets were set during 2023-24 for the future reporting periods.

Table 5: Comparison of historical GHG inventories

Category	2018	2019	2020	2021	2022	2023	2024
Category 1: Direct emissions (tCO_2e)	2,513.42	2,479.96	2,514.36	2,536.62	3,543.67	2,864.88	3,072.55
Category 2: Indirect emissions from imported energy (location-based method*) (tCO_2e)	754.52	788.04	850.83	977.59	626.74	420.94	463.07
Category 3: Indirect emissions from transportation (tCO_2e)	57.26	71.33	51.13	45.16	27.35	39.64	24.94
Category 4: Indirect emissions from products used by organisation (tCO_2e)	136.31	116.19	106.33	85.05	77.14	76.70	240.29
Category 5: Indirect emissions associated with the use of products from the organisation (tCO_2e)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Category 6: Indirect emissions from other sources (tCO_2e)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total direct emissions (tCO_2e)	**2,513.42**	**2,479.96**	**2,514.36**	**2,536.62**	**3,543.67**	**2,864.88**	**3,072.55**
Total indirect emissions* (tCO_2e)	**948.08**	**975.55**	**1,008.29**	**1,107.80**	**731.23**	**537.28**	**728.30**
Total gross emissions* (tCO_2e)	**3,461.50**	**3,455.51**	**3,522.65**	**3,644.43**	**4,274.90**	**3,402.16**	**3,800.86**
Category 1 direct removals (tCO_2e)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Purchased emission reductions (tCO_2e)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total net emissions (tCO_2e)	**3,461.50**	**3,455.51**	**3,522.65**	**3,644.43**	**4,274.90**	**3,402.16**	**3,800.86**
Emissions intensity							
Rating Units - Number of rating units in the District (gross tCO_2e / unit)	0.21	0.21	0.21	0.21	0.25	0.21	0.22
Rating Units - Number of rating units in the District (gross mandatory tCO_2e / unit)	0.21	0.21	0.21	0.21	0.25	0.21	0.22
Operating revenue (gross tCO_2e / $Millions)	45.91	46.51	44.45	38.09	48.98	35.44	34.87
Operating revenue (gross mandatory tCO_2e / $Millions)	45.79	46.42	44.37	38.02	48.94	35.39	34.81

*Emissions are reported using a location-based methodology. See section 1.2.1 for details.1.2.1

7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report(Cont.)

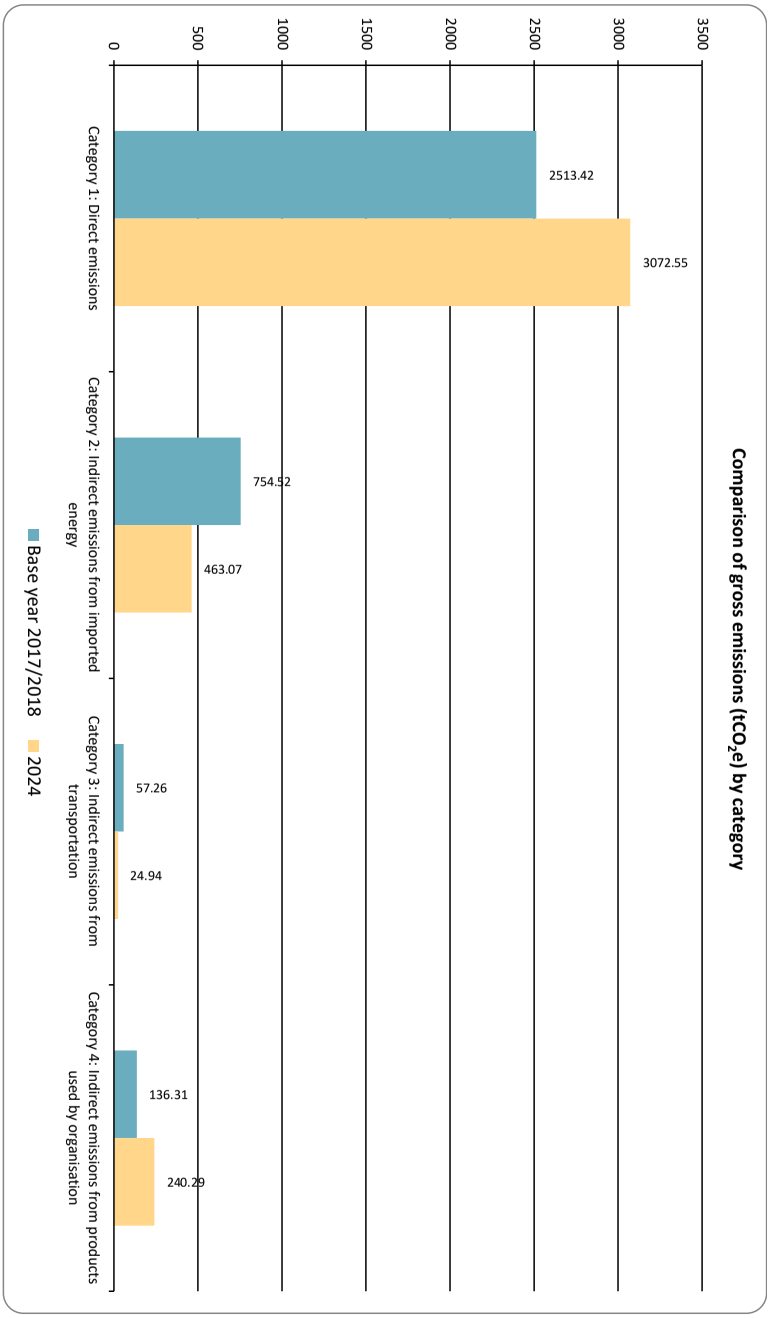


Figure 6: Comparison of gross emissions (tCO_2e) by category between the reporting periods

7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report(Cont.)

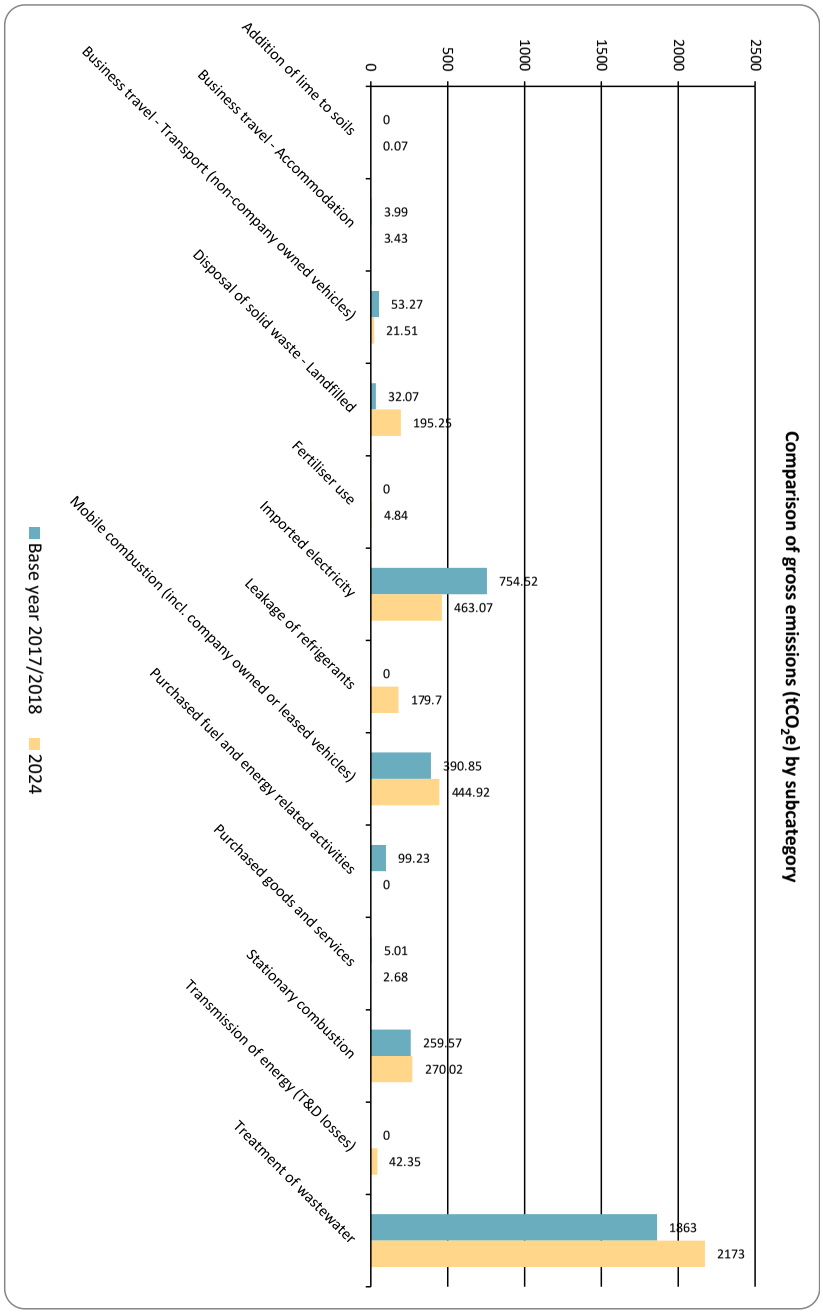


Figure 7: Comparison of gross emissions (tCO_2e) by subcategory between the reporting periods

7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report(Cont.)

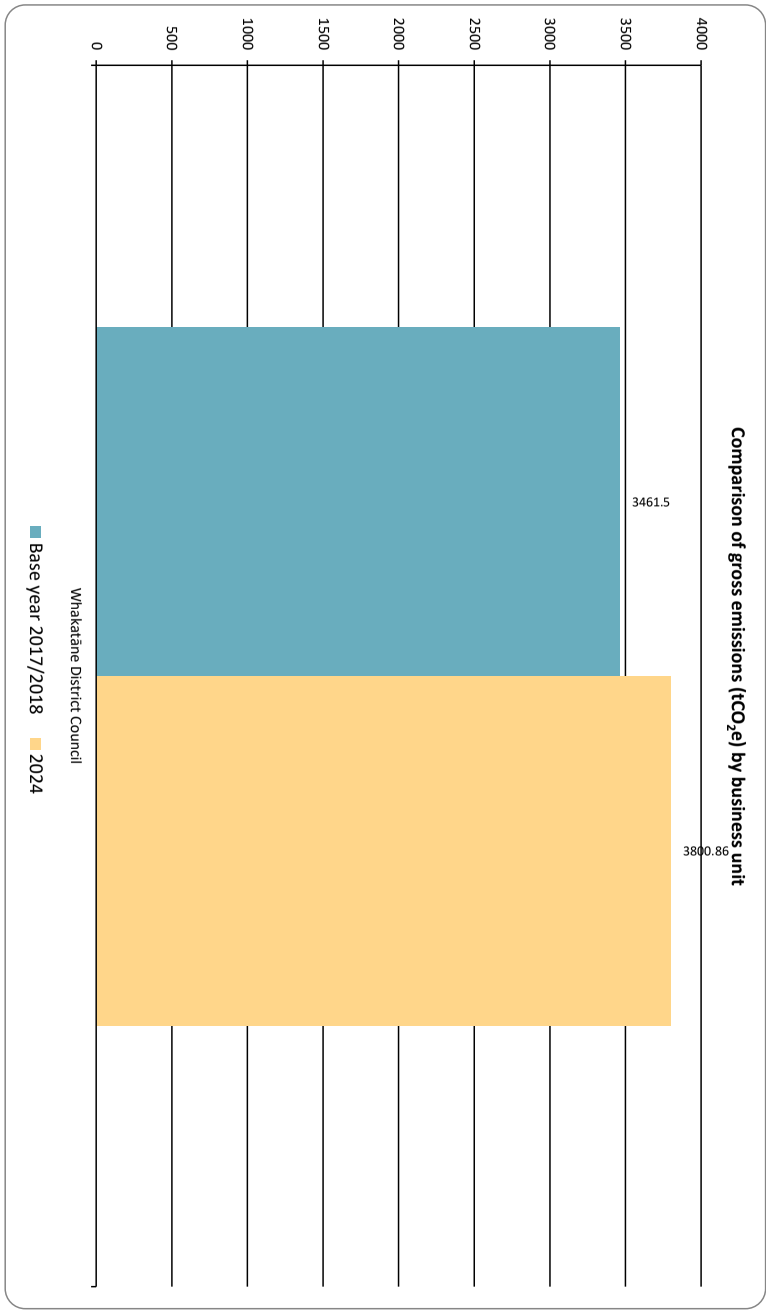


Figure 8: Comparison of gross emissions (tCO_2e) by business unit between the reporting periods

7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report(Cont.)

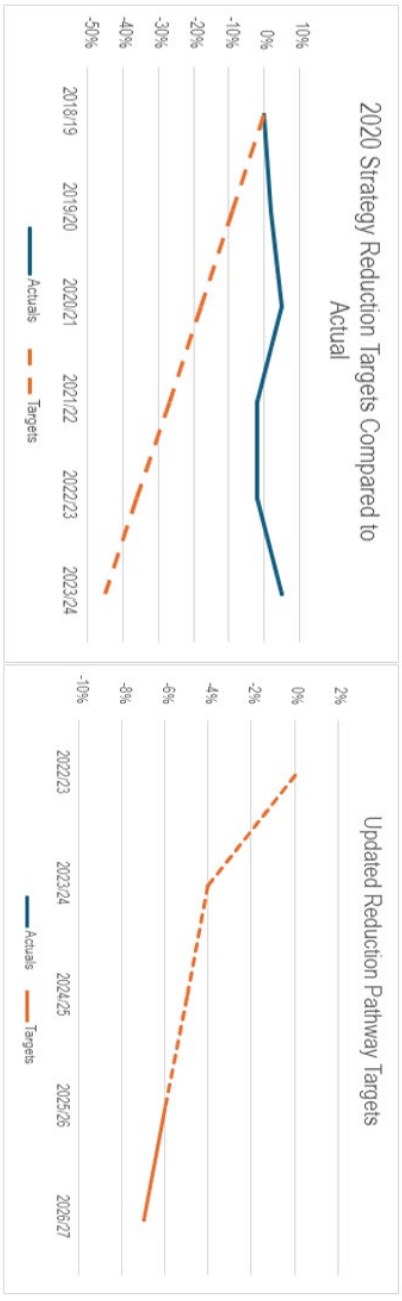


Figure 9: Performance against target since base year

Table 6. Performance against plan

Target name	Baseline period	Target date	Type of target (intensity or absolute)	Current performance (tCO_2e)	Current performance (%)	Comments
Energy Action Plan target: Council will deliver the benefits of 1.8GWh p.a energy savings from the 2018 baseline.	2018	1/07/2022	Absolute	4.86GWh	45.8% decrease	As no further targets were set, this report compares this target to 2023-24 year. Significant reductions were made within energy usage. Measurement in GWh.
Strategy target: Council will reduce its carbon footprint by 15% by 2022, excluding biogenic methane and nitrous oxide	2018	2/07/2022	Intensity	1141tCO_2e	29% decrease	These are the emissions profile with the wastewater emissions removed. We have experienced a reduction from our baseline of 2018.
Net Carbon zero excluding biogenic methane and nitrous oxide	2018	2030	Absolute	Not monitored	Not monitored	This target has been updated as of June 2024 (end of monitoring period). The target was changed to be more realistic.
Organisational biogenic methane emission reduction of 24% to 47% by 2050	2018	2050	Intensity	Not monitored	Not monitored	This target has been updated as of June 2024. No progress was made.

2.2. SIGNIFICANT EMISSIONS SOURCES

Significant sources

The top three sources of emissions make up 80% of the Whakatāne District Council's total emissions profile. These are listed below, along with a discussion of how Council is considering opportunities to reduce these emissions.

1) Wastewater treatment plants:

As a provider of wastewater treatment services to a District of about 40,000 people, it is known that this is a large source of greenhouse gas emissions for the Council. Most of Council's wastewater consents expire in 2026, and projects are underway to understand upgrades that will be required as part of this process. The upgrades will allow Council to head toward 'least-carbon' treatment options and provide opportunities to explore the capture and conversion of biogas into usable energy, along with other improvements to reduce greenhouse gas emissions from this activity.

2) Electricity and electricity T&D losses:

Electricity is used for administrative services and the large range of public facilities and services the Council maintains. The Council has had an Energy Management Programme since 2018 which identifies and implements a range of energy saving and emission reduction initiatives. This programme is run with continued collaboration with the Energy Efficiency and Conservation Authority (EECA) and Council's energy management contractor EMSOL. There have been noticeable reductions of electricity usage over the years.

3) Diesel

Diesel is used in a variety of critical Council operations. These include maintenance such as for the gardens and parks which often requires trailers or a significant amount of equipment to be transported around. Other activities include inspections of roads or accessing remote areas. Lastly, diesel generators and Utes are critical in emergency management and response.

Activities responsible for generating significant emissions

Wastewater treatment plants: the two largest sources of emissions are methane emissions from oxidation ponds, and nitrous oxide from wastewater discharges.

Electricity and electricity T&D losses: most Council business units use electricity as a significant (if not their main) source of power.

Diesel: Ute vehicle usage within everyday operations and within emergency management or response.

Influences over the activities

Wastewater treatment plants: Council estimates that the districts population will continue to grow in the future. This will increase both methane emitted from oxidation ponds, and nitrous oxide from discharges.

Electricity: As a main power source for many services and business units within Council and with a conscious effort to increase electric cars, virtual meetings and services, this may lead to increased electricity usage.

Diesel: This is required in many 4WD vehicles which is critical to Council operations.

Significant sources that cannot be influenced

Wastewater is extremely hard to reduce, small incremental changes can be made however they are large old assets. While the Council is actively exploring and trying to reduce these emissions, they are significant assets and changes will take many years.

There will always be some form of diesel usage as there is no other viable options during emergency response i.e. generators or large 4WD vehicles to drive in inaccessible areas.

2.3. EMISSIONS REDUCTION TARGETS

The organisation is committed to managing and reducing its emissions in accordance with the Programme requirements. Table 7 provides details of the emission reduction targets to be implemented. These are 'SMART' targets (specific, measurable, achievable, realistic, and time-constrained).

In September 2020, the Council adopted its first Climate Change Strategy. The overarching emission reduction target for the Council was to become a net zero carbon organisation by 2030 (excluding biogenic methane and nitrous oxide). The short-term mitigation target was a 15% emission reduction by 1 July 2022 (excluding biogenic methane and nitrous oxide). A specific biogenic methane target was set in line with national targets, striving for a 24% to 47% biogenic methane emission reduction by 2050. The Energy Action Plan also set out an energy specific reduction target of 1.8GWh per annum reduction by 1 July 2022.

New targets have been set this past year, to be more achievable and reflect the capability and capacity of Council resources. The new targets follow the Climate Change Commission demonstration path and use 2023 as the baseline. As the new targets were adopted in June 2024, this report will still refer to the 2020-23 targets.

Due to the broad nature of the Council's Climate Change Strategy and the connection it has to all of Council's operations and activities, the strategy and action plans are reviewed every 3 years (or earlier if required). As they have just been reviewed in this past reporting period, the targets will not be reviewed again until 2027.

Council had four overarching climate change targets, two of which are long term and the two others short term.

Long term:

1- Be net zero (excluding biogenic methane and nitrous oxide) by 2030.

2- Reduce organisational biogenic methane emissions by 24% to 47% by 2050.

These were not monitored closely, and the targets were too far out of reach. The Council is building better understanding about reporting and data. This means, the nature of the targets is evolving as the Council gets a clearer picture of their emissions profile.

Short term:

1- Delivering benefits of 1.8GWh per annum of energy savings

This ambitious target aimed to deliver benefits of 1.8GWh p.a. of energy savings, down from the 8.9GWh that was recorded within Council in 2018. In the last financial year, the total energy (electricity and natural gas) output by Council was 4.9GWh, representing an average reduction of 0.7GWh per annum. Although the target of 1.8GWh p.a. from the baseline was not reached, Council made significant progress in energy savings. This shows that Council has become more efficient with energy usage. The Council will continue to decrease energy usage and embed these practises within the organisation.

2- Reduce Council's Carbon Footprint by 15%

Council has not met the target of reducing our carbon footprint (excluding biogenic methane and nitrous oxide) by 15% in 2023. This was calculated by removing the wastewater emissions from the total emissions. However, many one-off issues occurred, or more/better reporting is happening. The Council will be more deeply looking at its emissions particularly those which rose in this period. The new strategy and targets should also help correct this.

Targets 2024/25 until 2026/27

The Council set new targets and a new baseline in June 2024. These will be reported against from 2025 onwards. The new baseline is the 22/23 reporting period. The new targets follow the demonstration pathway and are detailed in Table 7.

Table 7. Emission reduction targets

Target name	Baseline period	Target date	Type of target (intensity or absolute)	Categories covered	Target		Responsibility	Rationale
Electricity & Natural Gas reduction	2018	1/07/2022	Absolute	Category 2	1.8 GWh	8.5GWh	Energy Action Group/ Energy Management programme	Reduction in total energy consumption through continued delivery of energy management programme and responding to recommendations identified through the Energy audit
Reduction of carbon footprint excluding biogenic methane and nitrous oxide	2018	1/07/2022	Intensity	Cat 1, 2, 3	15%	1627	Whole Council/ Energy Action Group	Reduction in carbon footprint through continued delivery of energy management programme and other emission reduction initiatives
Net Carbon zero excluding biogenic methane and nitrous oxide	2018	2030	Absolute	All		1889	Whole Council/ Energy Action Group	Achieved by ongoing identification and delivery of emission reduction initiatives and eventual emission offsetting
Organisational biogenic methane emission reduction	2018	2050	Intensity	Cat 1 & 3	24 to 47%		3 Waters/ TBD	Greenhouse gas reduction opportunities are considered alongside wastewater upgrades required to achieve new discharge consents in 2026.
Targets 2024-27								
1- Transport emission reduction	2023	30/06/2027	Absolute	Category 1, 3	399	5%	Whole council/Finance/procurement	Increase the electrification of the Council fleet, promote low-travel or low emission options.
2- Stationary/non-transport energy emissions reduction	2023	30/06/2027	Absolute	Category 1, 2, 3, 4	602.28	16%	Whole council/asset management/procurement	Continued energy efficiency/reductions.

