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**Submission on Tauranga City Council Tauranga Climate Action and Investment Plan**

Te Whatu Ora leads the day-to-day running of the health system across Aotearoa New Zealand, and either provides or commissions services at local, district, regional and national levels. Under the Pae Ora (Healthy Futures) Act 2022, one of the key objectives of Te Whatu Ora is “to promote health and prevent, reduce, and delay ill-health, including by collaborating with other agencies, organisations, and individuals to address the determinants of health.” The National Public Health Service (NPHS) is a division of Te Whatu Ora and leads the delivery of Health Protection, Health Promotion and Prevention services, as well as working with the Public Health Agency and Te Aka Whai Ora on intelligence, population health and policy. As a Tiriti o Waitangi partner NPHS advocates for equitable health outcomes, by striving to eliminate health differences, particularly for Māori, and build towards pae ora (healthy futures) for everyone. Toi Te Ora Public Health (Toi Te Ora) is the public health service for the Bay of Plenty and Lakes regions.

Toi Te Ora supports evidence-based approaches to improving health and wellbeing. This includes promoting healthy environments and ensuring whānau and communities can live healthy lives. Toi Te Ora is committed to Pae Ora (healthy futures) for all.

**Background**

Toi Te Ora recognises climate change as an urgent threat to health and equity.

The effects of climate change are already evident, both locally and globally, with impacts anticipated to increase over the coming decades. There is clear evidence that a global temperature increase of 1.5°C above pre-industrial averages will result in irreversible and catastrophic health harms.[[1]](#footnote-1)

Climate change causes a range of impacts on health and wellbeing. The health consequences are serious and will harm whānau and communities and place increased stress on Aotearoa's health system.

Key direct and indirect threats to health include:[[2]](#footnote-2),[[3]](#footnote-3)

* Death, illness, and injury from extreme weather events, such as flooding and heat waves2
* Mental health impacts due to stress from extreme weather events, economic instability, and other climate related impacts
* Changes in infectious disease patterns, including increased risk of mosquito-borne diseases
* Water contamination following heavy rainfall events
* Increased food-borne illnesses related to rising temperatures
* Cardio-respiratory illness due to heat waves
* Food insecurity due to increased global food prices and local food supply disruptions
* Displacement and disruption due to environmental damage
* Increased strain on health and disability services

Recent extreme weather events, such as Cyclone Gabrielle and flooding in Auckland, reinforce the need for urgent and bold leadership on climate change. These events had devastating impacts with loss of life, severe damage to housing, roading and primary industries, and significant impacts on the mental health and wellbeing of the communities impacted.

**Climate Change and Equity**

The impacts of climate change are not experienced equally. Climate change has the potential to worsen existing health and social inequities for Māori, Pacific and low socioeconomic groups in Aotearoa.2,[[4]](#footnote-4)

Relationship with the natural environment is also critical for health and wellbeing for Māori, and degradation of the natural environment will harm whanau and iwi.4,[[5]](#footnote-5) Under Te Tiriti O Waitangi, Aotearoa has an obligation to eliminate inequities. Given the increased risk to health for Māori from climate change and the role of the natural world as a taonga, inaction or ineffective action represents a breach of Te Tiriti O Waitangi.

Additionally, Pacific Islands, and many other low and middle income nations, will be disproportionately impacted by climate change. Aotearoa has a responsibility to be ethical global citizens by urgently addressing climate change.

Climate change also presents an issue of generational equity. It is important we ensure that current generations leave a healthy, thriving planet for future generations to inherit.

**General Commentary**

1. We commend Tauranga City Council (Council) for progressing this Climate Change Action and Impact Plan (AIP) and recognising the role of the Council in mitigating and adapting to climate change. We commend your commitment to action. This plan has the potential to make substantial positive impacts on the health and wellbeing of current and future generations.
2. Toi Te Ora wish to reinforce that to achieve the outcomes in this AIP, priority actions must uphold Te Tiriti O Waitangi and centre equity.4,5 While climate mitigation policies have the potential to create health and equity gains, this needs to be deliberate. Without this focus, climate responses may worsen inequities.5 For example, the potential for increased costs of goods due to policy changes, such as the Emissions Trading Scheme, will disproportionately impact low-income households.4 Further development of the AIP must be made in partnership with tāngata whenua to uphold Te Tiriti obligations.
3. The plan highlights Council has limited direct influence over some interventions that have large impacts on Tauranga greenhouse gas emissions. However, we are of the opinion that Council is in a strong position to advocate for and influence positive change. For instance, the plan does include local actions to improve the greatest greenhouse emission source in New Zealand – transportation of marine freight. Toi Te Ora recommend collaboration with the Bay of Plenty Regional Council, Port of Tauranga and Maritime New Zealand locally to identify and develop actions.
4. Additionally, a focus on individual actions, such as people growing their own food and encouraging transport mode shift, is likely to mean opportunities for systemic change will be missed. Toi Te Ora recommends an emphasis on policies and infrastructure that will enable and support climate mitigation and adaptation by individuals, whanau, and across organisations in our communities. For example, ongoing and increased investment in active and public transport systems that enable safe, accessible, and convenient travel.
5. Please would you note and amend Appendix 4, which lists Te Whatu Ora BOPDHB as an external engagement partner to Toi Te Ora Public Health, National Public Health Service.

**Leadership - Mana Motuhake**

1. Toi Te Ora recommends that shared decision making with mana whenua and iwi is prioritised. This is important for all aspects of the AIP. Māori relationships with the natural environment are an essential aspect to hauora[[6]](#footnote-6). Additionally, Māori have rights to guardianship over the natural environment under Te Tiriti o Waitangi and the Declaration on the Rights of Indigenous Peoples.4
2. Toi Te Ora recommends returning to the use of Intergovernmental Panel on Climate Change (IPCC) science-based targets that were included in previous versions of the AIP. Science-based targets represent bold leadership for addressing climate change. This is important because the proposed science-based target demonstrates a genuine commitment to climate change mitigation effects.
3. The target is a way to measure progress and stay publicly accountable.
4. Toi Te Ora recommends that the fourth leadership outcome should include the “strategic direction” of Council. Application of climate change knowledge is integral to the resilience of the Tauranga community. Therefore, the strategic direction of Council and all planning documents and investments should be developed with climate change mitigation and adaptation as a priority.

Comments on specific actions:

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| G1 | Toi Te Ora highly recommends that Council returns to the original wording focused on setting a science-based emissions reduction target aligned to 1.5 degrees. |
| G3 | Toi Te Ora supports the inclusion of evaluating climate change risks and opportunities as part of decision-making processes. However, Toi Te Ora recommends strengthening this action by requiring climate change risks to be prioritised in decision making processes. |
| G9 | Toi Te Ora supports the involvement and alignment to Māori iwi. However, Toi Te Ora recommends that this priority is higher and that mātauranga Māori is applied to all outcomes of this plan.  Mātauranga Māori principles should also be reflected in the Council’s measures of success. |
| G10 | Toi Te Ora supports the inclusion of climate resilience and low carbon asset management strategy. Toi Te Ora recommends that this includes existing and future assets. |
| G12 | Toi Te Ora supports reviewing the Corporate Sustainability Plan and recommends that procurement policies include all Council owned facilities and Council run events. |