Target name	Baseline period	Target date	Type of target (intensity or absolute)	Categories covered	Target		Responsibility	Rationale
3- Industrial Process and Product use (IPPU) emissions	2023	30/06/2027	Absolute	Category 1	36.63	1%	Asset Management	Changing of assets as they come up for renewal and their efficient use and ongoing upkeep.
4- Waste reduction	2023	30/06/2027	Absolute	Category 4	8.9	11%	Waste/Whole Council	Waste audits, internal awareness and promotion of waste reduction techniques.
5- Waste water reduction	2023	30/06/2027	Absolute	Category 1	2130.24	4%	Wastewater	Consideration of reduction within asset renewal and ongoing upkeep.
6- Total Council emissions reduction	2023	30/06/2027	Absolute	Category 1, 2, 3	2063.67	7%	Whole Council	Combination of all the above.

2.4. EMISSIONS REDUCTION PROJECTS

In order to achieve the reduction targets identified in Table 7, specific projects have been identified to achieve these targets, and are detailed in Table 8 below.

Table 8. Projects to reduce emissions

Objective	Project	Responsibility	Completion date	Potential co-benefits	Potential unintended consequences	Actions to minimise unintended consequence
Reduce emissions created from wastewater	Reduce storm water infiltration to the wastewater system - Council is continuing to undertake assessment of underwater wastewater network via CCTV inspection.	Glenn Cooper - Manager Three Waters	Ongoing	This not only reduces infiltration but adds longevity to the life of the asset.	This work requires high investment costs.	Projects will be included in asset management plans to secure funding through the Long-Term Plan process.

Objective	Project	Responsibility	Completion date	Potential co-benefits	Potential unintended consequences	Actions to minimise unintended consequence
Reduce emissions created from wastewater	At this stage we are in early stages of the planned phase any technologies to reduce emissions will be incorporated into treatment plant upgrades after a new Resource Consent has been granted.	Glenn Cooper - Manager Three Waters	Ongoing	OPEX cost savings, depending on technology.	High CAPEX cost of investing in new technology.	Further feasibility studies will be undertaken to weigh up best outcomes.
Minimise natural gas and LPG use	Fuel switching at sites which rely on stationary energy to electric. The Natural gas elimination study supports this work.	Michael Harris - Assets Manager	2030	By removing gas use at Council facilities, we will reduce emissions as well as deliver cost savings.	Loss of instant on demand heating (especially for water).	Research units that will be best suited for very cold days with little heat loss.
Minimise electricity use	Civic centre redevelopment project - including updating lights to be LEDs.	Michael Harris - Assets Manager	Ongoing	Reduces power costs for day to day running of the building.	Increase costs to the project. Higher initial costs as older inefficient units are replaced with more efficient units.	Identify actions that will have the biggest benefit compared to cost. Research on what replacement units to use – lifespan, cost of maintenance, cost of equipment and how efficient compared to cost.
Minimise electricity use	Monitoring electricity use with onsite sensors.	Michael Harris - Assets Manager	Ongoing	Identify power trends and abilities to adjust schedules to minimise costs, and increases the ability to identify equipment that is unsuitable.	Increase costs to the project. Higher initial costs as older inefficient units are replaced with more efficient units.	Identify actions that will have the biggest benefit compared to cost. Research on what replacement units to use – lifespan, cost of maintenance, cost of equipment and how efficient compared to cost.
Minimise electricity use	Reduce electricity related emissions from three waters infrastructure (pumping stations etc). High lift pumps have been upgraded to be more efficient. VSDs installed on some pumps.	Glenn Cooper - Manager Three Waters	Ongoing	Lower OPEX costing as the more efficient pumps would use less energy. This work will be key as we experience more flooding in the future.	High CAPEX costs for initial works. Embodied emissions from projects.	Feasibility studies undertaken.

Objective	Project	Responsibility	Completion date	Potential co-benefits	Potential unintended consequences	Actions to minimise unintended consequence
Minimise refrigerant leakage	Measured the refrigerants at different sites, and checked for leaks in systems.	Michael Harris - Assets Manager	Ongoing	Finding leaks early will reduce the amount of refrigerant discharged into the atmosphere. Will also improve air quality.	Higher cost if multiple leaks found at once – or if looking at new equipment to replace old equipment. It's cheaper to find a leak as soon as possible to prevent loss of refrigerant.	Exploring extra corrosion prevention and anti-vibration measures to help reduce leaks from happening again.
Minimise diesel (commercial) use for portable generators	Feasability study to fuel switch Nesi Diesel pump from diesel to electricity.	Glenn Cooper - Manager Three Waters	2025	OPEX cost savings. Improved air quality.	High CAPEX costing of investing in a new generator.	Identifying different market options and looking for external funding.
Minimise petrol and diesel use from fleet.	Transitioning fleet from diesel/petrol to EV and hybrid.	Georgia Mischefski-Gray- Strategy and Policy Analyst	Ongoing	OPEX cost savings from purchasing less fuel.	Increased electricity use.	Reducing electricity use from other sources. Feasibility into creating our own renewable electricity sources and renewable energy certificates. Staff education around reducing electricity use.
Minimise petrol and diesel use from fleet.	Encouraging work from home - hybrid working policy.	Georgia Mischefski-Gray- Strategy and Policy Analyst	Ongoing	Cost savings of less electricity use. Commuting cost savings for staff.	Less use of facilities.	Staff survey will be undertaken for the next footprint to inform the emissions associated with staff commuting.
Reduce emissions created from electricity generation	Solar feasibility study - to investigate how we can generate renewable energy on Council owned facilities.	Georgia Mischefski-Gray- Strategy and Policy Analyst	2025	Showing leadership within our community. Revenue generation once investments have been paid off.	Embedded emissions and environmental impacts from the lifecycle of panels (cradle to grave emissions).	Solar projects will be explored, Part of this will look at minimising embedded emissions from the creation and recycling of materials.

Table 9 highlights emission sources that have been identified for improving source the data quality in future inventories.

Table 9. Projects to improve data quality

Emissions source	Actions to improve data quality	Responsibility	Completion date
All sources	Break the airport data up in audit by the business units. Explore the flight related data.	Georgia Mischefski-Gray	31/12/2024
Scope three emissions	Undertake a staff wide survey to better understand commuting and work from home emissions.	Georgia Mischefski-Gray	31/12/2025
All sources	Procurement policy being updated which will explore freight/supply chain reporting.	Georgia Mischefski-Gray and Ingrid McNiven	1/06/2025

The emissions inventory chapter identified various emissions liabilities (see GHG Storage and liabilities section). Table 10 details the actions that will be taken to prevent GHG emissions from these potential emissions sources.

Table 10. Projects to prevent emissions from liabilities

Liability source	Actions to prevent emissions	Responsibility	Completion date
Air conditioning units	Regular servicing to preventing damage to units	Facilities manager	Ongoing
Air conditioning units	Ensuring units with lower GWP refrigerants are purchased.	Facilities manager	Ongoing
Diesel	Ensure generators are regularly serviced	Facilities manager. Three waters manager	Ongoing
Diesel	Explore electric options for generators	Facilities manager. Three waters manager	Ongoing
Natural Gas	Explore the reasons for increases and how to prevent these occurring.	Facilities manager. Three waters manager	Ongoing
Refrigerants	Anti-vibration work and continual monitoring, upgrading to better systems	Facilities manager	Ongoing
Forestry	Exploration of other options, some blocks will be felled in the next few years.	Open spaces	Ongoing
Fuel Tanks	Upgrades and monitoring.	Various	Ongoing

2.5. STAFF ENGAGEMENT

The Council is committed to regular, six-monthly reporting on the progress made towards our climate change targets, goals and actions set through our Climate Change Strategy and six action plans. These reports are publicly available on the Council's website: https://www.whakatane.govt.nz/residents/climate-change/climate-change-reporting. Since the start of the Council's Climate Change Strategy, celebrating our wins along the way has been an important principle on our climate change journey. To achieve this, specific climate change case studies have been developed, available on our climate change page:

https://www.whakatane.govt.nz/climate-change/case-studies. These case studies have been shared widely both internally with our staff and elected members and externally with our stakeholders and partners.

For general awareness and training purposes around climate change, the Council has developed a climate change e-learning hub, publicly available on our website: https://www.whakatane.govt.nz/climate-change. The purpose of the hub is to provide the public, as well as Council staff, with a library of information and resources that cover a variety of climate change-related topics. The modules have been designed to be a source of accurate and engaging information on climate change and include YouTube clips, TED Talks, scientific articles, academic research, recent publications and reports.

Since April 2021, all Council reports now include a climate change assessment. Internal staff training around Council's climate change programme, including our own Council specific mitigation targets, has been provided to regular report writers.

The Council has an internal Climate Change Group representing teams across the organisation, to ensure that climate change considerations are embedded into all Council activities. Council has an analyst whose role includes climate change, and a new 'Climate and Resilience' team has been included in the Long-Term Plan with an expected establishment in early 2025.

2.6. KEY PERFORMANCE INDICATORS

One of the Councils KPI's is the yearly rating units. The Whakatāne district is currently experiencing low to moderate population growth. This is measured and forecast by anticipated increases in rating units over time. This growth is applied as a form of KPI to monitor performance.

2.7. MONITORING AND REPORTING

The Environment, Energy and Resilience Committee will continue to oversee the wider Climate Change Strategy and receive regular updates on progress. The committee monitors progress towards its targets, goals and actions. Reports are provided to the Committee six-monthly and are publicly available on Council's website: https://www.whakatane.govt.nz/climate-change. A section relating to climate change activities will be included in the annual report following each financial year.

APPENDIX 1: DETAILED GREENHOUSE GAS INVENTORY

Additional inventory details are disclosed in the tables below, and further GHG emissions data is available on the accompanying spreadsheet to this report (Appendix1-Data Summary Whakatāne District Council.xls).

Table 11. Direct GHG emissions and removals, quantified separately for each applicable gas

Category	CO_2	CH_4	N_2O	NF_3	SF_6	HFC	PFC	Desflurane	Sevoflurane	Isoflurane	Emissions total (tCO_2e)
Stationary combustion	269.27	0.62	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	270.02
Mobile combustion (incl. company owned or leased vehicles)	436.36	1.37	7.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	444.92
Emissions - Industrial processes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Removals - Industrial processes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Leakage of refrigerants	0.00	0.00	0.00	0.00	0.00	179.70	0.00	0.00	0.00	0.00	179.70
Treatment of waste	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Treatment of wastewater	2,173.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,173.00
Emissions - Land use, land-use change and forestry	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Removals - Land use, land-use change and forestry	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fertiliser use	0.00	0.00	4.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.84
Addition of livestock waste to soils	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Addition of crop residue to soils	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Addition of lime to soils	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.07
Enteric fermentation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Open burning of organic matter	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Electricity generated and consumed onsite	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Medical gases	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Exported electricity	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total net emissions	2,878.70	2.00	12.15	0.00	0.00	179.70	0.00	0.00	0.00	0.00	3,072.55

7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report(Cont.)

Table 12. Non-biogenic, biogenic anthropogenic and biogenic non-anthropogenic CO_2 emissions and removals by category

Category	Anthropogenic biogenic CO_2 emissions	Anthropogenic biogenic (CH_4 and N_2O) emissions (tCO_2e)	Non-anthropogenic biogenic (tCO_2e)
Category 1: Direct emissions	0.00	0.00	0.00
Category 2: Indirect emissions from imported energy	0.00	0.00	0.00
Category 3: Indirect emissions from transportation	0.00	0.00	0.00
Category 4: Indirect emissions from products used by organisation	0.00	195.25	0.00
Category 5: Indirect emissions associated with the use of products from the organisation	0.00	0.00	0.00
Category 6: Indirect emissions from other sources	0.00	0.00	0.00
Total gross emissions	**0.00**	**195.25**	**0.00**

A1.1 REPORTING BOUNDARIES

A1.1.1 Emission source identification method and significance criteria

The GHG emissions sources included in this inventory are those required for Programme certification and were identified with reference to the methodology described in the GHG Protocol and ISO 14064-1:2018 standards as well as the Programme Technical Requirements.

Carbon sources were identified through communications with relevant staff leaders who oversee the broad range of services provided by Council. Different teams within Council often keep registers that help monitor carbon related activities - which they use to extract data following the end of the financial year.

Significance of emissions sources within the organisational boundaries has been considered in the design of this inventory. The significance criteria used comprise:

- All direct emissions sources that contribute more than 1% of total Category 1 and 2 emissions
- All indirect emissions sources that are required by the Programme.

(no answer provided)

A1.1.2 Included sources and activity data management

As adapted from ISO 14064-1, the emissions sources deemed significant for inclusion in this inventory were classified into the following categories:

- **Direct GHG emissions (Category 1):** GHG emissions from sources that are owned or controlled by the company.
- **Indirect GHG emissions (Category 2):** GHG emissions from the generation of purchased electricity, heat and steam consumed by the company.
- **Indirect GHG emissions (Categories 3-6):** GHG emissions that occur as a consequence of the activities of the company but occur from sources not owned or controlled by the company.

Table 13 provides detail on the categories of emissions included in the GHG emissions inventory, an overview of how activity data were collected for each emissions source, and an explanation of any uncertainties or assumptions made based on the source of activity data. Detail on estimated numerical uncertainties are reported in Appendix 1.

The various teams within Council have people that are responsible for monitoring and reporting on activities throughout the financial year. This data is stored within Council's databases and drawn upon when requested from the Strategic Policy team when writing this report.

Table 13. GHG emissions activity data collection methods and inherent uncertainties and assumptions

GHG emissions category	GHG emissions source or sink subcategory	Overview of activity data and evidence	Explanation of uncertainties or assumptions around your data and evidence	Use of default and average emissions factors	Pre-verified data
Category 1: Direct emissions and removals	Stationary combustion	LPG stationary commercial, Natural Gas distributed commercial	Assumed all supplier reports are accurate, and all energy used has been captured in our internal systems. There is a higher level of uncertainty in regard to the LPG gas, as the supplier changed ownership and there were some reporting issues, however, this should have been corrected.		No
	Mobile combustion (incl. company owned or leased vehicles)	Diesel, Petrol premium, Petrol regular	Assumed all supplier reports are accurate, and all additional fuel spent has been captured within our internal financial tracking systems.		No
	Leakage of refrigerants	HFC-134a, R-407C, R-410A	Assumed the invoices are correct, some do not include the gas leakage and therefore having to rely on our own measurements.		No
	Treatment of wastewater	WWTP sewage (tCO_2e)	Assumed the internal measurement system and calculations is correct.		No
	Fertiliser use	Fertiliser use Nitrogen	Assumed the supplier reports are accurate, and all fertiliser used has been tracked in our internal systems. Assumptions made around the percentage of Nitrogen/Dolomite within the fertiliser.		No
	Addition of lime to soils	Fertiliser use Dolomite, Fertiliser use Lime	Assumed the supplier reports are accurate, and all lime used has been tracked in our internal systems.		No
Overall assessment of uncertainty for Category 1 emissions and removals		40%	High		No
Category 2: Indirect emissions from imported energy	Imported electricity	Electricity - Annual factor	Assumed the reports from suppliers are correct.		

GHG emissions category	GHG emissions source or sink subcategory	Overview of activity data and evidence	Explanation of uncertainties or assumptions around your data and evidence	Use of default and average emissions factors	Pre-verified data
Overall assessment of uncertainty for Category 2 emissions and removals		7%	Medium		
Category 3: Indirect emissions from transportation	Business travel - Transport (non-company owned vehicles)	Rental Car average (fuel type unknown), Air travel domestic (average), Taxi (regular)	Assumed the reports from the suppliers are correct.	The internal claims system and the system which our suppliers use, does not yet track the fuel litres or kilometres travelled.	No
	Business travel - Accommodation	Accommodation - New Zealand	Assumed the reports from the suppliers are correct.		No
Overall assessment of uncertainty for Category 3 emissions and removals		37%	Medium		
Category 4: Indirect emissions from products used by organisation	Purchased goods and services	Paper (envelopes - white), Paper use - default	Assumed the reports from the suppliers are correct and that the calculations are correct.		No
	Disposal of solid waste - Landfilled	Waste landfilled LFGR Mixed waste	Assumed the calculations and methods of measurement from suppliers and internal staff are correct.		No
	Transmission of energy (T&D losses)	Electricity distributed T&D losses, Natural Gas distributed T&D losses	Assumed the reports from suppliers are correct.		No
Overall assessment of uncertainty for Category 4 emissions and removals		36%	Medium		

A1.1.3 Excluded emissions sources and sinks

Emissions sources in Table 14 have been identified and excluded from this inventory.

Table 14. GHG emissions sources excluded from the inventory

Business unit	GHG emissions source or sink	GHG emissions category	Reason for exclusion
Airport	Flight related emissions	Category 4	Whakatāne District Council does not have operational control over Air Chathams flight schedule. Therefore, flight related emissions are excluded from our footprint.
Waste	Solid waste emissions	Category 4	Community waste management services are contracted to Waste Management. As they are part of the Toitū Carbon Reduce Programme, emissions from these services are not currently included. We plan to include these in scope 3 emissions as we improve our reporting processes.
Leases	Commercial properties on council-owned land	Category 4	Council does not have authority to control what lessees do with the building, nor can Council introduce and implement operating policies at an operating level.
Staff	Employee work from home	Category 3	No data has yet been collected to understand how many days per week employees work from home.
Staff	Employee commuting	Category 3	No data has yet been collected to understand employee commuting
Freight	Purchase related emissions	Category 4	No data is collected on freight emissions.

A1.2 QUANTIFIED INVENTORY OF EMISSIONS AND REMOVALS

A1.2.1 Calculation methodology

A calculation methodology has been used for quantifying the emissions inventory based on the following calculation approach, unless otherwise stated below:

Emissions = activity data x emissions factor

(no answer provided)

All emissions were calculated using Toitū emanage with emissions factors and Global Warming Potentials provided by the Programme (see Appendix 1 - data summary.xls). Global Warming Potentials (GWP) from the IPCC fifth assessment report (AR5) are the preferred GWP conversion[5].

Where applicable, unit conversions applied when processing the activity data has been disclosed.

There are systems and procedures in place that will ensure applied quantification methodologies will continue in future GHG emissions inventories.

[5] If emission factors have been derived from recognised publications approved by the programme, which still use earlier GWPs, the emission factors have not been altered from as published.

A1.2.2 GHG Storage and liabilities

A1.2.2.1 GHG STOCKS HELD ON SITE

Refrigerants and fuels may be stored on site, but their accidental leakage or release could result in a large increase in emissions for that period. Refrigerants such as HFCs, PFCs and SF_6 are GHGs with high global warming potentials, so material volumes of these or fuel are reported as potential liabilities.

Table 15. Total storage as of year end with potential GHG emissions liabilities.

GHG gas stock held	Quantity	Unit	Potential liability (tCO_2e)
Diesel commercial	1,720.00	litres	4.61
HFC-32	30.00	kilograms	20.31
Petrol	40.00	litres	0.09
Pre-calculated (tCO_2-e) - Forest contingent liability	4,816.00	tonnes	4,816.00
Pre-calculated (tCO_2-e) - Forest potential liability	21,110.00	tonnes	21,110.00
R-407C	107.40	kilograms	174.44
R-410A	176.95	kilograms	340.36
Total potential liability			26,465.82

A1.2.3 Supplementary results

Holdings and transactions in GHG-related financial or contractual instruments such as permits, allowances, verified offsets or other purchased emissions reductions from eligible schemes recognised by the Programme are reported separately here.

APPENDIX 2: SIGNIFICANCE CRITERIA USED

Table 16. Significance criteria used for identifying inclusion of indirect emissions

Emission source	Magnitude	Level of influence	Risk or opportunity	Sector specific guidance	Outsourced	Employee engagement	Intended Use and Users	Include in inventory?
Electricity	>1%	Electricity is essential for Council to conduct most of its core functions. Despite this, Council does have the ability to consider energy source options that reduce greenhouse gas emissions (e.g. renewable energy). Council does have the ability to monitor electricity consumption through invoices and works with EMSOL to help monitor consumption and find options for improvement.	There is an opportunity to invest in renewable energy (such as solar panels), that may reduce costs in the future and contribute to a positive image for the Council.	GHG emissions are deemed as significant; however, this is preferable to alternative forms of energy - specifically natural gas and LPG.	Production of electricity produces GHG emissions (e.g. burning fossil fuels, etc)	Staff are encouraged to ensure devices and lights are off when not being used. Electricity efficient lights are selected in procurement.	Yes - this measure must be measured for Toitū and Toitū staff.	Yes
Accommodation	<1%	Depending on reason for travel, there may be options for staff to attend events electronically (via Zoom, or teams, etc.). However, there are some events where it is more beneficial for Council and the community to attend in person.	Possible reputational risk for spending funds on accommodation to attend events.	Not deemed as significant as indirect emissions are low.	Emissions from the accommodation activities.	Encouraging staff to attend electronically, unless in-person attendance has substantial benefits.	Yes - this measure must be measured for Toitū and Toitū staff.	Yes

Emission source	Magnitude	Level of influence	Risk or opportunity	Sector specific guidance	Outsourced	Employee engagement	Intended Use and Users	Include in inventory?
Air travel	<1%	Depending on reason for travel, there may be options for staff to attend events electronically (via Zoom, or teams, etc.). Staff could also travel via alternative means. However, there are some events where it is more beneficial for council and the community to attend in person. Furthermore, given the distance of some events, it is in Councils interest for air travel to save time and money.	Possible reputational risk for spending funds on flights to attend events.	Some airlines do offer optional flight offsets when purchasing tickets.	Emissions from the fuels used to power the planes	Staff are aware of Councils Climate Change Strategies - this encourages minimisation of flights when possible.	Yes - this measure must be measured for Toitū and Toitū staff.	Yes
Rental Car use	<1%	This is only done when travel is essential for staff activities.	No identified risk exposure.	Use electric or hybrid cars if possible.	Emissions result from fuel consumption.	Staff are aware of Councils Climate Change Strategies - this encourages minimisation of flights when possible.	Yes - this measure must be measured for Toitū and Toitū staff.	Yes
Taxi	<1%	This is only done when travel is essential for staff activities.	No identified risk exposure.	Use electric or hybrid cars taxis if possible.	Emissions result from fuel consumption.	Staff are aware of Councils Climate Change Strategies - this encourages minimisation of flights when possible.	Yes - this measure must be measured for Toitū and Toitū staff.	Yes

Emission source	Magnitude	Level of influence	Risk or opportunity	Sector specific guidance	Outsourced	Employee engagement	Intended Use and Users	Include in inventory?
Electricity T&D losses	>1%	Can minimise by consuming electricity that is produced close to council facilities.	Supply chain risks that could interfere with supply of electricity	electricity-related emissions lost from the transport and distribution of electricity	GHGs created in transmission and distribution of electricity	Staff are encouraged to ensure devices and lights are off when not being used.	Yes - this measure must be measured for Toitū and Toitū staff.	Yes
Waste Landfilled	<1%	Council provides recycling options to reduce the amount of waste sent to landfill.	Supply chain risk of access to landfills when they become compromised (unlikely)	Recycle and reuse products when necessary.	Emissions from waste in landfill and not having conditions to break-down naturally - often producing methane.	Signage on bins help and educate staff on types of products that can be recycled.	Yes - this measure must be measured for Toitū and Toitū staff.	Yes

APPENDIX 3: CERTIFICATION MARK USE

This certification mark is displayed in the Council's website at https://www.whakatane.govt.nz/about-council/toitu-envirocare-certification.