**Transport – Tauranga Ara Rau**

1. Toi Te Ora supports investment in infrastructure that promotes active and public transport. A well-designed transport system will contribute to improved health outcomes through a range of mechanisms, including reduced carbon emissions, improved air quality and increased physical activity.
2. The health impacts of transport emissions are considerable.[[7]](#footnote-7) In New Zealand, air pollution from motor vehicles alone is estimated to cause 2,247 premature deaths and nearly 9,400 hospitalisations annually. Decarbonising the Council transport system provides the opportunity for significant health gains due to improved air quality. Notably, the Mount Maunganui airshed has a polluted status due to breaches of the national standards for air quality.[[8]](#footnote-8),[[9]](#footnote-9)
3. Toi Te Ora recommend that the AIP incorporates the targets of Te hau mārohi ki anamata, Aotearoa New Zealand’s first emissions reduction plan. This document includes four transport related targets. To achieve these targets motor vehicle greenhouse gas emissions, need to reduce by approximately 41% by 2035 compared with 2019, and the transport sector needs to be largely decarbonised by 2050.
4. Transport emissions make up over 75% of the Council carbon footprint. Importantly, nearly 50% of those emissions come from marine freight. Toi Te Ora recommends Council consider options to reduce this sector’s contribution to greenhouse gas emissions. For example, supporting ships to connect to electricity when in port and progression towards only allowing ships powered by cleaner and renewable energy to dock.
5. Toi Te Ora recommends that Council invest in partnership with other agencies to support transitioning freight from road to rail and to support development of regional passenger rail.

Comments on specific actions:

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| T2 | Toi Te Ora supports the development of a diverse range of low carbon transport options. Specifically, Toi Te Ora recommends the prioritisation of park and ride options with dedicated bus lanes around the entire Tauranga City area, and appropriate timetable planning to meet consumer demands to reduce traffic congestion (supported by priority actions of T8 and 9). The establishment of park and rides should also provide access to storage for bicycles and scooters, and/or the ability to transport bikes on buses.  Toi Te Ora also recommends implementing deterrents for single commuter vehicle trips, such as congestion charges or toll roads in key areas such as Tauranga City, and Mount Maunganui.[[10]](#footnote-10) |
| T3 | Toi Te Ora supports the action to support an EV charging infrastructure plan. It is important to recognise that there should be caution that funding of such infrastructure is not prioritised at the expense of mode shift to active and public transport. EV infrastructure does not provide other benefits such as reducing traffic congestion or improving physical activity. Further prioritising EV infrastructure may disproportionately disadvantage those with the greatest need. |
| T4 | Toi Te Ora supports the need for Council to include climate risks in road asset management. However, Toi Te Ora recommends strengthening this action by requiring climate mitigation and adaptation to be a goal for road asset management planning. |
| T5 | Toi Te Ora recommends working with Bay of Plenty Regional Council to prioritise action T5 to electrify the bus fleet. This action will complement the investment into transport infrastructure whilst providing an immediate reduction in emissions. |
| T (“NEW”) | Toi Te Ora Public Health supports the action to ensure public transport provides access to all Council and Bay Venues public facilities. This is important to reduce inequities in accessing public facilities. Toi Te Ora also recommends providing multiple, efficient public and active transport routes to schools, educational facilities, key health facilities (hospitals and urgent care facilities) and supermarkets and food markets. |

**Land Use and Built Environment - Taiaohanga**

1. Toi Te Ora recommend further actions be developed in the land use and built environments section of the AIP. Toi Te Ora believe that the current actions are insufficient to achieve the Council goal of a “low emissions and climate resilient city”
2. The current SmartGrowth Strategy requires caution as development of green field areas will very likely lead to an expansion of roading networks and urban sprawl. This directly conflicts with the objective of a compact urban form. Regulatory instruments and urban design guidelines that recognise climate change as an urgent priority are both required to achieve the desired changes to land use. Toi Te Ora believe that voluntary measures will not achieve the scale and urgency of change that is required.
3. It is recommended that Council incorporate ‘sponge city’ concepts in urban planning and infrastructure development. ‘Sponge cities’ incorporate an extensive amount of absorptive infrastructure, such as wetlands, parks, vegetation, lakes, and permeable surfaces. ‘Sponge cities’ protect communities from flooding during extreme rainfall events.[[11]](#footnote-11) ’Sponge cities‘ provide other relevant benefits to the community such as increased green spaces and connection to nature and reducing heat island effects.
4. Toi Te Ora also recommends that Council creates a strategic plan for how Council will approach managed retreat. Due to the proximity of Tauranga to the coastline and the extensive low-lying areas, coastal inundation and storm surges are significant risks for Council. Current government planning by Ministry for the Environment will provide vital guidance and support for local government in decision-making surrounding managed retreat.[[12]](#footnote-12) However, this legislation is unlikely to be enacted within the timeframe required for Council to begin work on this issue.
5. Toi Te Ora recommends working alongside iwi and hapū to develop plans to address the risk of marae displacement due to managed retreat and extreme weather events. Displacement of and damage to marae will have significant impacts on hauora with impacts on the ability to undertake cultural practices and customary rights, and direct impacts on social, physical and spiritual wellness. Consideration of where marae will shift to and how this will impact iwi and hapū is essential, as there is a risk of generational harm, due to displacement through colonisation practices, being compounded.

Comments on specific actions:

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| L9 and 13 | Toi Te Ora recommends prioritising the Council infrastructure resilience programme and investigating wastewater treatment plant sites to detail specific climate risks to prepare adaption plans. |
| L2 and 3 | Toi Te Ora recommends greater action in terms of regulatory guidelines to allow for sufficient changes in urban density. Toi Te Ora believe voluntary guidelines and awareness will be insufficient to achieve the outcomes on page 30, or the goals of the document, and the Council’s vision for the city. |
| L1 | Toi Te Ora supports the objectives set out in L1, but due to the SmartGrowth strategy currently under consultation some SmartGrowth objectives are inconsistent with achieving a more compact urban form described in L1. Toi Te Ora recommend Council work closely with Western Bay of Plenty District Council in land use planning to effectively achieve the AIP. |

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| L17 | Toi Te Ora supports the further development of the Western Corridor. However, we recommend prioritising active and public transport along these routes. Importantly, developing alternative routes that prioritise single user commuters will undermine this action. |
| L5 | Toi Te Ora recommends creating actions that aim to provide detailed planning of managed retreat, and implementation of innovative strategies such as ‘sponge cities’ |

**People and Communities – Oranga Tāngata**

1. Toi Te Ora and Council have shared goals to support empowerment of communities and build healthy environments that promote health and wellbeing.[[13]](#footnote-13) Toi Te Ora supports the linkage between the AIP and Te Pae Tata in the people and communities section. As noted, climate change is a significant risk to human health, however, mitigation measures present an opportunity for health gains if health and equity are centred.
2. Toi Te Ora is concerned that not all of the proposed actions reflect the desired outcomes detailed in the people and communities stream of the AIP. Many of the actions (notably PC6, 8 and 9) require additional detail to understand how they will contribute to the desired outcomes.
3. Toi Te Ora recommends that Council review best practice guidelines for climate change communications to ensure that the goals, urgency and significance of the actions in the AIP are clearly understood by residents.

Comments on specific actions:

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| PC1 | Toi Te Ora supports undertaking climate risk and impact assessments. The assessments must be completed in partnership with iwi, hapū and other communities to ensure they are relevant to the impacts, priorities and rights of each group. |
| PC5 | Toi Te Ora recommends the broadening of the community grant fund includes a requirement that climate considerations are included in all types of fund applications. For example, information on how the project meets sustainability criteria and expected influence on climate change is required for fund applications. Additionally, Toi Te Ora recommends prioritising approving climate focused and pro-equity initiatives for Māori, Pasifika and low socioeconomic communities. |
| PC2 | Toi Te Ora recommends adding the following additional community events and programmes, with ongoing scoping for further opportunities recommended, particularly iwi and hapū led initiatives:   * Sustainable Backyards hub events * Backyard garden programmes * Initiating and/or supporting community-based tools or toy libraries |
| PC3 | Toi Te Ora are listed as collaborators for achieving behaviour change and communication programmes, however the linkage between Toi Te Ora and the action is not clear. Toi Te Ora welcomes discussion with our service to facilitate development of this area of work. |
| PC4 | Toi Te Ora recommends that Council ensure there is meaningful partnership with mana whenua and Māori communities, and organisations to enable shared decision making and communication to communities. |
| PC6,8 and 9 | Toi Te Ora recommends further developing these priorities to have clear actions. Reducing vulnerability to climate threats and strengthening adaptive capacity is essential, but more detail is required to understand how this will be achieved.  Toi Te Ora recommends that adaptation planning specifically includes development of preparedness plans for extreme weather events, such as flooding and heatwaves. Toi Te Ora welcomes the opportunity to work alongside Council to develop these plans. |
| PC10 | Toi Te Ora supports transitioning empowerment schemes toward strengthening adaptive capacity. Toi Te Ora recommends ensuring these schemes are designed to achieve equitable social and health outcomes in the community. |
| PC11 | Toi Te Ora are supportive of a priority action to collaborate with Te Whatu Ora to ensure a Health in All Policies approach. It is recommended that to progress this action point Council engage with Toi Te Ora to understand how this partnership can be developed.  There are significant potential co-benefits with well-planned climate mitigation strategies. Toi Te Ora recommend that Health in All Policies is considered as an overarching principle for Council strategy and planning in order to maximise the co-benefits. |
| PC “NEW” | Toi Te Ora supports funding the implementation of Mana Kai Mana Ora Western Bay of Plenty Food Sovereignty and Food Security Plan. However, detail on the nature and extent of the funding is needed to facilitate developing accessible and sustainable local food systems.  Toi Te Ora recommends supporting sustained funding for a programme coordinator and broadening the scope to include:   * Backyard gardens * Enabling community projects through supportive policy and programmes e.g. mentoring, ongoing support * Collaboration with stakeholders e.g. Toi Te Ora, Envirohub * Connected communications e.g. through the Mana Kai Mana Ora website. |

**Business - Whairawa**

1. Toi Te Ora supports Council actions that promote a circular economy and enable a just-transition for local businesses to move to a low carbon economy.
2. Toi Te Ora recommends generating more actions to meet the expected outcomes.
3. Investment to support the climate resilience of primary food industries across the region will be of benefit to local businesses and will help to address food security risks associated with climate change. Toi Te Ora recommends connecting to the Mana Kai Mana Ora (WBOP and Sovereignty and Security Plan) to ensure investment into a whole of system approach which is inclusive of local food sovereignty and security.

**Natural Environment – Oranga Taiao**

1. Given the multiple health benefits from contact with nature, Toi Te Ora is supportive of all actions in this section of the plan.
2. In the context of climate change, the potential for vegetation to mitigate the urban heat island effect and decrease heat stress is of particular significance to human health.
3. The majority of actions within this stream are already set out in the Nature and Biodiversity Action and Investment Plan. Toi Te Ora will not comment further on these. However, it is recommended that the scope of actions E2 and E5 be expanded to increase the potential Public Health benefits.

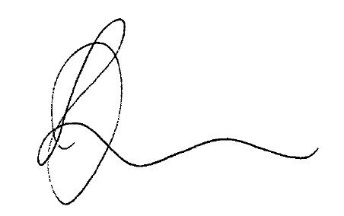
Comments on specific actions:

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| E5 | Toi Te Ora recommends Council further extends and develops the actions in this section. We recommend that Council partners with Western Bay of Plenty District Council in addition to Bay of Plenty Regional Council, to integrate actions across the wider Bay of Plenty.  It is unclear whether E5 is intended to include “green” as well as “blue” carbon. Toi Te Ora supports actions that enhance both of these natural sinks.  It is recommended that enhancement of blue and green carbon sinks are undertaken with resident wellbeing in mind. 'Natural sinks’ can provide access to both “blue” and “green” natural areas. Enhancement of these areas also have the potential to achieve goals under the Biodiversity Action and Investment Plan, such as reducing urban heat island effects. |
| E2 | Action E2is also supported. Natural features (e.g., parks, lakes, wetlands) in urban areas can make a vital contribution in adaptation to climate change. It is recommended that Council extend the scope of Natural Environment actions (including E2) to include “sponge city” principles as a tool to reduce the risk of flash flooding and increase greenspace.11 |

Thank you for the opportunity to provide feedback to the draft climate change action and investment plan.