APPENDIX 4: REFERENCES

International Organization for Standardization, 2018. ISO 14064-1:2018. Greenhouse gases – Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals. ISO: Geneva, Switzerland.

World Resources Institute and World Business Council for Sustainable Development, 2004 (revised). The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard. WBCSD: Geneva, Switzerland.

World Resources Institute and World Business Council for Sustainable Development, 2015 (revised). The Greenhouse Gas Protocol: Scope 2 Guidance. An amendment to the GHG Protocol Corporate Standard. WBCSD: Geneva, Switzerland.

APPENDIX 5: REPORTING INDEX

This report template aligns with ISO 14064-1:2018 and meet Toitū carbonreduce programme Organisation Technical Requirements. The following table cross references the requirements against the relevant section(s) of this report.

Section of this report	ISO 14064-1:2018 clause	Organisational Technical Requirement rule
Cover page	9.3.1 b, c, r 9.3.2 d,	TR8.2, TR8.3
Availability	9.2 g	
Chapter 1: Emissions Inventory Report		
1.1. Introduction	9.3.2 a	
1.2. Emissions inventory results	9.3.1 f, h, j 9.3.3	TR4.14, TR4.16, TR4.17
1.3. Organisational context	9.3.1 a	
1.3.1. Organisation description	9.3.1 a	
1.3.2. Statement of intent		TR4.2
1.3.3. Person responsible	9.3.1 b	
1.3.4. Reporting period	9.3.1 l	TR5.1, TR5.8
1.3.5. Organisational boundary and consolidation approach	9.3.1.d	TR4.3, TR4.5, TR4.7, TR4.11
1.3.6. Excluded business units		
Chapter 2: Emissions Management and Reduction Report		
2.1. Emissions reduction results	9.3.1 f, h, j, k 9.3.2 j, k	TR4.14, TR6.18
2.2. Significant emissions sources		
2.3. Emissions reduction targets		TR6.1, TR6.2, TR6.4, TR6.6, TR6.8,
2.4. Emissions reduction projects	9.3.2 b	TR6.8, TR6.11, TR6.12, TR6.13, TR6.14, TR6.15
2.5. Staff engagement		TR6.1, TR6.9
2.6. Key performance indicators		TR6.19
2.7. Monitoring and reporting	9.3.2 h	TR6.2
Appendix 1: Detailed greenhouse gas inventory	9.3.1 f, g	TR4.9, TR4.15
A1.1 Reporting boundaries		
A1.1.1 Emission source identification method and significance criteria	9.3.1 e	TR4.12, TR4.13
A1.1.2 Included emissions sources and activity data collection	9.3.1 p, q 9.3.2 i	TR5.4, TR5.6, TR5.17, TR5.18,
A1.1.3 Excluded emissions sources and sinks	9.3.1 i	TR5.21, TR5.22, TR5.23
A1.2 Quantified inventory of emissions and removals		
A1.2.1 Calculation methodology	9.3.1 m, n, o, t	
A1.2.2 Historical recalculations		
A1.2.3 GHG Storage and liabilities		
A1.2.3.1 GHG stocks held on site		TR4.18
A1.2.3.2 Land-use liabilities	9.3.3.	TR4.19

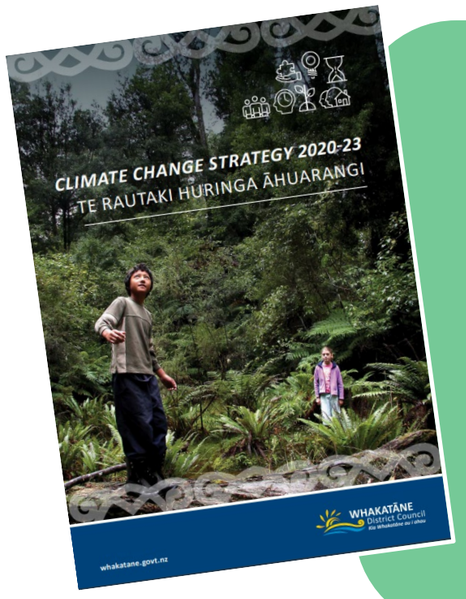
7.3.1 Appendix 1 - Toitū Audited Greenhouse Gas Inventory and Management Report(Cont.)

A1.2.4 Supplementary results		
A1.2.4.1 Carbon credits and offsets	9.3.3.3	
A1.2.4.2 Purchased or developed reduction or removal enhancement projects	9.3.2 c	
A1.2.4.3 Double counting and double offsetting		
Appendix 2: Significance criteria used	9.3.1.e	TR4.12
Appendix 3: Certification mark use		TR3.6
Appendix 4: References		
Appendix 5: Reporting index		

7.3.2 Appendix 2 - Six Monthly Climate Change Reporting

Six Monthly Climate Change Reporting

1 January– 30 June 2024



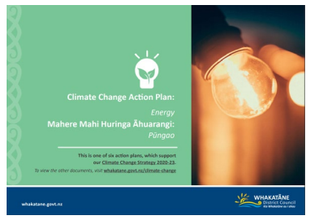
Six Monthly Climate Change Report 2024

About this report:

Whakatāne District Council adopted its Climate Change Strategy and six Action Plans in September 2020. These documents are available on Council's climate change page on: https://www.whakatane.govt.nz/climate-change

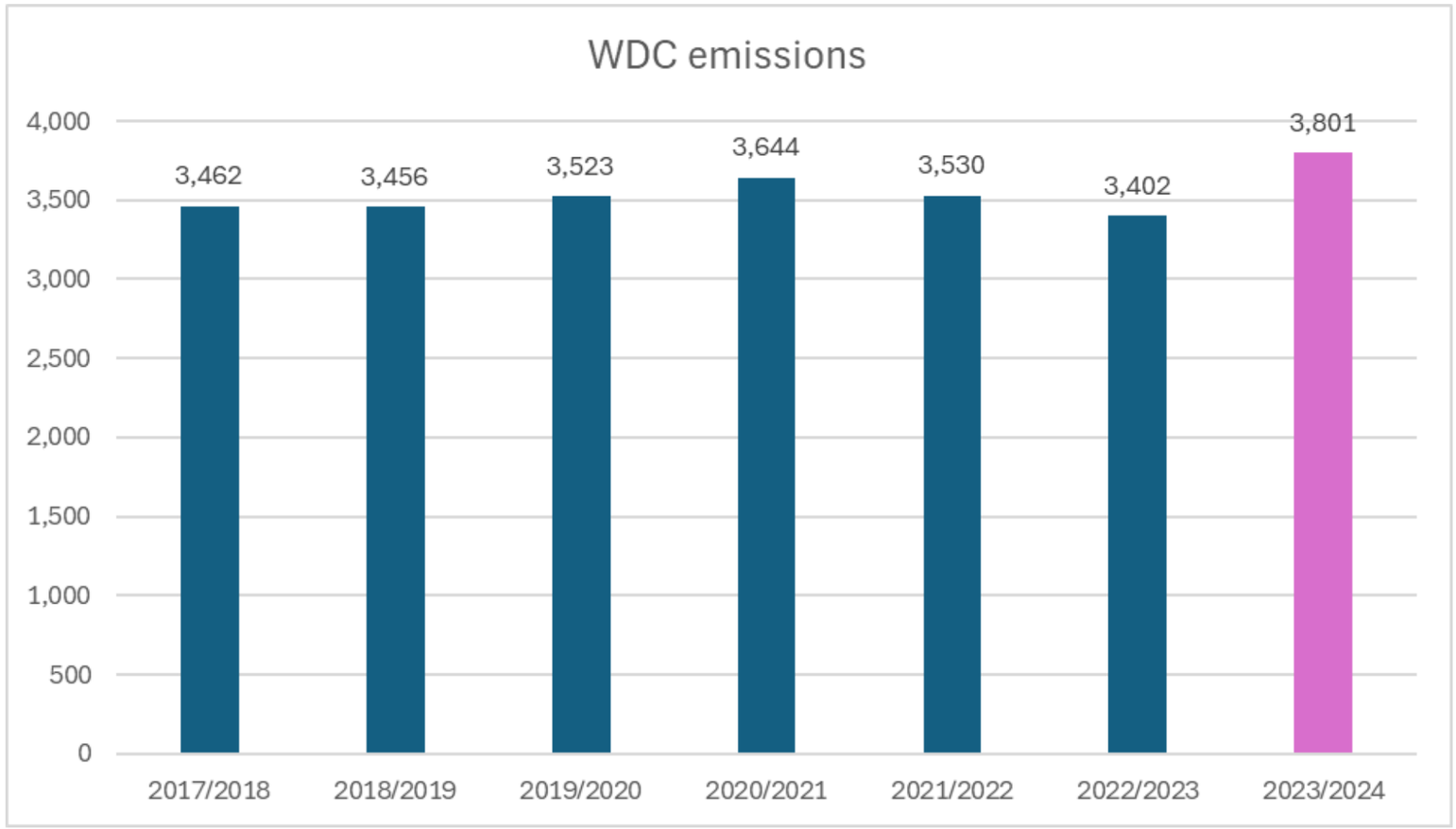
This Six-Monthly Climate Change Report covers the period 1 January– 30 June 2024, and summarises the progress made towards actions specified in the Council's six Climate Change Action Plans.

This report is the seventh and final report on the targets, goals and actions collectively agreed upon. Previous reports are available on Council's climate change page under climate change reporting: https://www.whakatane.govt.nz/about-council/council-projects/climate-change/climate-change-reporting



Energy Management Programme

1 July – 31 December 2023



This is the tonnes of CO2e (carbon dioxide equivalent) which WDC emits every year.

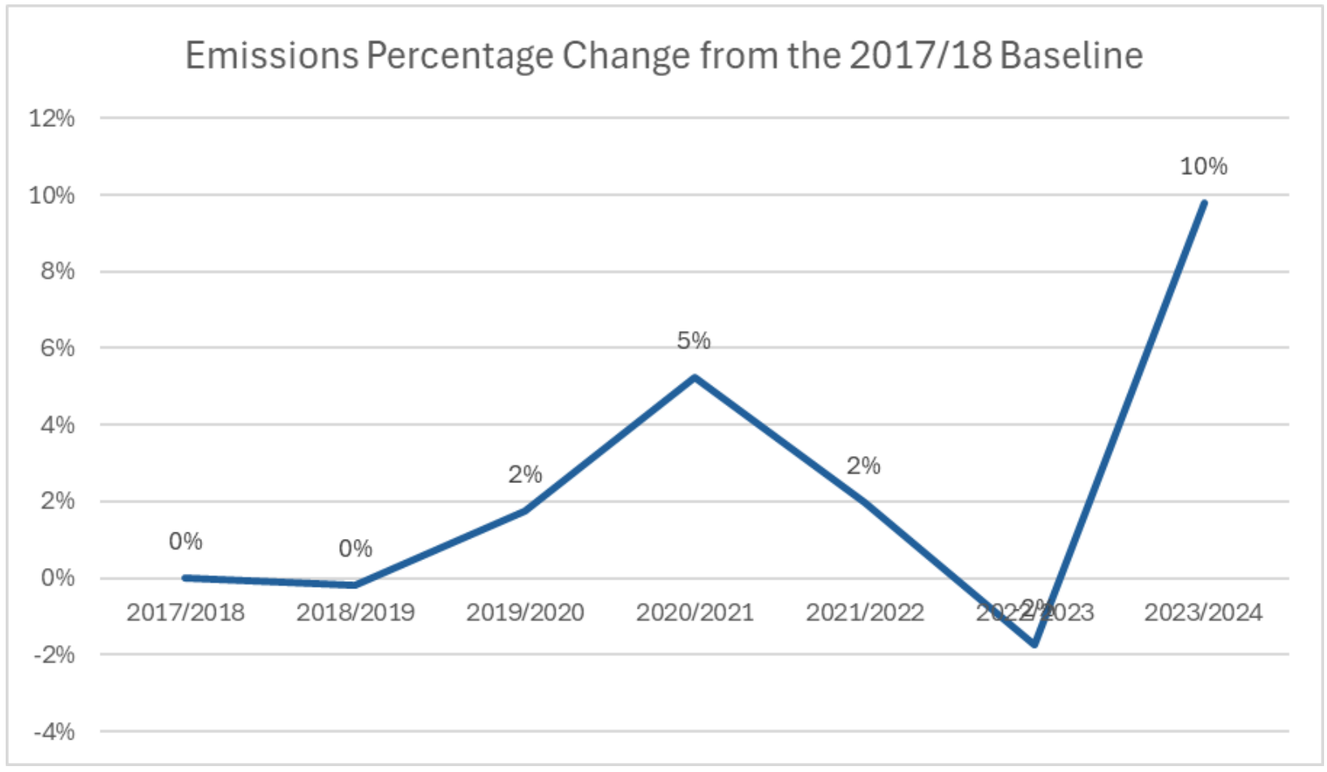
The reasons for the increase is detailed within the report.

The 3801tCO2e is equivalent to 14.06 million kilometres driving in a standard petrol car or driving up and down NZ which is 4190kms long (Cape Reinga to Bluff and back) 336 times.

This is approximate calculations.

Energy Management Programme

1 July – 31 December 2023



The 2023-24 financial year saw Council record a significant increase in carbon emissions of 10% since the baseline year in 2017/18.

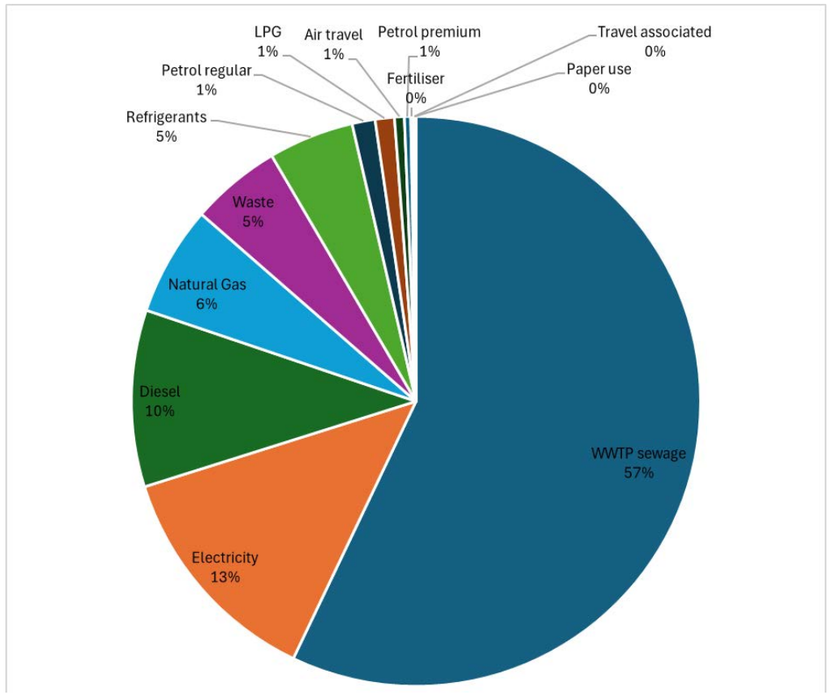
With seven years of reporting now complete, it must be noted that no material reductions have been made.

This is an increase of 12% from the previous year (2022/23).

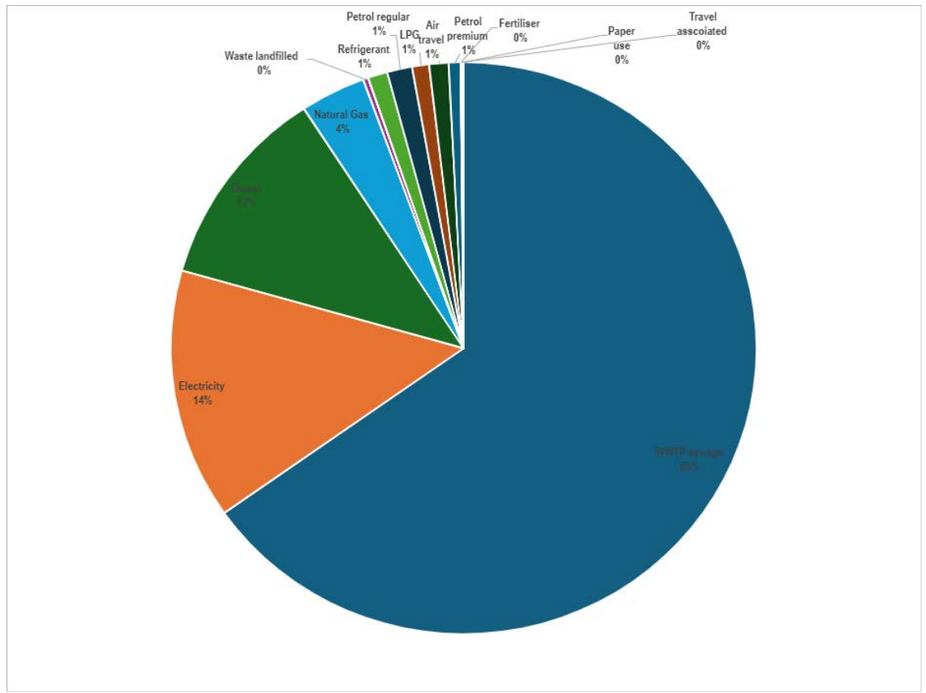
Energy Management Programme

1 July – 31 December 2023

Whakatāne District Council Emissions profile



2023/24

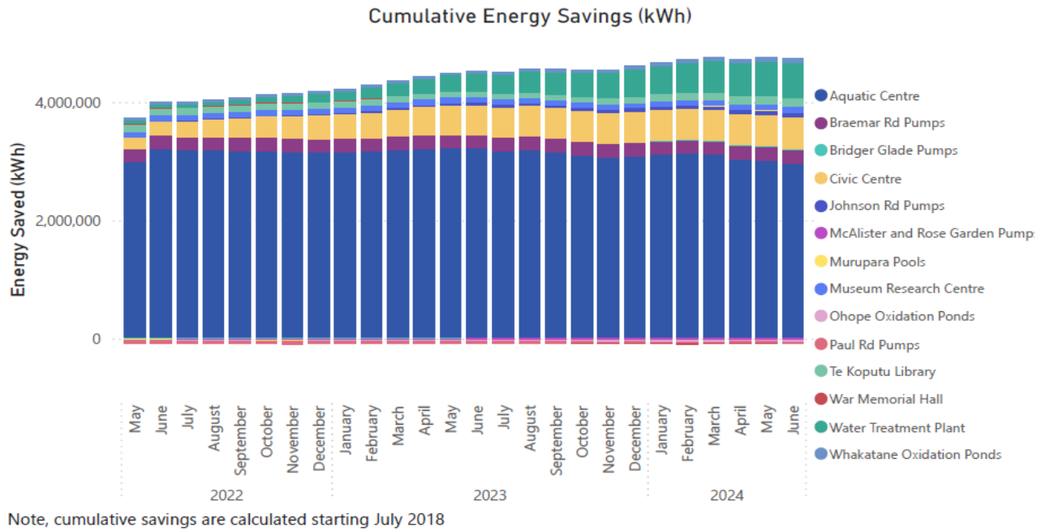


2022/23

Energy Management Programme

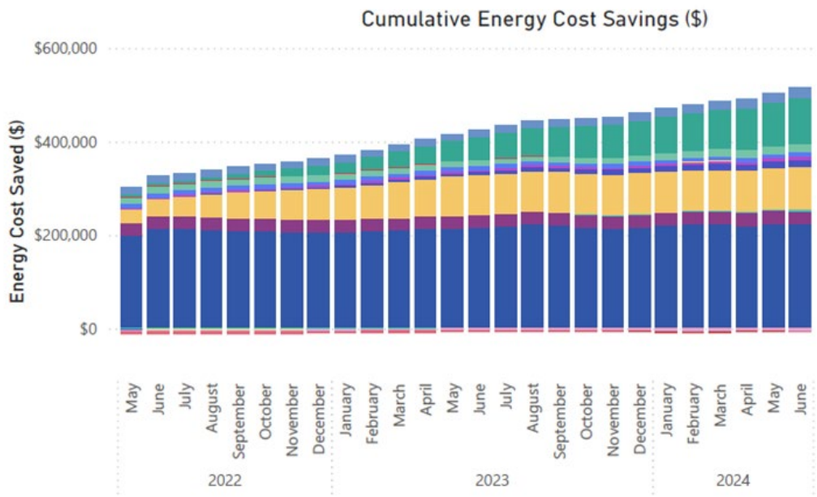
1 July – 31 December 2023

Whakatane District Council
Summary



Note, cumulative savings are calculated starting July 2018

Whakatane District Council
Summary



Note, cumulative savings are calculated starting July 2018

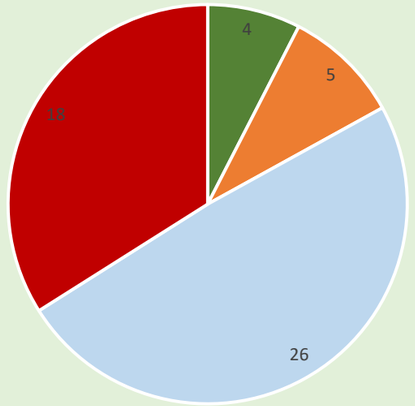
The two graphs are provided as part of EMSOL energy management reports and show our cumulative savings on the kWh and the costs ($).

Six Monthly Climate Change Reporting **1 July – 31 December 2023**

Action Plan Progression

July – December 2023

January to June 2024



There are 52 actions across six action plans. We are reporting on 48 actions as 4 have been completed prior to this reporting period.

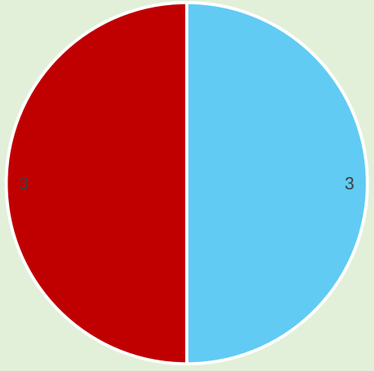
Key	
action progressing	action complete
action not started	action ongoing/BAU

Six Monthly Climate Change Reporting

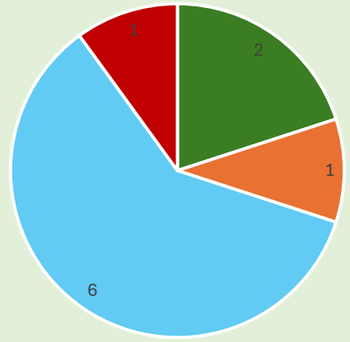
1 July – 31 December 2023

Leadership

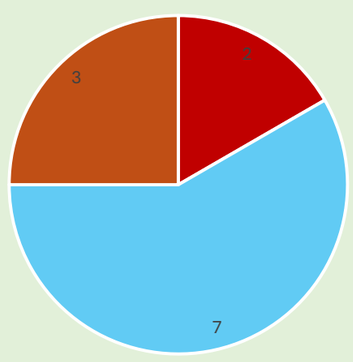
Waste and Circular Economies



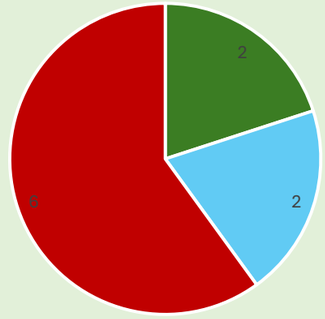
Transport



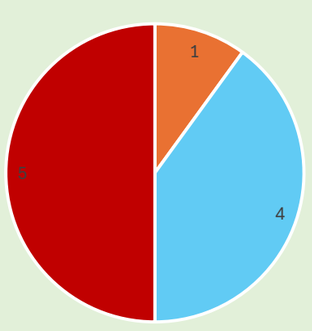
Land use and Build Environment



Energy



Water Services



Key	
action progressing	action complete
action not started	action ongoing/BAU

whakatane.govt.nz/climate-change

WHAKATĀNE District Council
Kia Whakatāne au i ahau

7.

7.4 Climate Change Strategy 2024-27 - Action Implementation Update

To:	**Environment, Energy and Resilience Committee**
Date:	**Thursday, 7 November 2024**
Author:	**G Moore-Jones/Strategic Advisor and G Mischefski-Gray/Strategic Policy Analyst**
Authoriser:	**L Woolsey/Acting GM Strategy and Transformation**
Reference:	**A2769168**

1. Reason for the report - *Te Take mō tēnei rīpoata*

The purpose of this report is for the Energy, Environment and Resilience Committee to note and discuss the status of implementation of the Actions contained in the Whakatāne District Climate Change Strategy 2024-27.

2. Recommendation- *Tohutohu akiaki*

THAT the Whakatāne District Climate Change Strategy – Action Implementation Update November 2024 report be **received**.

3. Background - *He tirohanga whakamuri*

In June 2024, Council adopted 'Our Climate Pathway', the first community Climate Change Strategy, and a refresh of the Council's 2020 Climate Change Strategy to cover the period 2024-27. The Pathway represents Council's proactive approach to addressing climate change with and on behalf of the district and is the Strategy by which both Council and community commits to decarbonisation (mitigation) and adaptation.

This paper represents the first update on progress towards implementing the Actions and Goals contained within the Strategy. The paper also identifies the actions from the Strategy to be taken over the coming period and which of the three Strategy Goals they most closely contribute to.

Whakatāne District Council's Long-Term Plan (LTP) 2024-34 notes that addressing climate change is a key priority. This includes both decarbonising, to mitigate and slow the impacts of climate change, and adaptation, to prepare for the worst of the effects. The LTP also notes that capacity and resources are limited, requiring Council to be strategic in developing collaborative action plans alongside community partners (LTP 2024-34, Climate resilience, pp.67.). The work started and reported on from 22nd July 2024 reflects the context of the LTP statement.

4. Subject – Kaupapa

The Our Climate Pathway implementation work has focused on organising the pathway actions into logical, resourceable and chronologically achievable parts. It creates a high-level map of how the pathway actions should be implemented, considering what is viable, appropriate, and involving the 'community-led' actions in a way that Council enables but does not 'do' those set of actions.

The implementation framework has a 3-year horizon since the Pathway is scheduled for review in 2027. For these three years, the aim is firstly for the community, stakeholders, and partners to hear echoes of what they said and submitted in the strategy development and adoption and then embed and report on the prioritised actions.

4.1. Vision: Working together towards sustainable, low emission, climate resilient communities.

Staff have been working to create an action plan which can be implemented over the coming years. Two key elements shape the center of the plan, adaptation and decarbonisation (mitigation). The diagram below shows the relationship between the two and how these two workstreams intersect and feed into Council processes.

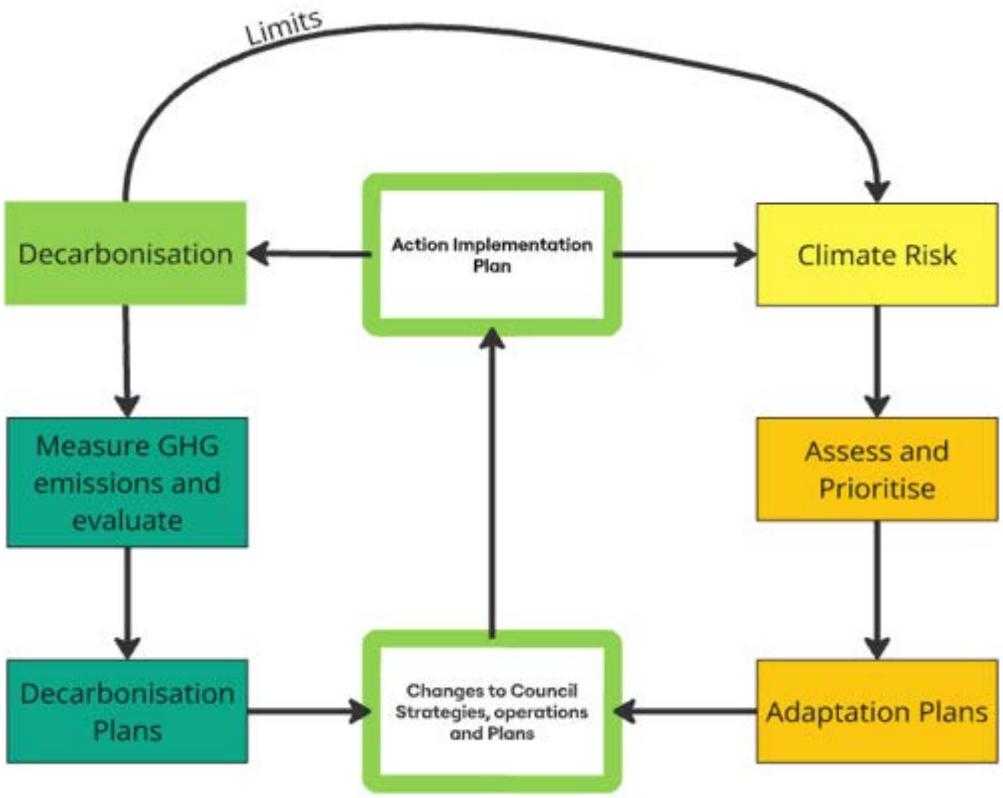


Figure 1. The intersection of the action plan, decarbonisation, adaptation and how these ultimately feed back into Council.

4.2. Internal framework for implementation:

Figure 2. Elements involved in the implementation for each action.

4.3. Overview of progress since July:

- The 229 Actions have been analysed to further 'group' them into logical headings and council responsibilities (significant mahi went into this through the development stage and specifically using the Multiple Criteria Analysis – MCA) in the context of capacity and resources available.
- Staff that have a stakeholder interest in the Strategy have been met with and where possible 'action ownership' has been established.
- Relevant external stakeholders have been contacted.
- The Combined Community Boards have been introduced to and updated on the implementation process and meetings are being arranged to attend individual Community Board meetings to discuss further.
- Actions such as procurement policy updates, a business case for Council facility solar panelling, e-learning modules, a matched contestable community climate fund with Trust Horizon and a Council Workride scheme are being developed.

4.4. Priority actions: The 'A' List

Over the last 8-weeks the 229 Pathway Actions have been reviewed and collated to establish an 'A' list of priority actions (Appendix 1). The actions are identified into an A and B list, rather than years as many will overlap and depend on organisational workplans and budgets.

The 'A' list represents those actions that set the Council up to succeed. There is a strong relationship between the 'A' list and those identified in the adopted Strategy as low cost and early wins or actions that fundamentally address decarbonisation within Council's control and work programmes. The 'A' list is made of actions identified as already being developed or are planned to be actioned in years 1 and 2 of the LTP.

The 'B' list under development now and to be reported on in February 2025 is dependent upon the 'A' list to be 'under way' first, and hence they describe the chronological order of the Implementation Framework.

Council's role will be to enable, assist in community education on related topics, and communicate with the wider community what type of actions are possible (and they may wish to undertake). It is not within Council's capacity or resources to monitor, measure or report on all the community-led actions. As part of the implementation plan a contestable Climate Change Fund will be implemented to enable those community-led actions to be partially resourced. Staff are not intending to actively identify community-led groups or to be proactively involved in those actions.

The Implementation acknowledges that the Council is taking a lead in the climate change area and must be seen as a role-model in putting actions into practice. The Council is, by visibility and placement in the community, leading the organisational actions in the Strategy. The 'A' list of actions represents those that can be started now (or have started), whilst the large number of community-led actions require further mechanisms or processes and sit with the community.

The 'A' List (Appendix 1) is described below and broken down for each Climate Change Goals of the strategy:

4.4.1. Goal 1: We all understand and can act on climate change and its impacts

Understanding the impacts of climate change is critical to ensure the right actions occur. The initial A list relating to Goal 1 which are already being worked on include:

- E-learning module on Jemini.
- Update to the Whoogle page.
- Update to the reporting assessment in the Council report template.
- Understanding the previous year (2023/24) Council emissions and socialising these results.
- Process of engaging with Community Boards as part of pathway for community led actions.
- Participation in Council's The Amazing Race where community actions for climate change impacts were socialised.
- Subsidised home composting scheme round 2.

4.4.1.1. Future focus:

- The immediate future focus is on embedding the actions and developing a framework for delivery.
- Restructure the climate change team and associated groups.

- Create an in-person climate change induction, to be led by the newly structured climate change team.
- Researching and identifying a measurement and reporting tool for organisational actions (as an example the Genuine Progress Indicator – GPI spider web approach).

4.4.1.2. Foreseen potential risks:

- Challenges around gaining traction, identifying action owners and the differing knowledge and skillsets within the Council.
- Identifying appropriate and 'capable' community groups who have capacity to pick up and lead actions.

4.4.2. Goal 2: We have prioritised a just transition to low emissions.

The Council is aiming to embed the principle of a just transition to low emissions within their work streams. A just transition is essential to prevent the long-term effects of climate change. We must drastically decrease our emissions through decarbonisation. The initial "A list" of actions relating to Goal 2 which are already being worked on include:

- Development of a solar business case for Council buildings.
- Procurement policy updates to include a broader outcomes section.
- Vehicle policy update to align with the new strategy and actions.
- Energy efficiency monitoring and exploration of upgrading key energy infrastructure.
- Workride scheme to enable staff to bike to work.
- A forestry block action plan to allow for better oversight and management of the blocks.

4.4.2.1. Future Focus:

- Develop an internal climate change policy and concurrently update the energy management policy.
- Develop an emissions reduction road map (Decarbonisation plan) using the targets set in the strategy and the LTP. Incorporate asset management changes and upgrades.
- Identifying potential partners and structure including scholarship opportunities for the contestable Community Climate Change Fund.

4.4.2.2. Foreseen potential risks:

The potential risks are:

- A just transition is un-defined by the strategy. Just transitions are different for every community, organisation and environment. MBIE completed research into just transitions in Aotearoa and identified four key characteristics. These characteristics will be used to guide decision making within the Strategy:

i. A just transition can restore and rejuvenate mauri life force to bring social, economic and environmental systems and supports into balance.
ii. It addresses injustices.
iii. It is inclusive and based on shared principles, values and visions.
iv. Its outcomes support oranga wellbeing for all.

- Other risks include the lack of resources, time, and capability.

4.4.3. Goal 3: We will continue to adapt, to reduce the effects of Climate change.

Adapting to the effects of current and a changing climate is critical for the future of our communities. In addition to responding and recovering from historic climate events, a considerable amount of work has been undertaken to understand the impacts from a range of potential future climate scenarios. A 5-stage District-wide Climate Adaptation Programme supported by national and regional climate change programmes was approved by the Council in February 2024. This Action Implementation Plan links the current adaptation work to the current Strategy. The following is underway:

- Stage 1 of this programme is a technical assessment of climate risks to the Whakatāne District that will enable decision makers to make informed decisions on priorities and resource allocation for adaptation responses. Community participation to utilise local knowledge to identify specific local climate risks is currently underway.

4.4.3.1. Future focus

The District Risk Assessment is scheduled to be completed early in 2025 this will be followed by:

- Stages 2: prioritising climate risks through an extensive community engagement programme and Council workshops.
- Stage 3: developing local community adaptation plans for priority risks. Local adaptation plans will include defining both specific climate impacts for monitoring, and thresholds at which interventions are required. Stages 2 and 3 are planned to be completed by the end of 2025.

4.4.3.2. Foreseen potential risks

Potential risks to Stage 1 of the Climate Change Adaptation include:

- Completion timeframe due to extended community participation in response to feedback from each of the Community Boards around preferred engagement.
- Additional project costs due to additional engagement.
- Once finalised, release of natural hazard modelling information will require sensitivity.
- Due to scale, a full exploration of all cascading climate risks is beyond the scope of the Stage 1 Risk Assessment. Ensuring that assessment findings are integrated into internal and external decision-making processes is crucial for translating knowledge into action.

5. Options analysis - *Ngā Kōwhiringa*

No options have been identified relating to the matters of this report.

6. Significance and Engagement Assessment - *Aromatawai Pāhekoheko*

6.1. Assessment of Significance

The decisions and matters of this specific report are assessed to be of low significance in accordance with the Council's Significance and Engagement Policy. However, several actions included as part of the implementation of the Climate Change Strategy are assessed to be of moderate significance.

6.2. Engagement and community views

Significant community and stakeholder engagement was undertaken during the process of developing the Whakatāne District Climate Change Strategy 2024-27 and the subsequent action list. This included specific communications, surveys, relevant input groups (youth, technical, community). Community views were also taken from LTP engagements.

Engagement on this report is not being undertaken in accordance with Section 4.2 of the Council's Significance and Engagement Policy. This states that the Council will not consult when there is already a sound understanding of the views and preferences of the persons likely to be affected or interested in the matter.

7. Considerations - *Whai Whakaaro*

7.1. Financial/budget considerations –

While this report does not contain any costs or financial considerations associated with it, each individual action may have associated costs. These will have to be considered as they come up. Many of the actions have been selected due to the low cost associated or have already been budgeted for within the LTP 24/34.

There are no budget considerations associated with the recommendations of this report.

7.2. Strategic alignment

This report is aligning with and implementing the Whakatāne District Climate Change Pathway (Strategy) 2024-27.

7.3. Climate change assessment

The subject of this update is the implementation of climate strategy actions; the climate change implications have already been taken into consideration. The actions associated should have positive climate impacts.

Based on this climate change assessment, the decisions and matters of this report are assessed to have high climate change implications and considerations, in accordance with the Council's Climate Change Principles.

7.4. Risks

While there are no directly associated risks from this report, there are risks associated with not actioning the strategy. These include:

- Adverse effect on the community (economic, social, environmental, or cultural).
- Climate change impacts.
- Publicity/public perception.
- Health and safety.

8. Next steps - *Ahu whakamua*

1. During the next 3-month period, action owners (internal) and where known community-led groups (self-identified) will be approached to confirm progress plans. Progress will include an organisational common measurement and reporting system that is currently under draft development.
2. Embedding the 'A' List actions will lead to development of the 'B' list, many of which are dependent on the chronological order above.
3. Continuing to implement the actions which are already underway and beginning to work on the other actions identified in the A list.

Attached to this report:

- Appendix 1 - 'A' List

7.4.1 Appendix 1 - 'A' List

The A List Climate Change Action Plan

#	Action	Status	Commentary
4	Update Procurement Policy and procedures to factor in climate change		The procurement policy is currently under review and is going to incorporate 'broader outcomes' as a key metric.
12	Internal Climate Change Policy Development		This will be developed in Q2/Q3 and finalised in Q4.
16	Measure organisational carbon emissions		23/24 results complete. Currently exploring options for carbon emission measurements.
17	Incorporate a Climate Change Team into the organisational structure		This is being explored.
19	Develop a monitoring and evaluation framework for the Climate Change Strategy		This report and traffic light system is part of this. The framework will be continued to be developed in Q2.
20	Increase staff knowledge regarding climate change		Whoogle page updated, new staff module almost complete. Aim to increase to have in person inductions.
32	Develop District specific adaptation educational material		Once the risk assessments are complete, work in this space will be undertaken.
36	Develop a climate change targeted fund		To be explored in Q2.
66	Investigate renewable energy options for Council facilities		Business case research is underway.
105	Identify relevant sites/events and complete waste audits		To be started in Q2. Relevant sites and events will first be identified.
116	Encourage low-travel options		This is being embedded within our Vehicle policy. It will be looked at more thoroughly in Q3 and Q4.
118	Facilitate e-bike purchases		Currently being worked through, have presented to ELT and in final stages of planning.
126	Implement Active Whakatane Strategy		Ongoing input, but also dependent on ongoing levels of central govt funding.
153	Integrate climate change risk management into transport network		Major focus using data from the adaptation risk assessments due to be completed Q3.
156	Identify vulnerable transport infrastructure		Focus on building resilience into the network at this stage.
161	Identify District climate change risks		Underway in risk assessments.
162	Determine Council dynamic planning and risk management approaches		Underway in risk assessments.
166	Have local adaptation plans in regional and local spatial strategies		Development of plans underway with local communities. Embedding in strategies starts Q4.
170	Embed climate change in District plan		Work to start in Q4. Direction of action dependent on Govt changes to RMA.
206	Ensure emissions is a key part of three waters projects		
221	Factor climate change into all water takes, adapt accordingly		
225	Identify at risk and vulnerable water supply		
	Key:		To be Started
			Underway

7.4.1 Appendix 1 - 'A' List(Cont.)

#	Action	Status	Commentary
			Done
			Behind

7.5 Proposed Plan Change 4 – Amendments to the Building Platform Level for Flood Risk Management and Mitigation

To:	**Environment, Energy, and Resilience Committee**
Date:	**Thursday, 7 November 2024**
Author:	**S Allerby / Policy Planner**
Authoriser:	**D Bewley / GM Development & Environment Services**

1. Reason for the report - *Te Take mō tēnei rīpoata*

The purpose of this report is to seek approval from the Environment, Energy, and Resilience Committee to publicly notify proposed Plan Change 4 to the Whakatāne District Plan.

2. Recommendations - *Tohutohu akiaki*

1. THAT the *Proposed Plan Change 4 – Amendments to the Building Platform Level* report be **received**; and
2. THAT the Environment, Energy, and Resilience Committee **approve** the notification of proposed Plan Change 4, noting that the notification process will include a public notice being included in the mailout for the next rates instalment in February 2025.

3. Background - *He tirohanga whakamuri*

The Whakatāne District Plan (District Plan) manages flood risk to buildings through Rule NH-R33 which requires all building platforms, identified to be at risk of flooding (at the start of the building process), to raise the building platform to a level that is above the 1% Annual Exceedance Probability (AEP) design storm level (modelled flood level) plus include a level for freeboard. Freeboard is a standard modelling input that provides for modelling design imprecision, construction tolerances and natural phenomena. Raising the building platform level above the 1% AEP design storm level plus freeboard helps to provide a level of flood protection to the building and its inhabitants that is consistent with what is applied around New Zealand.