Toi Te Ora is available to answer any questions or clarify any point raised in this feedback. Please phone Eliot Fenton (Health Improvement and Policy Advisor – 027 738 6570).

Yours sincerely

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**Public Health Physician**

cc: Jeremy Boase

Strategy & Corporate Planning

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1. Atwoli L, Baqui A H, Benfield T, Bosurgi R, Godlee F, Hancocks S et al. Call for emergency action to limit global temperature increases, restore biodiversity, and protect health BMJ 2021; 374 :n1734 doi:10.1136/bmj.n1734 [↑](#footnote-ref-1)
2. Bennett H, Jones R, Keating G, Woodward A, Hales S, Metcalfe S. Health and equity impacts of climate change in Aotearoa-New Zealand, and health gains from climate action. Migration. 2014;3:12-6. [↑](#footnote-ref-2)
3. New Zealand College of Public Health Medicine. NZCPHM Policy Statement on Climate Change. 2018 update-provisos. Wellington: New Zealand College of Public Health Medicine, 2018. [↑](#footnote-ref-3)
4. Jones R. Climate change and Indigenous health promotion. Global health promotion. 2019 Apr;26(3\_suppl):73-81. [↑](#footnote-ref-4)
5. Jones R, Bennett H, Keating G, Blaiklock A. Climate change and the right to health for Maori in Aotearoa/New Zealand. Health & Hum. Rts. J.. 2014;16:54. [↑](#footnote-ref-5)
6. Durie (1998); M. Durie, “Te Pae Mahutonga: a model for Māori health promotion” (Health Promotion Forum of New Zealand newsletter 49, 1999). [↑](#footnote-ref-6)
7. Kuschel *et al* (2022). *Health and air pollution in New Zealand 2016 (HAPINZ 3.0): Volume 1 – Finding and implications.* Report prepared by G Kuschel, J Metcalfe, S Sridhar, P Davy, K Hastings, K Mason, T Denne, J Berentson-Shaw, S Bell, S Hales, J Atkinson and A Woodward for Ministry for the Environment, Ministry of Health, Te Manatū Waka Ministry of Transport and Waka Kotahi NZ Transport Agency, March 2022. [↑](#footnote-ref-7)
8. Land Air Water Aotearoa. (2021, December 8). *Factsheet: Monitoring air quality in New Zealand*. Retrieved from Land Air Water Aotearoa: https://www.lawa.org.nz/learn/factsheets/air-quality-topic/monitoring-air-quality-in-new-zealand/#:~:text=Exceedances%20of%20air%20quality%20standards%20%E2%80%93%20PM&text=The%20NES%2DAQ%20daily%20average,m3%20are%20called%20exceedances. [↑](#footnote-ref-8)
9. World Health Organization. (2021). *WHO global air quality guidelines. Particular matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur disoxide and carbon monoxide.* Geneva: World Health Organization. [↑](#footnote-ref-9)
10. European Conference of Ministers of Transport. Managing urban traffic congestion. OECD and Transport Research Centre, 2007. (https://www.oecd-ilibrary.org/transport/managing-urban-traffic-congestion\_9789282101506-en). [↑](#footnote-ref-10)
11. World Economic Forum. (2022, March 30). *Climate change: What are 'sponge cities' and how can they prevent floods*. Retrieved from World Economic Forum: https://www.weforum.org/agenda/2022/03/sponge-cities-nature-tackle-climate-floods-urban?DAG=3&gclid=EAIaIQobChMIm6CxlbCj\_wIV7YBLBR1jiAn7EAAYAiAAEgK9XvD\_BwE [↑](#footnote-ref-11)
12. Ministry for the Environment. (2022, August 02). *Adapting to climate change: Managed retreat: what is it and when it might be useful* . Retrieved from Ministry for the environment: https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/adapting-to-climate-change/managed-retreat/ [↑](#footnote-ref-12)
13. Te Whatu Ora, Te Aka Whai Ora. Te Pae Tata - Interim New Zealand Health Plan. 2022. [↑](#footnote-ref-13)