Flood risk to a building is identified at the start of the build process. When someone wants to build a new building, the Council requires that the proposed building site is checked against flood modelling held by either the Council or the Bay of Plenty Regional Council. If flooding is identified, then the building must comply with Rule NH-R33.

4. Issue/subject - *Kaupapa*

4.1. Need for Plan Change

Through its implementation, it has been identified that Rule NH-R33, as it is currently worded, is creating both inefficiencies and unintended consequences. The wording of Rule NH-R33 does not allow sufficient flexibility to reflect all building options, including piled foundations, that can be used to provide a building platform level above the 1% AEP design storm level plus freeboard.

Non-compliance with Rule NH-R33 is a discretionary activity. This activity status is unnecessary as it provides for a wide scope of assessment of a proposal when the only issue is flood risk. It also potentially adds costs and delays in being able to undertake building works.

It has also been identified that Rule NH-R33, which requires District Plan users to comply with Section 4.3.5.2 of the NZS4404:2010, introduces challenges due to ambiguous terms within Section 4.3.5.2. This ambiguity can lead to varied interpretations of Rule NH-R33, further complicating compliance with the rule.

Rule NH-R33 has also created unintentional consequences for additions to existing buildings and rooms which are not habitable making the process to get consent harder than it should be as they are discretionary activities. Under Rule NH-R33 the building platform level of an addition to an existing building and the building of any room which is not a habitable room cannot be lower than the 1% AEP design storm level plus freeboard. It is unreasonable to assess these activities as a discretionary activity because minor additions, and rooms that are not a habitable room can have minimal effect on the overall risk from the flood hazard.

4.2. Purpose of Plan Change 4

The purpose of proposed Plan Change 4 is to achieve the following:

- Change the wording of Rule NH-R33 to align with the key components of Section 4.3.5.2 of the NZS4404:2010 so its reference can be removed. This will enable the use of piled foundations to raise a building platform level above the 1% AEP design storm level plus freeboard;
- Introduce definitions to provide clarity to help interpret Rule NH-R33;
- Make it easier to allow minor additions to buildings which are below the 1% AEP design storm level plus freeboard;
- Make it easier to build rooms which are not a habitable room below the 1% AEP design storm level plus freeboard; and
- Provide certainty that alterations within the footprint of existing buildings will not be captured under Rule NH-R33.

Proposed Plan Change 4 also proposes a 1% AEP design storm level threshold of less than 300mm at any proposed new building site, a factor which Council currently has no control over. A 1% AEP design storm level of less than 300mm provides certainty that the activity will not be permitted if the flood risk to the safety of people is more than low. Defra and Agency [1] outline that flood depth below 300mm with a velocity of 0.3m/s or less, has a low degree of flood hazard. The Australian Institute for Disaster Resilience – Technical flood risk management guideline: Flood hazard: also outlines that flood depth below 300mm with a velocity less than 2m/s is generally safe for people, vehicles and buildings [2]. Any buildings proposed to be built on a site that has a 1% AEP design storm level of 300mm or greater will face a stricter set of restricted discretionary assessment criteria to help protect the building and keep its occupants safe. Additions to existing buildings will also only be permitted on a site that has a 1% AEP design storm level less than 300mm. If the 1% AEP design storm level is greater than 300mm, a set of restricted discretionary assessment criteria are required to be addressed.

5. Options analysis - *Ngā Kōwhiringa*

5.1. Option 1: Approve proposed Plan Change 4 for public notification

This option involves Council notifying proposed Plan Change 4 for public submission.

5.1.1. Advantage

Notifying proposed Plan Change 4 will allow Council to resolve the known issues associated with Rule NH-R33.

5.1.2. Disadvantages

- There are costs to Council for progressing the public plan change; and
- District Plan users will need to familiarise themselves with a new rule framework.

5.2. Option 2: Do not progress public plan change

Under this option, Council would not progress the public plan change.

5.2.1. Advantages

- There are no additional costs to Council through undertaking a plan change.
- There is no new rule framework that Whakatāne District Plan users will need to familiarise themselves with.

5.2.2. Disadvantage

Not undertaking the plan change means that difficulties will still be created for Council and District Plan users alike as there will still be issues associated with Rule NH-R33 as outlined in section 4.1.

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[1] Defra and Agency. (May 2008). *Supplementary Note on Flood Hazard Ratings and Thresholds for Development Planning and Control Purpose – Clarification of the Table 13.1 of FD2320/TR2 and Figure 3.2 of FD2321TR1*. Department for Environment, Food & Rural Affairs & Environment Agency. Note: Defra or the Department for Environment, Food and Rural Affairs is a ministerial department of the Government of the United Kingdom. It is responsible for environmental protection, food production and standards, agriculture, fisheries and rural communities in the entire United Kingdom.

[2] Australian Disaster Resilience Guideline 7-3: Technical flood risk management guideline: Flood hazard, 2014, Australian Institute for Disaster Resilience CC BY-NC

6. Significance and Engagement Assessment - *Aromatawai Pāhekoheko*

6.1. Assessment of Significance

The decisions and matters of this report are assessed to be of moderate significance, in accordance with the Council's Significance and Engagement Policy.

The following criteria are of particular relevance in determining the level of significance:

- **Level of community interest:** the overall level of community interest is expected to be low.
- **Financial impact:** the financial impact is considered to be low as costs associated with proposed Plan Change 4 will come out of existing budgets.
- **Consistency:** proposed Plan Change 4 is consistent with the District Plan creating a low level of significance for this matter.
- **Reversibility:** undertaking proposed Plan Change 4 is expected to result in changes that will be difficult to reverse which means the level of significance for this matter is high.
- **Impact on whānau/hapū/iwi:** possible impact for whānau/hapū/iwi is the proposed introduction of the less than 300mm 1% AEP design storm level threshold. The introduction of this threshold may affect the location that whānau/hapū/iwi can build in. The purpose of the threshold is to provide certainty that the activity will not be permitted if the flood risk to the safety of people is more than low. Buildings can still be built on sites with a 1 %AEP design storm level greater than 300mm, but a much stricter rule set will apply. The level of significance for this matter is considered to be medium.
- **Impact on strategic assets:** the expected impact on the performance or intended performance of the Council's Strategic Assets is low.

In terms of the significance of this decision, it is noted that the resulting action from approving the preferred option would be for proposed Plan Change 4 to be publicly notified to every ratepayer in the district, who would then be able to make a submission and present at a future hearing.

6.2. Engagement and community views

Consultation on the development of proposed Plan Change 4 has occurred according to the requirements of Schedule 1 to Resource Management Act 1991.

Consultation has occurred with:

1. Minister for the Environment
2. Bay of Plenty Regional Council
3. Iwi authorities of the District

The following comments were made by the Bay of Plenty Regional Council:

- to define the 1% AEP storm event level;
- that the freeboard requirement has changed for any room that is not a habitable room such as attached garages and additions, and that this differs from BOPRC's recommend level which would include all components of freeboard and that BOPRC have specified wording for freeboard; and
- confirmation that an addition under Rule NH-R33 would still need to meet the requirements of other rules in the District Plan.

Changes to the draft plan change were made to respond to these comments made by the Bay of Plenty Regional Council, and no comments were received from the Minister for the Environment.

The advice received from iwi authorities was that in general they were supportive of proposed Plan Change 4 and its intent.

The plan change will also be publicly notified to allow the opportunity for further input and changes.

7. Considerations - *Whai Whakairo*

7.1. Financial/budget considerations

The cost of proposed Plan Change 4 can be met through the existing policy planning budget.

7.2. Strategic alignment

Proposed Plan Change 4 is consistent with the District Plan and Council's Community Climate Change Strategy – "Our Climate Pathway". No inconsistencies with any of the Council's policies or plans have been identified in relation to this report.

7.3. Climate change assessment

The likely impacts of climate change have been considered throughout the development of proposed Plan Change 4. The plan change evaluation report, included as appendix to this report, also describes in detail how proposed Plan Change 4 is consistent with higher order legislation and the climate change requirements of this higher order legislation.

Proposed Plan Change 4 contributes to Council's Community Climate Change Strategy – "Our Climate Pathway" by ensuring future development in the Whakatāne District is climate resilient.

The plan change does not propose any changes to the way Council will reduce greenhouse-gas emissions (mitigation); however, the changes proposed create an adaptation response increasing resilience by ensuring buildings are resilient to flood risk which will be exacerbated by the effects of climate change.

Based on this climate change assessment, the decisions and matters of this report are assessed to have low climate change implications and considerations, in accordance with the Council's Climate Change Principles.

7.4. Risks

There may be objections from the community regarding the proposed 1% AEP design storm level threshold of less than 300mm. Currently, Council has no control over the 1% AEP design storm level that can be built in. The purpose of introducing this threshold is to ensure that flood risk to people and buildings is low. This aligns with the flood recurrence assessment interval in the Bay of Plenty Regional Policy Statement. People can exceed this threshold but will face a much stricter set of rules to protect the building and to keep its occupants safe.

Proposed Plan Change 4 will be publicly notified so the community will be able to submit and provide input into the plan change.

8. Next steps - *Ahu whakamua*

Should the recommended option be approved by the Committee, Council staff will complete the administrative tasks to have proposed Plan Change 4 ready to be notified and sent out with the next instalment of Council rates.

Attached to this report:

- Appendix 1 - Proposed Plan Change 4 – Amendments to the Building Platform Level for Flood Risk Management and Mitigation – Section 32 Evaluation Report

7.5.1 Appendix 1 - Proposed Plan Change 4 – Amendments to the Building Platform Level for Flood Risk Management and Mitigation – Section 32 Evaluation Report

Proposed Plan Change 4 to the Whakatāne District Plan

Amendments to the Building Platform Level for Flood Risk Management and Mitigation

Section 32 Evaluation Report

A2773830

7.5.1 Appendix 1 - Proposed Plan Change 4 – Amendments to the Building Platform Level for Flood Risk Management and Mitigation – Section 32 Evaluation Report(Cont.)

Section 32 Report Version control

Version	Date	Updated by	Reviewed by	Details
14.0		Stephen Allerby	Nicholas Woodley	Final

Department	Policy Planning
Project sponsor	David Bewley and Nicholas Woodley
Author	Stephen Allerby

7.5.1 Appendix 1 - Proposed Plan Change 4 – Amendments to the Building Platform Level for Flood Risk Management and Mitigation – Section 32 Evaluation Report(Cont.)

Contents

7.5.1 Appendix 1 - Proposed Plan Change 4 – Amendments to the Building Platform Level for Flood Risk Management and Mitigation – Section 32 Evaluation Report(Cont.)

Appendices

Summary

The Whakatāne District Plan (District Plan) currently manages flood risk through Rule NH-R33, which requires building platforms to have freeboard above the level of a 1% AEP (Annual Exceedance Probability) design storm level. However, the rule has proven to be inefficient, particularly for redevelopment and infill projects in flood-prone urban areas. The rule mandates excavated/raised building platforms, which can cause water displacement, negatively impacting design and local amenities. Additionally, the rule also applies to building additions, including non-habitable rooms such as attached garages. Application of the rule in its current state can create impractical or undesirable results. Also, the need for full discretionary consent for alternative solutions is unnecessarily burdensome. Inefficiency is also caused by the rule referencing Section 4.3.5.2 of the NZS4404:2010 requiring District Plan users to comply with two different rules. As the Rule is not an exact match to the Standard, this creates unnecessary ambiguity for applicants.

To address these issues, the Whakatāne District Council (Council) is proposing Plan Change 4 (PC4) to the District Plan to make several amendments to Rule NH-R33. These amendments include aligning Rule NH-R33 with the intent and key components of Section 4.3.5.2 of the NZS4404:2010 to create a rule that is self-contained thereby eliminating the need to reference the Standard. Aligning Rule NH-R33 with the intent of Section 4.3.5.2 of the NZS4404:2010 allows for more flexible foundation solutions that reduce flood risk. PC4 also proposes to allow resilient rooms which are attached and not a habitable room in flood-prone areas, and allow minor additions or alterations to existing buildings in low flood risk areas. A restricted discretionary consent pathway with specific criteria for managing flood risk is also proposed for projects that do not meet the new standards proposed by PC4.

The changes proposed by PC4 aim to make the District Plan's flood management framework more effective and user-friendly while maintaining necessary safety and flood risk mitigation standards.

1 Overview

1.1 Purpose

This report has been prepared to fulfil the statutory obligations of the Council in preparing an evaluation report under section 32 of the Resource Management Act 1991 (RMA) for a proposed plan change to the operative District Plan.

Under section 32 of the RMA, the Council is required to carry out an evaluation to examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA.

The evaluation must have regard to the efficiency and effectiveness of policies, rules and other methods in considering whether they are the most appropriate means of achieving the objective.

The evaluation must consider the benefits and costs associated with each policy, rule or method and the risk of acting or not acting if there is uncertain or insufficient information on the subject matter of the provisions.

This report should be read together with the District Plan.

1.2 Background / Need for Plan Change

1.2.1 Rule NH-R33

Rule NH-R33 manages the reduction of flood risk to a low level by requiring that all building platforms (other than those for detached and non-habitable accessory buildings) have freeboard above the level of the 1% AEP design storm level:

> *"All building platforms, other than those for detached and non-habitable accessory buildings, must account for flooding and include stormwater system designed in accordance with NZS4404:2010 Land Development and Subdivision Infrastructure, Section 4.3.5.2 or subsequent revision, provided that the minimum free board shall be measured to the building platform level, not the underside of the floor joists or underside of the floor slab."*

7.5.1 Appendix 1 - Proposed Plan Change 4 – Amendments to the Building Platform Level for Flood Risk Management and Mitigation – Section 32 Evaluation Report(Cont.)

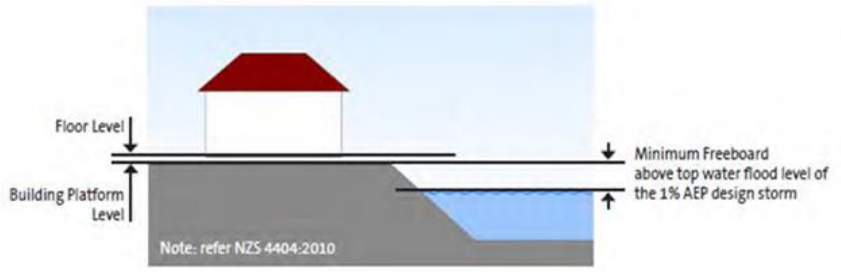

Figure 1 - NH-R33 Figure 56 Freeboard illustration (Whakatāne District Plan 2017)

Compliance with Rule NH-R33 is achieved by ensuring the minimum building platform level has a specified measurement of freeboard above the modelled 1% AEP design storm level.

Rule NH-R33 is inconsistent with Section 4.3.5.2 of the NZS4404:2010, which the rule references and states must be adhered to.

Rule NH-R33 states that the minimum freeboard:

> *"…shall be measured to the building platform level, not the underside of the floor joists or underside of the floor slab."*

Section 4.3.5.2 of the NZS4404:2010 states that the minimum freeboard:

> *"…shall be measured from the top water level to the building platform level or the underside of the floor joists or underside of the floor slab, whichever is applicable."*

This departure from NZS4404 was intentional, with the focus on enabling excavated/raised building platforms as the preferred development outcome.

Excavated/raised building platforms that are free of flooding can be efficiently created during the earthworks phase of greenfield or comprehensive development. However, in infill areas, site filling to create excavated/raised building platforms is often not feasible nor desirable due to space constraints, amenity effects, and the displacement or diversion of flood water onto other properties.

The rule as it stands requires that a resource consent for a discretionary activity is required to allow the use of piled foundations to raise a building platform level that is lower than the 1% AEP design storm level to a specified height that is above the 1% AEP design storm level plus any freeboard amount required. This is because the rule as written does not recognise the validity of using a pile foundation for flood protection.

The discretionary activity status is unreasonable as it provides a wide scope of assessment of a proposal when the only issue is flood risk. It also potentially adds unnecessary costs and delays in being able to undertake the building work.

The use of piled foundations to raise the building platform level above the 1% AEP design storm level plus freeboard is generally accepted as a desirable low risk construction method within an existing built environment and should be recognised accordingly by Rule NH-R33.

1.2.2 1% AEP design storm level

Rule NH-R33 and the associated diagram refer to freeboard above the "*top water flood level of a 1% AEP design storm*". The estimation of flood level requires the adoption of a range of factors and assumptions for modelling. This includes assumptions about climate change.

Given the flood map information sits outside the District Plan it is appropriate, for reasons of transparency, certainty and consistency, that the factors and assumptions for determining the 1% AEP design storm level be defined in the District Plan.

1.2.3 Rooms which are not a Habitable Room and Additions to Existing Buildings

In applying Rule NH-R33, there are circumstances where proposed building works to create rooms which are not habitable such as attached garages, and additions to existing buildings can result in undesirable or impractical outcomes including:

- The building platform level of any room cannot be lower than the floor level of the rest of the building even where the room is not habitable and constructed of materials that are resilient to flood damage; and
- The building platform level of a minor addition or alteration to an existing building may need to be higher than the existing building platform level, and in many cases, higher than the floor level of the existing building.

Both non-habitable additions and minor habitable additions and alterations to existing buildings have minimal effect on the overall level of risk from a flooding hazard. This is a particularly disproportionate issue when the scale of additions to existing buildings is small.

Non-compliance with Rule NH-R33 is a discretionary activity. The discretionary assessment of these activities is unreasonable because there is less certainty in the gaining of resource consent for the applicant as well as the burden of costs and delays in being able to undertake the building work. It is more efficient to focus the assessment for the resource consent application simply to those effects that the rule is seeking to address.

1.2.4 Rule NH-R33 referencing Section 4.3.5.2 of the NZS4404:2010

Rule NH-R33, which requires District Plan users to comply with Section 4.3.5.2 of the NZS4404:2010, introduces challenges due to ambiguous terms within that section. This ambiguity can lead to varied interpretations of Rule NH-R33, further complicating the assessment of compliance with the rule.

Additionally, Rule NH-R33 referring to Section 4.3.5.2 of the NZS4404:2010 creates a circumstance where the standard could be updated leaving the rule to make an incorrect reference, a situation that would create more ambiguity for District Plan users.

1.3 Scope of Plan Change

The scope of PC4 is to provide flood risk management and mitigation by:

- amending Rule NH-R33 to align with the key components of Section 4.3.5.2 of the NZS4404:2010 so reference to the Standard can be removed;
- adding a new definition for “1% AEP design storm level”;
- adding a new definition for “building platform level”;
- adding a new definition for “freeboard”;
- adding a new permitted activity rule that provides for any room, which is not a habitable room such as attached garages, with building platform levels below the 1% AEP design storm level plus freeboard; and
- adding a new permitted activity rule that provides for minor additions to existing buildings with building platform levels below the 1% AEP design storm plus freeboard.

2 Resource Management Act Policy Direction

2.1 Purpose and Principles

In carrying out a section 32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA. Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while –

- sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
- avoiding, remedying, or mitigating any adverse effects of activities on the environment.

PC4 will manage the damage to life and property by improving the effectiveness and efficiency of rules that provide flood risk management for the purpose of protecting the health and safety, economic and social well-being of people and communities.

In achieving the purpose, decision-makers also need to recognise and provide for the matters of national importance identified in section 6, have particular regard to other matters referred to in section 7 and take into account the principles of the Treaty of Waitangi under section 8.

2.2 Section 6 – Matters of national importance

Section 6 outlines the matters of national importance including section 6(h) which requires Council to recognise and provide for the management of significant risks from natural hazards. This matter is directly relevant to the assessment of PC4.

Flooding is defined as a natural hazard under the RMA. The purpose of PC4 is to help Council more appropriately manage the significant risk from flood hazards.

2.3 Section 7 - Other matters

Section 7(i) of the RMA requires persons exercising functions and powers under the RMA to have particular regard to the effects of climate change. The effects of climate change are directly relevant to PC4.

Climate change rainfall projections for the Bay of Plenty region under Representative Concentration Pathways (RCPs) 4.5 and 8.5 estimate under both scenarios that by 2040, annual rainfall is not expected to change significantly overall, but the seasonality of rainfall is expected to change with spring and summer generally becoming drier and winter and autumn becoming wetter than the historic period. By 2090, annual rainfall totals are projected to decline under both scenarios. Similar to 2040, summer and spring rainfall is projected to decline, and winter and autumn rainfall is projected to increase[1].

Flood level modelling takes into account the effects of climate change on rainfall and sea level over at least a 100-year timeframe.

2.4 Section 8 – Treaty of Waitangi

All persons exercising functions and powers under the RMA must take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

These principles are often referred to as partnership, protection and participation.

In this regard, consultation with iwi authorities has occurred in the development of this plan change as set out in section 4.3 of this report.

2.5 Section 30 – Functions of Regional Councils under the RMA

Section 30(1)(c)(iv) requires regional councils to control the use of land for the purpose of, “the avoidance or mitigation of natural hazards”.

This is reflected in the Regional Policy Statement (RPS) Natural Hazards policies which sets out a comprehensive management framework for natural hazards designed to promote a risk based approach to both new and existing development.

PC4 gives effect to the RPS Natural Hazard policies.

Under Policy NH 13C: Allocation of responsibility for natural hazard identification and risk assessment:

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[1] National Institute of Water and Atmospheric Research Ltd (2019). *Climate change projections and impacts for the Bay of Plenty Region.* Client report 2019218AK for Bay of Plenty Regional Council.

- The Bay of Plenty Regional Council is responsible for susceptibility mapping for coastal inundation; and flooding from natural water courses outside urban areas with reticulated stormwater networks; and
- The Whakatāne District Council is responsible for susceptibility mapping for flooding from natural water courses inside urban areas with reticulated stormwater networks.

PC4 applies a risk-based approach to flood management. Application of PC4 to resource and building consent processes involves referencing flood modelling outputs from both the Council and the Bay of Plenty Regional Council. The flood modelling outputs identify geographic areas that are exposed or potentially exposed to risk from flooding over the next 100 years.

2.6 Section 31 - Functions of Territorial Authorities under the RMA

Section 31(1)(b)(i) sets out that the control of any actual or potential effects of the use, development, or protection of land, for the avoidance or mitigation of natural hazards is a function of territorial authorities under the RMA.

The purpose of PC4 is to directly assist Council in carrying out its function under section 31 of the RMA, to manage and mitigate the risk of flood hazards.

2.7 Section 74 – Matters to be Considered by Territorial Authority

Section 74(1)(a) sets out that territorial authorities must prepare and change their district plan in accordance with their functions under section 31 of the RMA.

The purpose of PC4 is to directly assist Council in carrying out its function under section 31 of the RMA, to manage and mitigate the risk of flood hazards.

2.8 National Policy Statements

Under s75(3)(a) of the RMA, a District Plan must give effect to any National Policy Statement. National Policy Statements provide national direction for matters of national significance relevant to sustainable management.

2.8.1 National Policy Statement on Urban Development 2020 (NPS-UD)

The NPS-UD aims to ensure that New Zealand's towns and cities are well-functioning urban environments that meet the changing and diverse needs of communities. This is the key NPS that is relevant to PC4.

The principal objective of the NPS-UD is:

Objective 1: *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

Objective 8, of the NPS-UD, seeks that *urban environments;*

a) support reductions in greenhouse gas emissions; and
b) are resilient to the current and future effects of climate change.

Objective 8 is supported by Policy 1 and Policy 6, which require that urban environments support the reduction of greenhouse gases and are resilient to the adverse effects of climate change.

PC4 gives effect to the NPS-UD by providing a more efficient and effective regulatory framework for managing the risk from flood hazards, taking into account climate change projections.

2.8.2 Other National Policy Statements

The other National Policy Statements that are currently in force but not relevant to the consideration of PC4 are:

- The National Policy Statement for Freshwater Management 2020 sets a national framework for how freshwater is to be managed across the country and Te Mana o te Wai is its "fundamental concept". Te Mana o te Wai is about respecting and looking after the water, so the water can look after you.
- The National Policy Statement for Renewable Energy Generation 2011 recognises the importance of renewable energy and applies to renewable energy generation activities at any scale. It covers the construction, operation and maintenance of structures associated with renewable electricity generation.
- The National Policy Statement for Electricity Transmission 2008 provides a high-level framework that gives guidance across New Zealand for the management and future planning of the national grid.
- The National Policy Statement for Highly Productive Land 2022 recognises the importance of the availability of highly productive land for food and fibre production by requiring highly productive land to be identified and managed to prevent its inappropriate subdivision, use and development.
- The National Policy Statement for Indigenous Biodiversity (NPS-IB) is an essential part of the response to biodiversity decline in New Zealand. The NPS-IB provides direction to regional and district authorities to protect, maintain and restore indigenous biodiversity requiring at least no further reduction nationally.
- The purpose of the National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023 is to reduce emissions of greenhouse gases by managing the discharges to air of greenhouse gases from the production of industrial process heat, in order to mitigate climate change and its current and future adverse effects on the environment and the wellbeing of people and communities.

2.9 New Zealand Coastal Policy Statement 2010 (NZCPS)

Section 75(3)(b) of the RMA requires that a district plan gives effect to the NZCPS. The NZCPS guides regional and territorial authorities in their day-to-day management of the coastal environment.

Rule NH-R33 provides for freeboard for dwellings that are identified to be at risk from coastal flooding.

Coastal processes also impact on the hydrological cycles of rivers and streams further inland which can lead to increased flooding from rainfall events. This impact is addressed in flood modelling that will be used in the application of PC4 to assess development proposals.

Policy 25 of the NZCPS is the core policy on coastal hazards:

Policy 25: Subdivision, use, and development in areas of coastal hazard risk

> *In areas potentially affected by coastal hazards over at least the next 100 years:*
>
> *a. avoid increasing the risk of social, environmental and economic harm from coastal hazards;*
> *b. avoid redevelopment, or change in land use, that would increase the risk of adverse effects from coastal hazards;*
> *c. encourage redevelopment, or change in land use, where that would reduce the risk of adverse effects from coastal hazards, including managed retreat by relocation or removal of existing structures or their abandonment in extreme circumstances, and designing for relocatability or recoverability from hazard events;*
> *d. encourage the location of infrastructure away from areas of hazard risk where practicable;*
> *e. discourage hard protection structures and promote the use of alternatives to them, including natural defences; and*
> *f. consider the potential effects of tsunami and how to avoid or mitigate them.*

PC4 gives effect to Policy 25 of the NZCPS by requiring dwellings identified to be at risk from coastal flooding to raise the building platform level above the flood level, and by using a planning horizon of at least the next 100 years.

2.10 National Adaptation Plan (NAP)

The NAP is the Government's first step towards meeting the long-term vision and goals for a climate-resilient New Zealand. Section 74(2)(e) of the RMA requires that Council shall have regard to the NAP when it is preparing or changing the District Plan.

> *NAP Objective HBP1: Homes and buildings are climate resilient, and meet social and cultural needs.*

PC4 is consistent with Objective HBP1 as the changes sought by PC4 will enable the improvement of building stock and improve the ability of buildings to withstand inundation whilst allowing people to meet their social and cultural needs.

The NAP also recommends that when changing plans under the RMA, including giving effect to the provisions of the NZCPS, the Council should use recommended climate change scenarios.

In the development of PC4 regard has been given to the NAP as it gives effect to the provisions of the NZCPS and the modelling that informs the 1% AEP design storm level uses climate change scenarios recommended by current national guidance.

2.11 Emissions Reduction Plan (ERP)

The ERP sets out how New Zealand will reduce greenhouse gas emissions and slow the impacts of climate change. The ERP is based on five principles that set out how New Zealand can make a managed transition to a low-emission economy. Section 74(2)(d) of the RMA requires that Council shall have regard to the ERP in its plan making process.

Council can support the principles of the ERP by developing RMA-related plans that consider climate issues and the role that RMA plans have in reducing greenhouse-gas emissions. Council can also support the ERP principles by integrating RMA-related plans with non-RMA strategies.

"Our Climate Pathway" is a non-RMA strategy that sets the pathway for how Council and the community can work together to shape sustainable, low-emission, and climate resilient communities.

PC4 does not propose any changes to the way Council will reduce greenhouse-gas emissions; however, the changes proposed by PC4 will help address climate change adaptation issues and achieve an objective of Council's community climate strategy – "Our Climate Pathway" by ensuring future development in the District is climate resilient.

Regard has been given to the ERP in the development of PC4.

2.12 The Bay of Plenty Regional Policy Statement (RPS)

Section 75(3)(c) of the RMA requires the District Plan to give effect to the RPS. The RPS promotes the sustainable management of the Bay of Plenty Region's natural and physical resources and identifies the resource management issues facing the region.

Of particular relevance, changes made to the RPS by Change 2 (Natural Hazards), which became operative in July 2016, guide regional, city and district plans in managing land use and associated activities according to their level of natural hazard risk.

An analysis of the RPS and how it applies to PC4 is included in Appendix 2.

In summary, the proposed changes give greater effect to the RPS natural hazard policies through:

- Applying a risk-based approach[2] to flood risk management;
- The proposed rules will ensure that new development and redevelopment will be protected from flooding risk to an appropriate level; and
- The proposed rules will ensure that redevelopment will not increase the overall level of flood risk.

[2] A risk based approach means land use planning interventions that consider, in a spatial sense, the likelihood of a natural hazard occurring and what the consequences would be in the affected area.

2.13 Regional Plans

Under section 75(4) of the RMA the District Plan must not be inconsistent with a regional plan for any matter specified in section 30(1).

2.13.1 The Bay of Plenty Regional Natural Resources Plan (RNRP)

The purpose of the RNRP is to promote the sustainable and integrated management of land and water resources within the Bay of Plenty. To achieve this, the RNRP has policies and methods (which include rules) to address issues of use, development and protection of land resources, geothermal resources and freshwater resources, including the beds and margins of water bodies.

Natural hazard Objective 49 seeks that the effects of flood hazards on the region's people, communities and natural and physical resources are avoided or mitigated.

The purpose of PC4 is to help Council appropriately manage the significant risk from flood hazards.

PC4 is not inconsistent with the RNRP.

2.13.2 The Bay of Plenty Regional Coastal Environment Plan (RCEP)

The RCEP promotes sustainable management of the natural and physical resources of the coastal environment incorporating values and issues for the coastal marine areas such as natural coastal hazards.

Objective 20 states that Coastal communities are aware of risks from natural hazards, and mitigation actions are in place to enhance the resilience of existing and future communities.

Policy CH 5 supports the RPS and NZCPS requirements of planning for at least 100 years.

The provisions proposed in PC4 will help the Council manage and mitigate the risk from coastal flooding and are not inconsistent with the RCEP objectives and policies.

2.14 Whakatāne District Plan 2017

The objectives and policies of the District Plan that are particularly relevant to PC4 are:

Strategic Objective SD-O1

Growth is encouraged in a carefully planned, sustainable way while minimising the impact on the environment, including existing communities; retaining the characteristics and values of the District; and managing risk by avoiding or mitigating natural hazards.

Strategic Objective SD-O5

A high level of community connectivity, resilience, health and safety.

Strategic Policy SD-P25: To avoid or mitigate the adverse effects of natural hazards on people, communities and infrastructure by managing the subdivision, use, development and protection of land.

Natural Hazards Objective NH-O1

Manage the subdivision, use, development and protection of land so as to avoid or mitigate the adverse effects of natural hazards on the life and wellbeing of people, and significant environmental values.

Policy NH-P3: To avoid or mitigate the adverse effects of the subdivision, use or development of land which is, or is likely to be, subject to material damage by erosion, falling debris, subsidence, slippage or inundation from any source.

Policy NH-P4: To avoid or mitigate the adverse effects of the subdivision, use or development of land that is likely to accelerate, worsen or result in material damage to that land, or other land, or structures, by erosion, falling debris, subsidence, slippage or inundation from any source.

Policy NH-P11: To manage the avoidance or mitigation of natural hazards according to their level of risk.

Objective NH-O2

To protect natural and physical resources and provide for the economic wellbeing and safety of people and communities by:

b. avoiding or mitigating the effects of coastal flooding on the use, subdivision and development of land in the Coastal Hazard Flood Policy Area (CHFPA); and

c. avoiding, remedying or mitigating the effects of land use, subdivision and development on the coastal environment.

Policy NH-P15: To ensure dwellings and habitable buildings located in the CHFPA are erected at or above the minimum building floor level identified for the site.

The objectives and policies of the District Plan are appropriate, and the outcomes sought are supported by PC4.

3 Other Relevant Legislation

3.1 Local Government Act 2002 (LGA)

The purpose of local government under s10(1)(b) of the LGA is "*to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future*".

PC4 has been prepared to mitigate the damage to life and mitigate or minimise damage to property by managing land use and development on land susceptible to flooding, thus protecting the economic and social well-being of communities. Through clarifying the rules for additions to existing buildings, PC4 better provides for the social and economic wellbeing of the community.

3.2 Civil Defence Emergency Act 2002

The purpose of the Civil Defence Emergency Management Act 2002 (CDEM Act) is to improve and promote the sustainable management of hazards in a way that contributes to the social, economic, cultural and environmental well-being and safety of the public and the protection of property.

The CDEM Act requires every regional council and every territorial authority within that region to unite to establish a Civil Defence Emergency Management Group (CDEM Group) and establish a Group Plan.

The CDEM Group Plan then sets objectives under each of the 4 Rs:

- planning and implementing risk *reduction*;
- maintaining a state of *readiness* (having the capacity and planning in place should an event occur);
- *response* at the time of a civil defence emergency; and
- overseeing *recovery* operations once an event has occurred.

Land use risk reduction policies within a CDEM Group Plan should be linked to a Regional Policy Statement, then down to regional and district plans.

Local authorities' RMA functions of avoiding or mitigating natural hazards contribute to the first of those "Rs" - risk reduction. The CDEM Group Plan outlines that reduction "*involves identifying and analysing risks to life and property from hazards: taking steps to eliminate these risks if practicable, and, if not reducing the magnitude of their impact and the likelihood of their occurrence to an acceptable level*."

The purpose of PC4 is to clarify the intent of Rule NH-R33 which provides the framework that allows Council to reduce the risk from flood hazards.

PC4 is consistent with the CDEM and the Bay of Plenty CDEM Group Plan.

3.3 Building Act 2004

The Building Act defines natural hazards as erosion, falling debris, subsidence, inundation (including flooding, overland flow, storm surge, tidal effects and ponding) and slippage.

As a building consent authority under the Building Act, Council must refuse to grant building consent if land is subject, to a natural hazard or if the building will accelerate, worsen or result in a natural hazard on the land or any other property.

However, Council may grant a building consent on land subject to, or potentially subject to, a natural hazard where it considers the building work will not accelerate, worsen or result in a natural hazard on the land or any other property, and it is reasonable for Council to grant a waiver from one or more provisions of the New Zealand Building Code.

The Building Code requires that all new dwellings, communal residential and communal non-residential buildings should, as per Clause E1.3.2, ensure that, "*surface water, resulting from an event having a 2% probability of occurring annually, shall not enter buildings*".

District Plan Rule NH-R33 applies a more stringent flood hazard control than that required by the Building Code by ensuring that surface water from a 1% AEP flood event does not enter buildings. This higher standard gives effect to the flood risk management criteria in the RPS.

4 Consultation

Under clause 3(1) of Schedule 1 to the RMA, local authorities are required to consult the Minister for the Environment, local authorities who may be affected by the plan, and the tangata whenua of the area who may be so affected, through iwi authorities.

4.1 Minister for the Environment

The Minister for the Environment has been advised of PC4 and feedback has been sought. No issues or concerns related to PC4 have been raised.

4.2 Bay of Plenty Regional Council

Consultation has occurred with policy staff of BOPRC to discuss matters relating to RPS compliance and matters relating to the proposed plan change. BOPRC staff have also been included in the section 32 report development, providing comments on the draft plan change documentation.

Comments received from BOPRC staff include:

- that there was no requirement for PC4 to undertake a full RPS risk assessment
- to define the 1% AEP storm event level;
- to describe how updated flood modelling would be taken into account;
- that the freeboard requirement has changed for any room that is not a habitable room such as attached garages and additions, and that this differs from BOPRC's recommend level which would include all components of freeboard; and
- that BOPRC have specified wording for freeboard, and confirmation that an addition under Rule NH-R33 would still need to meet the site permeability requirements of the General and Medium Density Residential Zones.

4.3 Advice from Iwi Authorities

Under clause 4A of Schedule 1 to the RMA local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan

Section 32(4A) requires evaluation reports prepared in relation to proposed policy statements and / or plans to include summaries of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The following is a summary of the advice received from iwi authorities specific to the draft / proposed provisions evaluated within this report:

4.3.1 Te Rūnanga o Ngāti Manawa

Te Rūnanga o Ngāti Manawa (TRONM) feedback asked if the plan change will also provide flood maps and whether the District Plan will include rules about areas where housing can be built.

The Council responded to TRONM saying that flood maps were not part of PC4 which only has a narrow scope of amending an existing rule in the District Plan.

TRONM is supportive of PC4 moving forward as the Rūnanga recognises that protecting people and property from flood risk is important in a changing climate.

4.3.2 Te Rūnanga o Ngāti Whare

Te Rūnanga o Ngāti Whare has expressed no concerns and is supportive of PC4 moving forward.

4.3.3 Te Uru Taumatua

Te Uru Taumatua has expressed no concerns and is supportive of PC4 moving forward.

4.3.4 Te Manawa o Ngāti Rangitihi

Te Manawa o Ngāti Rangitihi has expressed no concerns and is supportive of PC4 moving forward.

4.3.5 Tūwharetoa mai Kawerau ki te Tai

The Council has attempted to engage with Tūwharetoa mai Kawerau ki te Tai and has provided the draft plan change information with no feedback being received.

4.3.6 Te Rūnanga o Ngāti Awa

Te Rūnanga o Ngāti Awa are supportive of the provisions proposed by PC4 and its intent.

4.3.7 Ngāti Mākino Iwi Authority

The Ngāti Mākino Iwi Authority has expressed no concerns and is supportive of PC4 moving forward.

5 Resource Management Issues Analysis

This section identifies the resource management issues that PC4 will address.

5.1 Rule NH-R33 - Minimum Building Platform Level

Council has identified that Rule NH-R33 is generally fit for purpose in greenfield or comprehensive development areas, but that it creates undesirable outcomes in existing urban areas (infill and redevelopment). The rule as it stands means that resource consent for a discretionary activity is required to use piled foundations to raise a building platform level that is below the 1% AEP design storm level to a specified height above the 1% AEP design level plus any freeboard required.

A definition of the 1% AEP design storm level is also needed to provide transparency, certainty and consistency in District Plan implementation.

5.2 Rooms which are not a Habitable Room and Additions to Existing Buildings

Under Rule NH-R33 the building platform level of any room, which is not a habitable room cannot be lower than the building platform level of the rest of the building. Rule NH-R33 can also require the building platform level of an addition to a building to be higher than the floor level of the existing building.

The outcome Rule NH-R33 currently provides is often impractical for rooms which are not a habitable room and additions to existing buildings where the building platform level is below the 1% AEP design storm level plus freeboard. Rooms that are not habitable and minor additions have minimal effect on the overall risk from the flooding hazard for an existing building or neighbouring properties.

This is a disproportionate issue when the scale of additions to existing buildings is minor and the additions have a minimal effect on overall risk from the flood hazard. However, non-compliance with Rule NH-R33 is a discretionary activity. As a discretionary activity, there is no restriction on the Council's discretion on what matters need to be considered. Applicants for discretionary resource consents therefore must lodge comprehensive applications for very minor alterations and additions. The limited scope of minor alterations does not warrant the comprehensive content required to satisfy a discretionary activity resource consent status.

5.3 Effectiveness and Efficiency of the District Plan Provisions

5.3.1 Objectives and Policies

The District Plan contains objectives, policies and rules relating to the management of natural hazards, including the inundation hazard.

Objective NH-O1 of the District Plan is to manage subdivision, use, development and protection of land to avoid or mitigate the adverse effects of natural hazards on the life and wellbeing of people, and significant environmental values.

The purpose of Rule NH-R33 is to manage and mitigate the adverse effects of the inundation hazard whilst also providing for the wellbeing of people.

Under the District Plan, all building platforms identified to be at risk from a 1% AEP design storm must comply with Rule NH-R33. The effectiveness of this rule has been compromised in that it requires a site to be filled to create a safe building platform. The rule is often not a practicable flood management method in existing areas of redevelopment or infill because earthworks needed to raise the level of a site may cause the displacement of floodwater, creating a higher flood level, causing adjacent sites to receive more floodwater as a consequence.

Strict adherence to Rule NH-R33 also creates undesirable and impractical outcomes for rooms that are not habitable and minor additions and alterations to existing buildings that have minimal effect on the overall risk from the flood hazard.

6 Scale and Significance

Under section 32(1)(c) of the RMA, this evaluation report needs to:

"*contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal".*

The following scale and significance assessment discusses PC4 in terms of eight factors, and scores each high, medium or low. The ranking indicates where on the continuum of scale and significance the proposal falls. The assessment concludes with a summary and gives a final overall score for the scale and significance of PC4.

Criteria	Matters for consideration	Comments	Score
Reasons for the change	• Initiated locally plan effectiveness monitoring, community reaction to resource use etc	The reasons for the change are: There are terms in Rule NH-R33 that create undesirable outcomes for Council and District Plan users alike. Issues can be resolved through resource consents, but this is unduly onerous. Rule NH-R33 also creates circumstances where rooms that are not habitable and additions to existing buildings can result in unintended or impractical outcomes. Issues can be resolved through discretionary resource consents, but this is unduly onerous.	Low
Degree of shift from the current approach	• Addressing existing or new resource management issue • Proposing a new management regime/minor or major change in rule framework • Extent and scale of regulatory impact • Discrete provisions, or broader suite of existing provisions	One of the key themes of the District Plan is to create safe and resilient communities by providing for the ongoing management of natural hazards such as flooding. The Whakatāne District has experienced multiple, major flood events over the last 20 years and with climate change increasing the frequency and intensity of rainfall during autumn and winter which will increase the risk of flooding, it is important that the rule framework for flooding is coherent and able to achieve safe and resilient communities. PC4 is proposing a change in the rule framework for flooding that will provide clarity and improve outcomes for Council and District Plan users alike.	Low
Who and how many will be affected?	• Degree of public interest and engagement in issue • Degree to which proposal will address identified community outcomes • How many will be affected? Single landowner/multiple landowners/occupiers/neighbourhoods/businesses/cities/future generations • Degree of impact on private property	Rule NH-R33 applies to all building platform levels across the Whakatāne District (either existing or new), that are affected by the 1% AEP design storm level. The rules already apply to a large proportion of the Whakatāne District.	Medium

Degree of impact on, or interest from iwi/Māori	• Level of interest from iwi/Māori engagement with iwi on the issue • Likely degree of impact on iwi/hapū? • Impact on sites, areas or resources of significance to iwi/Māori • Degree of consistency with iwi management plans	Ngāti Awa Environment Plan Policy 7.1.4 – Require a precautionary approach is taken to enabling development along coastal areas and floodplains, particularly in relation to sea level rise and flood risk. The modelling that is used in the application of the flood hazard rules incorporates factors that reflect an appropriately cautious approach.	Low
When will effects occur?	• Temporarily (weeks or months) • For the next 1-5 years • Ongoing into the future	PC4 seeks to improve the current rule framework for flooding that will apply over the lifespan of the District Plan.	Low
Geographic scale of impacts	• Very localised or wide ranging (ie, single site/whole zones/one or more regions/single or multiple natural resources)	PC4 is a District wide plan change.	High
Type of effect	• Acute/chronic/temporary/cumulative/positive/negative/irreversible • Likelihood and consequence (eg, low probability, high consequence) • Part(s) of environment affected (ecosystems, infrastructure, amenity) • Degree of impact on social, cultural or economic well-being • Degree of impact (positive/negative) on Part 2 matters	PC4 will have an ongoing positive effect by managing and reducing the level of risk from flood hazards. PC4 will have a positive impact on RMA Part 2 matters as the plan change seeks to improve the management of flood risk. The changes proposed by PC4 will provide for the social, economic well-being and health and safety of people and communities over the long term.	Low
Degree of policy risk, implementation risk, or uncertainty	• Community reaction • Whether: ▪ novel, untested approach ▪ weak evidence base ▪ highly uncertain benefits and costs ▪ dependent on other initiatives (such as non-RMA mechanisms) ▪ challenging implementation timeframes	The approach to be applied has been implemented since the District Plan was made Operative in 2017 and the purpose of PC4 is to improve that approach. Control measures are conventional and follow contemporary practice elsewhere.	Low

Summary
The effects of climate change are resulting in a higher frequency and intensity of rainfall, increasing the risk of flooding across the Whakatāne District. The consequential increase in flood risk means it is important that the District Plan provides a robust and coherent rule framework for flood management which is the purpose of PC4. PC4 will have positive effects for Council and Plan users alike by providing for the social, economic well-being and health and safety of people and communities over the long term.
The above assessment concludes that the overall scale and significance of PC4 is Low. In accordance with s32(1)(c) of the RMA, this evaluation report is required to contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

7 Evaluation of Objective

Section 32(1)(a) requires that an evaluation report must examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA.

Objective NH-O1 of the Operative District Plan is:

> *"Manage the subdivision, use, development and protection of land so as to avoid or mitigate the adverse effects of natural hazards on the life and wellbeing of people, and significant environmental values."*

Objective NH-01 is consistent with, and assessed as the most appropriate way to achieve, the purpose of the RMA which is to promote the sustainable management of natural and physical resources.

The meaning of sustainable management includes:

> *"managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety …"*

No changes are proposed to Objective NH-O1 of the District Plan and the evaluation of provisions will be undertaken against Objective NH-O1 of the District Plan.

The PC4 evaluation of provisions will be undertaken as options that summarise the analysis of a wider package of provisions.

8 Evaluation of Provisions (Options)

Section 32(1)(b) requires that an evaluation report must:

> *"…examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by-*
>
> *i. identifying other reasonably practicable options for achieving the objectives; and*
> *ii. assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
> *iii. summarising the reasons for deciding on the provisions; and …"*

8.1 Options to Achieve Objective

8.1.1 Description of Options

Section 32(1)(b)(i) requires that an evaluation report must identify reasonably practicable options for achieving the objective. Three options were considered for achieving Objective NH-O1 of the District Plan.

The reasonably practicable options identified for evaluation are:

- Status quo

- Enabling
- Restrictive

Options are described below.

8.1.2 Option 1 – Status Quo

Retain the District Plan provisions as they are, as described above in the Resource Management Issues Analysis section. Retaining the status quo means accepting the current situation will perpetuate existing outcomes.

8.1.3 Option 2 – Enabling

Rule NH-R33 is amended to align with the key components of Section 4.3.5.2 of the NZS4404:2010 so its reference can be removed to allow a range of solutions that provide protection of buildings from adverse flood effects.

Buildings that are protected from flood hazards are a permitted activity.

Permitted activity conditions include the 1% AEP design storm level being less than 300mm and foul water drainage systems[3] must be protected from flood water ingress for the 1% AEP design storm level plus freeboard. A definition for 1% AEP design storm level is also included.

Any room, which is not a habitable room that is below the 1% AEP design storm level plus freeboard that complies with permitted activity performance standards is a permitted activity.

Minor additions and alterations to existing buildings below the 1% AEP design storm level plus freeboard that comply with permitted activity performance standards are a permitted activity.

Activities that do not comply with Rule NH-R33, and the permitted activity performance standards for rooms which are not habitable and additions to existing buildings will require resource consent as a restricted discretionary activity.

8.1.4 Option 3 – Conservative

Rule NH-R33 is amended to align with the key components of Section 4.3.5.2 of the NZS4404:2010 so its reference can be removed, allowing a range of foundation solutions that provide protection of buildings from adverse flood effects.

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[3] Foul water, and foul water drainage systems as defined in the Building Code as: *Foul water - the discharge from any sanitary fixtures or sanitary appliances. Foul water drainage systems – drains, joints and fittings normally laid underground and used specifically for the conveyance of water from the plumbing system to an outfall*

Buildings that are protected from flood hazards are a permitted activity.

Permitted activity conditions include the 1% AEP design storm level being less than 300mm and foul water drainage systems must be protected from flood water ingress for the 1% AEP design storm level plus freeboard. A definition for 1% AEP design storm level is also included.

Any room, which is not a habitable room that is below the 1% AEP design storm level plus freeboard requires resource consent as a restricted discretionary activity.

Additions to existing buildings below the 1% AEP design storm level plus freeboard require resource consent as a restricted discretionary activity.

Restricted discretionary activities can be declined or granted (with or without conditions).

Activities that do not comply with Rule NH-R33 are a discretionary activity.

8.2 Analysis of Options to Achieve Objective

Section 32(1)(b)(ii) requires that an evaluation report must assess the efficiency of and effectiveness of the provisions (options) in achieving the objective. Section 32(2) outlines that the efficiency and effectiveness assessment must:

> *"An assessment under subsection (1)(b)(ii) must:*
> *a) identify and assess the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for-*
> *i) economic growth that are anticipated to be provided or reduced; and*
> *ii) employment that are anticipated to be provided or reduced; and*
> *b) if practicable, quantify the benefits and costs referred to in paragraph (a); and*
> *c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions."*

8.2.1 Evaluating Effectiveness

Effectiveness generally means consideration of the extent to which an intended outcome will be achieved by an option.

In this case, the relevant outcome against which effectiveness of an option should be assessed is:

- Provide a robust and coherent rule framework for flood hazard management that provides positive outcomes for the Council and District Plan users alike.

An option should be evaluated as reasonably effective and not fatally flawed before its efficiency is considered.

8.2.2 Evaluating Efficiency

7.5.1 Appendix 1 - Proposed Plan Change 4 – Amendments to the Building Platform Level for Flood Risk Management and Mitigation – Section 32 Evaluation Report(Cont.)

The most efficient option will be the one that can achieve the outcome at least overall or net cost, taking into account all costs and benefits arising from the intervention. This is confirmed and emphasised by the Environment Court in Royal Forest & Bird Protection Society Inc v Whakatāne District Council [2017] NZEnvC 051[4].

The obligation under section 32(b)(ii) is to give effect to the objective in the least restrictive manner possible or at the least cost possible.

Hence the efficiency of options can be evaluated and compared by assessing the following:

a) Costs and benefits of establishing the provisions; and
b) Costs and benefits of compliance with the provisions.

[4] "(59) In considering what rule may be the most appropriate in the context of the evaluation and section 32 of the Act, we consider that notwithstanding the amendments that have been made to that section in the meantime, the presumptively correct approach remains as expressed in Wakatipu Environmental Society Inc v Queenstown Lakes District Council: that where the purpose of the Act and the objectives of the plan can be met by a less restrictive regime then that regime should be adopted. Such an approach reflects the requirement in section 30(1)(b)(ii) to examine the efficiency of the provision by identifying, assessing and, if practicable, quantifying all of the benefits and costs anticipated from its implementation. It also promotes the purpose of the Act by enabling people to provide for their well-being while addressing the effects of their activities.

8.3 Evaluation of District Plan Options

The following table evaluates the District Plan options in terms of their effectiveness and efficiency.

Costs (Environmental, Economic, Social and Cultural)	Benefits (Environmental, Economic, Social and Cultural)	Effectiveness / Efficiency
Option 1 - Status Quo		
The rule as it stands means that resource consent for a discretionary activity is required to use piled foundations to raise a building platform level that is below the 1% AEP design storm level to a specified height above the 1% AEP design level plus any freeboard required. The discretionary assessment of these activities creates social and economic costs due to less certainty in the gaining of resource consent for the applicant as well as the burden of costs and delays in being able to undertake the building work. Compliance with Rule NH-R33 means the building platform level of any room, which is not a habitable room cannot be lower than the building platform level of the rest of the building. Compliance with Rule NH-R33 means the building platform level of an addition to a building must be higher than the existing building platform level. Requiring compliance for additions results in internal stairs between the existing and new building platform level. There are health and safety implications as stairs are a trip hazard. Compliance with Rule NH-R33 and the discretionary assessment of non-complying activities provides a barrier to the improvement of the Whakatane District's housing stock and	There are no additional costs to Council through undertaking a plan change.	The efficiency and effectiveness of Rule NH-R33 has been compromised due to its inconsistency with Section 4.3.5.2 of the NZS4404:2010, and potential for undesirable outcomes as outlined in the Resource Management Issue Analysis section.

Costs (Environmental, Economic, Social and Cultural)	Benefits (Environmental, Economic, Social and Cultural)	Effectiveness / Efficiency
a built environment which is less resilient to climate change impacts. Compliance with Rule NH-R33 has social, cultural and economic costs for the community as it provides a barrier for people who are seeking to add value to their homes.		
Option 2 - Enabling		
Cost to Council of progressing plan change. People will need to familiarise themselves with a new rule framework.	The changes sought will better enable the improvement of building stock and improve the ability of buildings to withstand inundation whilst allowing people to meet their social and cultural needs. The changes sought will better provide for the social and economic wellbeing of the community by allowing people to add value to their homes and increase flood resilience with low compliance costs.	Amending Rule NH-R33 to be consistent with the key components of Section 4.3.5.2 of the NZS4404:2010 and including a definition for the 1% AEP design storm level removes uncertainty in the rule's application making it more effective. Adding permitted activity performance standards will improve the efficiency of Council's consenting processes. The use of restricted discretionary assessment criteria for activities which do not comply with permitted activity performance standards creates a more efficient consenting pathway as the matters over which Council has restricted its discretion are specified.
Option 3 - Conservative		
Cost to Council of progressing plan change. Costs to applicants for obtaining resource consents for attached garages and additions to existing buildings. People will need to familiarise themselves with a new rule framework.	The changes sought will enable the improvement of building stock and improve the ability of buildings to withstand inundation.	Amending Rule NH-R33 to be consistent with the key components of Section 4.3.5.2 of the NZS4404:2010 so its reference can be removed and including a definition for the 1% AEP design storm level removes uncertainty in the rule's application making it more effective. Proposals to build rooms which are not habitable and additions to existing buildings below the 1% AEP design storm level plus freeboard require a resource consent

Costs (Environmental, Economic, Social and Cultural)	Benefits (Environmental, Economic, Social and Cultural)	Effectiveness / Efficiency
		increasing the cost of compliance for these activities. The use of restricted discretionary assessment criteria for rooms which are not habitable and additions to existing buildings is an inefficient option when considering that these activities will have a minor increase on the overall level of risk from the flood hazard.

8.4 Risk of Acting or Not Acting

Risks of acting are low:

- Council is enabling further development within flood prone areas, which over the long term could expose more people to the risk of flood hazards. However, rooms which are not habitable and minor alterations and additions, new development and redevelopment will result in building platform levels being raised over time, thereby reducing the overall level of flood risk.

Risks of not acting are moderate:

- The existing District Plan provisions are not efficient or effective and will continue to create difficulty for Council and District Plan users alike; and
- The existing District Plan provisions will create undesirable and impractical outcomes for rooms which are not habitable and minor additions and alterations to existing buildings.

9 Preferred Option

Option 2 Enabling introduces an enabling rule framework and is assessed as the most efficient and effective option. An enabling approach can be more effective in achieving the desired natural hazard outcomes of Objective NH-O1 of the District Plan. The rules proposed by Option 2 will ensure that new development and redevelopment will be protected from flood risk to an appropriate level and will not increase the overall level of flood risk.

Option 3 Conservative will ensure that new development and redevelopment will be protected from flooding risk to an appropriate level; however, this option requires a restricted discretionary resource consent for additions to existing buildings and rooms which are not habitable. This high level of regulation reduces the efficiency of this option when these activities will have a minor increase on the overall level of risk to the flood hazard.

Option 1 Status Quo is an inefficient and ineffective outcome for Council and Plan users alike. The efficiency and effectiveness of Rule NH-R33 has been compromised due to its inconsistency with section 4.3.5.2 of the NZS 4404:2010. Rule NH-R33 as it stands requires that a resource consent for a discretionary activity is required to allow the use of piled foundations to raise a building platform level that is lower than the 1% AEP design storm level to a specified height that is above the 1% AEP design storm level plus any freeboard amount required. Any building platform levels including those for rooms which are not habitable and additions to existing buildings proposed to be below the 1% AEP design storm level plus freeboard do not comply with Rule NH-R33 and are assessed as a discretionary activity. It is unreasonable for activities which do not comply with the rule, to have a wide scope of assessment for the proposal when the only issue is flood risk.

9.1 Evaluation of proposed provisions for Option 2

The provisions applying to the preferred option are discussed below.

Definition/rule/assessment criteria	Comment
Definition – "Building Platform Level"	The addition of this definition will provide clarity and certainty for the Council and District Plan users alike.
Definition – "1% AEP design storm level"	The addition of this definition will provide clarity and certainty for the Council and District Plan users alike. The definition enables flood estimation to take into account the most up to date national guidance without a need to change the District Plan.
Definition – "Freeboard"	The addition of this definition will provide clarity and certainty for the Council and District Plan users alike.
Rule NH-R33.1 - Building Platform Level	Amending Rule NH-R33 to align with the key components of Section 4.3.5.2 of the NZS4404:2010 so its reference can be removed will provide more clarity in its application and improve outcomes for Council and District Plan users alike. Amending Rule NH-R33 will enable piled foundations to be used to achieve a building with the same level of protection as an excavated/raised building platform. This option will allow natural overland flow to occur rather than requiring stormwater and overland flowpath management around an elevated building platform. A table that includes the required minimum freeboard heights will provide clarity and certainty for Council and District Plan users as they will no longer need to use a separate standard to establish these heights. The inclusion of a description for how freeboard should be measured will provide clarity and certainty for Council and District Plan users alike. A 1% AEP design storm level of less than 300mm provides certainty that the activity will not be permitted if the flood risk to the safety of people is more than low. Defra and Agency[5] outline that flood depth below 300mm with a velocity of 0.3m/s or less, has a low degree of flood hazard. The Australian Institute for Disaster Resilience – Technical flood risk management guideline: Flood hazard; also outlines that

[5]. Defra and Agency. (May 2008). *Supplementary Note on Flood Hazard Ratings and Thresholds for Development Planning and Control Purpose – Clarification of the Table 13.1 of FD2320/TR2 and Figure 3.2 of FD2321TR1*. Department for Environment, Food & Rural Affairs & Environment Agency. Note: Defra or the Department for Environment, Food and Rural Affairs is a ministerial department of the Government of the United Kingdom. It is responsible for environmental protection, food production and standards, agriculture, fisheries and rural communities in the entire United Kingdom.

	a flood depth below 300mm with a velocity less than 2m/s is generally safe for people, vehicles and buildings[6]. Ingress of stormwater into foul water drainage systems adversely impacts the ability of the network to function during flood events. Protecting foul water drainage systems from floodwater ingress prevents overload of the wastewater system.
Rule NH-R33.2 – Exemptions from Rule NH-R33.1	Rule NH-R33.2 provides clarity and certainty to Council and District Plan users alike about what activities are exempt from the requirements of Rule-NHR33.1. The proposed rule allows for rooms, which are not habitable to have a lower building platform level than the rest of the dwelling. This means that there is limited risk to life. This activity would have previously been assessed as a discretionary activity. Providing permitted activity standards means the activities prescribed by Rule NH-R33.2 can be carried out without the need for a resource consent. For rooms, which are not habitable, using material that is resistant to inundation reduces flood risk to the building. Protecting foul water drainage systems from floodwater ingress prevents overload of the wastewater system. Requiring electrical work to be above the 1% AEP design storm level plus freeboard is the main life safety aspect. For additions, the proposed rule allows additions to have a building platform level matching the rest of the existing building thereby maintaining physical amenity for building users. For additions, the addition not being able to exceed 20m^2 in floor area provides certainty regarding the maximum size of additions allowed as a permitted activity. Limiting the increase in floor area, will not result in a significant increase in risk. No additional independent dwelling unit can be created under the rule. The 20m^2 limit is consistent with Rule NH-R7 Alterations and additions of existing building or structure in the CHEPA. For additions, a 1% AEP design storm level of less than 300mm on the site provides certainty that the activity will not

[6] Australian Disaster Resilience Guideline 7-3: Technical flood risk management guideline: Flood hazard, 2014, Australian Institute for Disaster Resilience CC BY-NC

7.5.1 Appendix 1 - Proposed Plan Change 4 – Amendments to the Building Platform Level for Flood Risk Management and Mitigation – Section 32 Evaluation Report(Cont.)

	be permitted if flood risks to the safety of people are more than low. For additions, protecting foul water drainage systems from floodwater ingress prevents overload of the wastewater system. For alterations, the proposed rule provides certainty that alterations within the footprint of existing buildings will not be captured under Rule NH-R33.1.
Rule NH-AC8 – Building platform levels that do not comply with Rules NH-R33	A flood risk assessment provided by a suitably qualified and experienced practitioner as described in Appendix L of the RPS ensures that the content of the flood hazard consequence assessment complies with good practice and professional standards. The Council has the ability to accept or decline the application if there is no functional or operational need for the building platform level to be below the 1% AEP design storm level plus freeboard. The proposed matters of discretion require an assessment that ensures the onsite and offsite effects of flood displacement are managed, protecting people and property. The proposed matters of discretion require an assessment of whether the activity affects the storage and conveyance capacity of flood water further mitigating the effects the activity will have during a flood event. A condition requiring the safe evacuation or refuge for occupants if inundation occurs further mitigates the risk to life. The matters of discretion apply conditions that building materials, building systems and services are resistant to inundation, improving the resilience of the building if inundation were to occur. The matters of discretion apply conditions that measures must be taken to avoid objects being mobilised during a flood event, further mitigating the effects the activity will have during a flood event.

10 Conclusion

Council proposes a plan change to the District Plan to improve the efficiency and effectiveness of the performance-based framework the District Plan uses to manage and mitigate risk from flood hazards.

The evaluation of the effectiveness and efficiency of the options has concluded that Option 2, an enabling approach, is the preferred option. The enabling approach provides the best outcome with the greatest overall environmental, economic, social and cultural benefits, with strong alignment with Objective NH-O1 of the District Plan and is the most appropriate way to achieve the Plan Change objectives.

11 References

1. National Institute of Water and Atmospheric Research Ltd (2019). *Climate change projections and impacts for the Bay of Plenty Region.* Client report 2019218AK for Bay of Plenty Regional Council.
2. Defra and Agency. (May 2008). *Supplementary Note on Flood Hazard Ratings and Thresholds for Development Planning and Control Purpose – Clarification of the Table 13.1 of FD2320/TR2 and Figure 3.2 of FD2321TR1*. Department for Environment, Food & Rural Affairs & Environment Agency.
3. Australian Disaster Resilience Guideline 7-3: Technical flood risk management guideline: Flood hazard, 2014, Australian Institute for Disaster Resilience CC BY-NC.

Appendix 1: Proposed Plan Change 4 Provisions

Changes are shown with new text underlined and deleted text is shown as ~~strikethrough~~.

Add the following Definition – "Building platform level"

Building platform level

Means the NZ Vertical Datum height of the underside of a concrete floor slab, or, for a piled foundation, the underside of the floor joists.

Add the following Definition – "1% AEP design storm level"

1% AEP design storm level

*Means the level of the modelled 1% **annual exceedance probability** (AEP) event, that has taken into account the effects of climate change over at least a 100-year timeframe. Note: A range of climate change scenarios are able to be used.*

Add the following Definition – "Freeboard"

Freeboard

Means a provision for flood level design estimate imprecision, construction tolerances, and natural phenomena (such as waves, debris, aggradations, channel transition, and bend effects) not explicitly included in the calculations.

Amend the Following Rule:

Rule NH-R33 Building platforms for flood risk management and mitigation

Rule NH-R33.1

*Except as provided for in Rule NH-R33.2, ~~A~~all **building platform~~s~~** **levels**~~, other than those for detached and non-habitable accessory building,~~ must account for flooding ~~and include stormwater system designed~~ to the **1% AEP design storm level** and include **freeboard** which is no less than that listed in Table 1, ~~in accordance with NZS4404:2010 Land Development and Subdivision Infrastructure Section 4.3.5.2 or subsequent revision~~ provided that; ~~the minimum free board shall be measured to the building platform level, not the underside of the floor joists or underside of the floor slab.~~*

a) ***freeboard** shall be measured from the **1% AEP design storm level** to the underside of the floor slab or underside of the floor joists as applicable; and*
b) *the **1% AEP design storm level** shall be less than 300mm above the level of the ground immediately below the **building** as proposed, as adjusted to include any fill or cut required for the **building**; and*
c) *foul water drainage systems connected to a Council reticulated wastewater network must be protected from flood water ingress for the **1% AEP design storm level** plus any **freeboard**.*

*Advice note: Figure 56 provides guidance concerning the relationship between the **1% AEP design storm level**, **freeboard** and the **building platform level**.*

NH-R33.2 Exemptions from Rule NH-R33.1 are:

a) *Any **accessory building** which is both detached and does not include a **habitable room**.*
b) *Any room, which is not a **habitable room**, and is attached to a **dwelling**, provided that:*
   (i) *the building elements of the room below the **1% AEP design storm level,** plus any **freeboard** as required under Rule NH-R33.1, must be constructed with materials resistant to periodic flooding; and*
   (ii) *electrical fittings must be above the **1% AEP design storm level** plus any **freeboard** as required under Rule NH-R33.1.*
c) *Any **addition** to any existing **building** that contains a **habitable room**, provided that;*
   (i) *the **1% AEP design storm level** shall be less than 300mm above the level of the ground immediately below the **building** as proposed, as adjusted to include any fill or cut required for the **addition** to the **building**; and;*
   (ii) *the **building platform level** of the **addition** must be at or above the existing **building platform level** of the **building**; and*
   (iii) *the floor area of the **addition** must not exceed 20m^2; and*
   (iv) *foul water drainage systems connected to a Council reticulated wastewater network must be protected from flood water ingress at the **1% AEP design storm level** plus any **freeboard** as required under Rule NH-R33.1.*

*d) **Alterations** to any existing **building**, provided that:*
*(i) the **alterations** are wholly contained within the existing **building**; and*
*(ii) the **alterations** do not result in the creation of any new or additional **dwelling** on the site; and*
*(iii) the **building platform level** of the alterations must be at or above the existing **building platform level** of the **building**.*

Include the following Table

NH-R33.3 – Table 1 Minimum Freeboard Height Requirements	
Dwellings and accessory buildings for habitation	*0.5m*
Commercial and industrial buildings	*0.3m*

Add the following Restricted Discretionary Activity

*NH-AC8 **Building platform levels** that do not comply with Rule NH-R33;*

1. Standards and Terms

a) A Flood Risk Assessment must be provided by a suitably qualified and experienced person as described in RPS Appendix L – Methodology for Risk Assessment. The Flood Risk Assessment must demonstrate the extent to which the proposal mitigates flood risk after the development is completed, including:
(i) other works to increase flood storage on the property;
(ii) the effects of any decrease in flood storage on the property;
(iii) the effects on the conveyance of water in overland flow paths and on other properties;
(iv) provision for safe evacuation and refuge of occupants in a flood event;
*(v) resilience of the **building** structure and materials to flooding;*
*(vi) protection of **building** systems and services from flooding.*

2. Council shall restrict its discretion to;

*a) whether there is a functional or operational need for the **building platform level** to be below the **1% AEP design storm level** plus **freeboard**, including the consideration of alternative locations and methods; and*
*b) the degree to which the **building** fails to comply with Rule NH-R33; and*
c) the extent to which the proposal mitigates flood risk after the development is completed, including:
(i) other works to increase flood storage on the property;

(ii) the effects of any decrease in flood storage on the property;
(iii) the effects on the conveyance of water in overland flow paths and on other properties;
(iv) provision for safe evacuation and refuge of occupants in a flood event;
*(v) resilience of the **building** structure and materials to flooding;*
*(vi) protection of **building** systems and services from flooding.*

Delete and replace NH-R33 Figure 56 Freeboard illustration with the following:

*Figure 2 - NH-R33 Figure 56 Freeboard illustration: Figure 56 provides guidance concerning the relationship between the **1% AEP design storm level**, **freeboard** and the **building platform level***

Appendix 2: PC4 RPS Analysis

Analysis of the Bay of Plenty Regional Policy Statement, in particular Natural Hazards, for Proposed Plan Change 4 (PC4) – Minimum Building Platform Level.

Policy		Assessment of PC4 against policy
Objective 31	Avoidance or mitigation of natural hazards by managing risk for people's safety and the protection of property and lifeline utilities	PC4 will avoid or mitigate natural hazards by managing risk for people's safety and the protection of property. Risk is managed by clarifying the intent of Rule NH-R33 and providing these outcomes: • amending Rule NH-R33.1 to align with the key components of Section 4.3.5.2 of the NZS4404:2010 so its reference can be removed, and allowing new buildings in floodable areas provided building platform levels are above the 1% AEP design storm level plus freeboard, and the 1% AEP design storm level presents a low risk; • adding a new rule NH-R33.2 that provides for activities in flood prone areas that are exempt from Rule NH-R33.1; • A restricted discretionary activity for other buildings in floodable areas, subject to consideration of need for and mitigation of risk. Risk is managed, by requiring that buildings in flood-prone areas are made from materials that can withstand inundation and additions to buildings are limited in floor area. Risk is managed through the need for resource consent and or building consent for building works.
Policy IR 2B: Having regard to the likely effects of climate change	Recognise and provide for the predicted effects of climate change having particular regard to:	PC4 is consistent with Policy IR 2B as the BOPRC and WDC modelling that informs the 1% AEP design storm level used for development control has the effects of climate change included.

	(a) Predicted increase in rainfall intensity, taking account of the most recent national guidance and assuming a minimum increase in the annual mean temperature of 2°C by 2090 (relative to 1990 levels); and (b) Predicted increase in sea level, taking into account the most recent national guidance and the minimum sea-level rise projections in Policy NH 11B.	
Policy NH 1B: Taking a risk management approach	Take a risk management approach to control the use, development and protection of land to avoid or mitigate natural hazards by assessing the level of risk according to the likelihood of natural hazards occurring and their potential consequences.	Policy NH1B provides the framework for the management of natural hazards. It applies to the development of plans and to the considerations of resource consent applications. The District Plan already takes a risk management approach to management of flooding and inundation. Building platform levels are required to be raised above modelled flood levels to achieve a low-risk outcome. PC4 takes a risk reduction approach to the management of land use, subdivision and development to ensure that the risk of flooding is avoided or mitigated over time. PC4 provides greater flexibility in controlling development on flood prone land and reduces compliance costs, while still achieving the same low risk outcomes.
Policy NH 2B: Classifying risk	Classify risk according to the following three category risk management framework as detailed in Appendix L: 1. High natural hazard risk being a level of risk beyond what should be tolerated; 2. Medium natural hazard risk being a level of risk that exceeds the Low level but does not meet the criteria for High risk;	The existing provisions in the District Plan reflect an earlier assessment of natural hazard risk. The purpose of PC4 is to clarify how the associated rules are implemented. The Council is progressing modelling to establish where there are levels of high, medium and low flood risk. The current status of the draft modelling indicates a level of medium risk from flooding for the Whakatāne Urban Area. In areas of known high risk, District Plan and Building Code provisions are applied to reduce the risk through the statutory consenting systems.

	3. Low natural hazard risk being the level of risk generally acceptable. The policy direction associated with these levels of risk is set out in Policy NH 3B Natural hazard risk outcomes.	Additions to buildings complying with the proposed permitted activity status do not increase the overall level of risk because there will be no change to the number of buildings functionally compromised after an event. Risk to buildings is also managed through the natural hazard provisions of the Building Act 2004.
Policy NH 3B: Natural hazard risk outcomes	By the application of Policies NH 4B and NH 12A, achieve the following natural hazard risk outcomes at the natural hazard zone scale*: (a) In natural hazard zones subject to High natural hazard risk reduce the level of risk from natural hazards to Medium levels (and lower if reasonably practicable); and (b) In natural hazard zones subject to Medium natural hazard risk reduce the level of risk from natural hazards to be as low as reasonably practicable; and (c) In natural hazard zones subject to Low natural hazard risk maintain the level of risk within the Low natural hazard risk range. *The risk outcome specific to new development on specific development sites is set out in Policy NH 4B.	Reducing risk from high levels will need to occur over time. These timeframes may span years or even decades in order to manage disruption and cost. This is particularly true when risk reduction relies on land development and redevelopment processes, as in this instance, that relate to design life of buildings and infrastructure.
Policy NH 4B: Managing natural hazard risk on land subject to urban development	Require a Low natural hazard risk to be achieved on development sites after completion of the development (without increasing risk outside of the development site) by controlling the form, density and design of: (a) Greenfield development; (b) Any urban activity within the existing urban area that involves the construction of new and/or additional buildings or reconstruction of or addition to existing	By clarifying the intent of Rule NH-R33, PC4 is not to increase natural hazard risk. Any new dwellings or other buildings will be required to have building platform levels elevated above the 1% AEP design storm level. PC4 is not increasing natural hazard risk by providing plan provisions for additions to existing dwellings.

	buildings (including any subdivision associated with such activities); and (c) Rural lifestyle activities; except that a Low level of risk is not required to be achieved on the development site after completion of the development where the development site is located within a natural hazard zone of Low natural hazard risk and that natural hazard zone will maintain a Low level of natural hazard risk after completion of the development.	
Policy NH 5B: Avoiding increasing and encouraging reducing natural hazard risk in the coastal environment.	Despite Policies NH 3B, NH 4B and NH 12A, ensure that on any land within the coastal environment that is potentially affected by coastal erosion or coastal inundation over at least the next 100 years: (a) no land use change or redevelopment occurs that would increase the risk from that coastal hazard; and (b) land use change or redevelopment that reduces the risk from that coastal hazard is encouraged.	PC4 clarifies the intention of Rule NH-R33 and does not increase the risk from coastal hazards.
Policy NH 6B: Exemptions from the natural hazard risk management approach	Policies NH 3B, NH 4B, NH 5B and NH 12A do not apply to the establishment, operation, maintenance and upgrading of activities that have more than low natural hazard risk or which are located in high and medium risk natural hazard zones if the activity: (a) Has a significant social, economic, environmental or cultural benefit to the community it services, or is a lifeline utility; and (b) Has a functional need for the location.	Significant Social Cultural buildings are subject to the Discretionary consent process where the natural hazards framework of the District Plan would be applied.

Policy NH 7A: Identifying areas susceptible to natural hazards	Identify natural hazards and the locations where those natural hazards could affect people, property and lifeline utilities by mapping hazard susceptibility areas for the following natural hazards: (c) Coastal/marine processes (i) coastal erosion; and (ii) coastal inundation. (d) Extreme rainfall (i) landslip and debris flow/flood; and (ii) flooding.	Council is undertaking an ongoing programme of modelling for fluvial, pluvial and coastal flooding to incorporate climate change scenarios. Outputs from the modelling will provide mapping of flood hazard susceptibility areas. The district plan rules will provide for floor levels elevated above the design flood levels output from the modelling.
Policy NH 8A: Assessment of natural hazard risk at the time of plan development	Assess natural hazard risk by: (a) Defining natural hazard zones within hazard susceptibility areas; and (b) Determining the level of natural hazard risk within each natural hazard zone by undertaking a risk analysis using the methodology set out in Appendix L; and (c) Classifying natural hazard risk within each natural hazard zone as either High, Medium or Low natural hazard risk using the methodology set out in Appendix L.	Policy NH 8A is an “A” policy and must therefore be given effect in the context of regional and district plan development. The existing provisions in the District Plan reflect an earlier assessment of natural hazard risk. The purpose of PC4 is to clarify how the associated rules are implemented.
Policy NH 11B: Providing for climate change	Incorporate the effects of climate change in natural hazard risk assessment. Authoritative up-to-date projections of changes in sea level, rainfall, temperature, and storm frequency and severity will be used as updated scientific data become available. Use the following projections as minimum values when undertaking coastal hazard assessments:	The Council’s and BOPRC’s assessment of flood hazard susceptibility incorporates climate change. PC4 is consistent with Policy IR 2B as the BOPRC and WDC modelling that informs the 1% AEP design storm level used for development control has the effects of climate change included.

	(a) A 100-year time frame; (b) A projection of a base sea-level rise of at least 0.6 m (above the 1980–1999 average) for activities/developments which are relocatable; (c) A projection of a base sea-level rise of 0.9 m (above 1980–1999 average) for activities where future adaptation options are limited, such as regionally significant infrastructure and developments which cannot be relocated; and (d) An additional sea-level rise of 10 mm/annum for activities with life spans beyond 2112.	
Policy NH 12A: Managing natural hazard risk through regional, city and district plans	Promote the natural hazard risk outcomes set out in Policy NH 3B by: (a) Providing for plans to take into account natural hazard risk reduction measures including, where practicable, to existing land use activities, and, where necessary, (b) Controlling the location, scale and density of the subdivision, use, development and protection of land and land use change in city, district and regional plans. (c) Ensuring that regional, city and district plan provisions provide a high degree of certainty for the establishing and maintaining of essential risk reduction works and other measures.	District Plan changes are proposed to improve the application of provisions that have the purpose of mitigating flood risk and provide natural hazard risk reduction. Rule NH-R33 will be amended to remove ambiguity surrounding the rule's application. The amendment that has been proposed will provide appropriate certainty to enable natural hazard risk reduction. Permitted activity criteria have been proposed that will allow an activity to be undertaken (that otherwise would have been discretionary). The provisions proposed will provide appropriate certainty to enable natural hazard risk reduction. A restricted discretionary status has been proposed that will allow an activity to be undertaken (that otherwise would have been discretionary). The provisions proposed will provide appropriate certainty to enable natural hazard risk reduction.
Policy NH 13C: Allocation of responsibility for natural hazard identification and risk assessment	Require the natural hazard identification and risk assessment approach described in Policies NH 1B, NH 2B and NH 7A to NH 10B above to be given effect to by:	WDC provides the 1% AEP design storm level for the Whakatāne urban area.

	(a) Regional council undertaking area-based natural hazard susceptibility mapping in accordance with Policy NH 7A for: (i) Hazards related to volcanic activity; (ii) Hazards related to earthquakes; (iii) Tsunami; (iv) Coastal erosion and coastal inundation; and (v) Flooding from natural water courses outside urban areas with reticulated stormwater networks. (b) Regional council undertaking area-based natural hazard risk analysis and evaluation in accordance with Policy NH 8A for: (i) Hazards related to volcanic activity; (ii) Liquefaction; and (iii) Tsunami. (c) City and district councils undertaking area-based: (i) Natural hazard susceptibility mapping in accordance with Policy NH 7A for those hazards listed in Policy NH 7A that are not listed in (a) above; and (ii) Natural hazard risk analysis and evaluation in accordance with Policy NH 8A for those hazards listed in Policy NH 7A that are not listed in (b) above	BOPRC provides the 1% AEP design storm level for natural water courses outside urban areas with reticulated stormwater networks and coastal inundation.

Policy NH 14C: Allocation of responsibility for land use control for natural hazards	The Bay of Plenty Regional Council, city and district councils shall be responsible for specifying objectives, policies and methods, including any rules, for the purpose of the control of the use of land for the avoidance or mitigation of natural hazards...on land except land in the coastal marine area: Responsibility for developing objectives and policies – City and District councils and Bay of Plenty Regional Council Responsibility for developing any rules – City and District Councils Responsibility for developing methods other than rules - City and district councils and Bay of Plenty Regional Council.	The purpose of PC4 is to clarify the intent of a rule and propose additional rules for the control of the use of land for the avoidance or mitigation from flood hazards. PC4 is consistent with Policy NH 14C.

7.6 Annual Plan 2025-26 – Project Commencement

To:	**Environment, Energy and Resilience Committee**
Date:	**Thursday, 7 November 2024**
Author:	**H Allison / Senior Strategic Policy Analyst**
Authoriser:	**L Woolsey / Acting GM Strategy and Transformation**
Reference:	**A2775786**

1. Reason for the report - *Te Take mō tēnei rīpoata*

The purpose of this report is to provide the Environment, Energy and Resilience Committee with the timeline of the Annual Plan 2025-26 project and to establish key principles and approach.

2. Recommendations - *Tohutohu akiaki*

1. THAT the Annual Plan 2025-26 – Project Commencement report be **received**; and
2. THAT the Environment, Energy and Resilience Committee **confirm** the approach to the Annual Plan 2025-26.

3. Background - *He tirohanga whakamuri*

The Local Government Act 2002 (LGA) requires the adoption of an Annual Plan prior to the start of each financial year. As such, the Council is required to adopt an Annual Plan for 2025-26 on or before 30 June 2025. If the Council does not adopt an Annual Plan, it may not set rates for the year.

The Annual Plan 2025-26 will look to update and implement the second year of the Whakatāne District Council Long Term Plan 2024-34 (LTP). The purpose of an Annual Plan is to allow for variations to a LTP, outline the proposed annual budget and funding impact statement for the year; provide integrated decision making and co-ordination of the resources of the Council; and contribute to the accountability of the Council to the community. If proposed variations for 2025-26 are not of a significant or material magnitude compared to the LTP, consultation on the Annual Plan is not automatically required (LGA s95(2A)).

4. Issue/subject – *Kaupapa*

4.1. Project Objectives

A project to develop the Annual Plan for the 2025-26 year has commenced and is supported by a project team and project plan. The project aims to deliver:

1. A process to develop the budget for the 2025-26 financial year to support implementation of the corresponding year of our Long-Term Plan.
2. A process to consider variations to the intended budget and work programme for 2025-26 year compared to what has been set out and agreed through Council's Long-Term Plan.
3. A process to update Fees and Charges for the coming year if/where needed.
4. Engagement campaign including consultation on any significant changes if/where needed.
5. Adoption and publication of a final Annual Plan 2025-26.

4.2. Approach

Our approach to the development of the Annual Plan acknowledges that the adoption of the Long-Term Plan has only recently set budgets and work programmes for the coming year. Usually, significant changes to budgets and work programmes determined in the Long-Term Plan are not desired, however they are possible and sometimes necessary. Where necessary, changes should be accommodated within existing budget parameters set through Council's Long-Term Plan.

The approach we intend to take to the budget and work programme is to maintain or slightly reduce the proposed increase in rates outlined in the LTP for the 2025-26 year. Under direction of the Chief Executive, the project team will try to identify potential savings to alleviate the rating impact on the community. Changes to Fees and Charges will in the most part be inflationary only and we are continuing to keep an eye on Central Government Reforms such as Local Waters Done Well and the Local Government Reform that may have an impact on the 2025-26 year.

Financial assumptions including updated interest rates and inflation will be factored in the Annual Plan budget.

4.3. Project Schedule

A full detailed project plan and timeline has been developed for the Annual Plan. The project includes multiple touch points for elected members to guide the project. Key phases of the project are set out below.

Project phase	Timeframe
1. **Project launch and strategic direction**	**Now**
Project commencement report to Environment, Energy and Resilience Committee	7 November 2024
2. **Draft budget development – pre-Christmas**	**Oct - Dec 2024**
Review of budgets, work programmes, and fees/charges commences	Oct-Nov 2024
Key variations developed for Council consideration	Oct-Nov 2024
Risk and Assurance Committee to approve budget assumptions	29 Nov 2024
Council Briefing - Annual Plan V1 Budget	4 Dec 2024
3. **Draft budget finalisation – post-Christmas**	**Jan – Feb 2025**

Project phase	Timeframe
Council Briefing - Annual Plan V2 Budget	19 Feb 2025
Council meeting to approve final draft budget, changes to fees and charges, and significance and engagement assessment of variations	20 Mar 2025
4. **Engagement (consultation if required, otherwise information campaign)**	**Feb - May 2025**
Detailed engagement plan developed	Mid Mar 2025
Engagement collateral developed including consultation document (if required)	Mid-late Mar 2025
Engagement commences including formal consultation (if required)	Mar - Apr 2025
Submissions management and hearings (if formal consultation is required)	8 May 2025
5. **Final decision making**	**May - June 2025**
Environment, Energy and Resilience Committee deliberations (if required)	22 May 2025
Update of budgets and development of final Annual Plan document	May-Jun 2025
Council Meeting: Adopt Annual Plan, Fees and charges, and rates resolutions	26 June 2025
6. **Close off and Implementation**	**July 2025**
Publication / close engagement / update business plan / implement budget	July 2025

5. Options analysis - *Ngā Kōwhiringa*

5.1. Option 1 – Confirm approach to Annual Plan

Under this option, Council would endorse the approach to the Annual Plan set out in section 4.2 of this report.

Advantages

- Confirming the approach aligns with the recently adopted LTP, which sets expectations for budgets and work programs, reducing the need for significant adjustments.
- Maintains or slightly reduces the rate increase planned for Year 2 of the LTP by identifying savings.
- Meets legislative timeframes.

Disadvantages

- Does not allow for significant change to the Level of Service of any significant activity.

5.2. Option 2 – Do not confirm approach to Annual Plan

Under this option, the Council would not approve the approach to the Annual Plan set out in section 4.2 of this report, requiring staff to develop an alternative approach.

Advantages

- Allows the Council to directly influence and set direction for the Annual Plan approach.

Disadvantages

- An alternative approach could lead to substantial changes from the LTP, potentially requiring an LTP amendment which would trigger an audit of the Annual Plan.
- Risk to not meeting legislative timeframe (adopted before the commencement of 2025/26 financial year).

6. Significance and Engagement Assessment - *Aromatawai Pāhekoheko*

Consultation on the Annual Plan is not legislatively required unless proposed budget changes are significant, or material compared to the content of the adopted LTP. Following the budget workshops, an assessment of any proposed budget changes will be undertaken using the Council's Significance and Engagement Policy. A recommendation on whether or not to consult on the Annual Plan will be provided to Council post-Christmas, at the time draft budgets are formally approved.

A complete communications plan will not be finalised until the nature, scope and magnitude of any budget changes are known. Further information about proposed communication and consultation will be provided to the Committee as the project progresses.

7. Considerations - *Whai Whakaaro*

7.1. Financial/budget considerations

The cost of developing the Annual Plan 2025-26 will be met from existing budgets.

7.2. Strategic alignment

The Annual Plan is intended to be consistent with and support implementation of the direction set through Council's Long-Term Plan 2024-34. By definition, the development of the Annual Plan will identify any significant variances from this intention.

7.3. Climate change assessment

Budget and resourcing confirmed through the Annual Plan budget development will provide for continuation of Council's climate change programme. Based on this climate change assessment, the decisions and matters of this report are assessed to have low climate change implications and considerations, in accordance with the Council's Climate Change Principles.

7.4. Risks

The risk to the Annual Plan project (not a high risk) is one of ensuring legislative timeframes are met, which will be managed internally.

8. Next steps - *Ahu whakamua*

The project to develop the Annual Plan for the 2025-26 year will commence with key touch points for the project signalled in section 4.3 of this report.