

19 May 2026

Kapiti Coast District Council  
175 Rimu Road  
Paraparaumu 5254

## **Submission by Kapiti CALM – Draft Emissions Reduction Plan 2026-30**

### **Executive Summary**

Kapiti CALM objects to the inclusion of the proposed Emissions Reduction Strategy Plan (ERSP) in its entirety and specifically within the Long-Term Plan (LTP 2027) in its current form.

Our concerns relate primarily to:

- the heavy reliance on long-term modelling assumptions and aspirational emissions scenarios,
- insufficient disclosure of uncertainty and financial risk,
- limited evidence of measurable local benefit,
- inadequate cost-benefit transparency,
- and the expanding scope of climate-related policy beyond the Council's core infrastructure and service delivery functions.

CALM supports practical, evidence-based environmental initiatives that deliver clear and measurable local outcomes for residents and ratepayers, including:

- infrastructure resilience,
- stormwater reliability,
- waste minimisation,
- clean waterways,
- emergency preparedness,
- and operational efficiency improvements.

However, we submit that long-term emissions reduction strategies involving uncertain modelling assumptions, significant future expenditure, and behavioural-change programmes require:

- stronger democratic scrutiny,
- clearer evidential thresholds,
- independent financial analysis,
- and greater transparency regarding affordability and long-term ratepayer impacts.

The ERSP proposes substantial long-term commitments at a time when many Kapiti households are already facing:

- rising rates,
- increasing insurance costs,
- higher living expenses,
- and broader affordability pressures.

CALM therefore requests that Council:

- Reconsider the inclusion of the ERSP within the LTP.
- prioritise measurable local resilience outcomes over aspirational emissions targets,
- provide fuller disclosure of modelling assumptions and financial implications,
- and ensure future climate-related initiatives are proportionate, evidence-based, fiscally sustainable, and clearly aligned with the Council’s core statutory responsibilities.

## Who We Are

Kapiti CALM (Calm Alarmist Law Madness) was formed in 2023 by Kapiti residents and ratepayers in response to concerns surrounding climate-related planning processes within the district, including the Climate Adaptation Plan (CAP) process and associated technical work.

We are a community advocacy and awareness group focused on:

- evidence-based policy,
- transparent public consultation,
- fiscal responsibility,
- democratic accountability,
- and careful evaluation of long-term modelling assumptions used in local government decision-making.

Our submission focuses on:

- the distinction between measured local environmental data and long-range modelling assumptions,
- transparency regarding uncertainty and cost,
- prioritisation of measurable local outcomes,
- affordability and intergenerational financial impacts,
- and ensuring that climate-related initiatives remain proportionate to the Council’s statutory functions and financial responsibilities.

## 1. Reliance on Long-Term Emissions Modelling and “Net Zero by 2040”

The ERSP repeatedly refers to:

- an aspirational “net zero by 2040” target,
- emissions modelling aligned with the Climate Change Commission’s demonstration pathway,
- and future reductions dependent on technological uptake and behavioural change.

CALM acknowledges that long-term emissions modelling is widely used in policy development. However, such modelling necessarily relies on assumptions regarding:

- future energy systems,
- electrification rates,
- consumer behaviour,
- economic conditions,
- technological advancement,
- and future national policy settings.

These variables remain inherently uncertain over multi-decade timeframes.

CALM therefore submits that:

- modelling assumptions should be clearly disclosed,
- uncertainty ranges should be transparently communicated,
- and aspirational scenarios should not be presented as settled or inevitable outcomes.

The ERSP notes that district emissions reduced by approximately 6% over five years. By comparison, achieving a net-zero target by 2040 would require substantially larger, sustained annual reductions over a prolonged period.

CALM requests that Council provide:

- detailed modelling assumptions underpinning the 2040 target,
- estimated cumulative costs,
- projected ratepayer impacts,
- anticipated debt implications,
- and measurable local benefits expected from district-level emissions reductions.

CALM is particularly concerned that long-term emissions commitments may create:

- escalating future infrastructure costs,
- increased borrowing requirements,
- pressure for additional rate increases,
- and reduced financial flexibility for core infrastructure obligations.

In the current economic environment, many Kapiti households are already experiencing:

- significant rate increases,
- rising insurance costs,
- higher interest rates,
- increased energy and living costs,
- and broader affordability pressures.

CALM submits that any discretionary climate-related expenditure should therefore be subject to an especially high threshold of financial scrutiny and demonstrable local benefit.

## **1(a) Use of Emissions Scenarios**

The ERSP references modelling frameworks that include high-emissions pathways such as SSP5-8.5.

CALM notes that international scientific literature increasingly distinguishes between:

- high-end stress-test scenarios,
- and scenarios considered more likely under current global policy and energy trends.

There is now a substantial international debate about the extent to which extreme emissions scenarios should be used in local government planning and policy development, particularly when such scenarios materially influence long-term infrastructure or financial decisions.

CALM therefore requests that Council:

- clearly identify which emissions scenarios underpin the ERSP,
- explain why those scenarios were selected,
- disclose associated uncertainty ranges,
- quantify the financial implications associated with each scenario,
- and provide justification for using any high-end scenarios in district-level planning.

Where high-cost policy interventions are proposed, the Council should demonstrate:

- proportionality,
- measurable local benefit,
- and reasonable confidence in the assumptions underpinning those expenditures.

## **1(b) Local Data and Observed Environmental Trends**

CALM submits that local planning should place greater emphasis on measured local observations alongside long-term modelling projections.

Examples of relevant local factors include:

- historical shoreline behaviour,
- vertical land movement associated with tectonic activity,
- storm frequency records,
- locally measured environmental data,
- and long-term infrastructure performance observations.

CALM requests that Council:

- publish comparisons between projected outcomes and observed outcomes where possible,
- identify where local observations differ from broader regional assumptions,
- and ensure that uncertainty associated with local-scale projections are clearly communicated to the public.

CALM is not suggesting that broader climate science be disregarded. Rather, local policy should clearly distinguish between:

- measured local conditions,
- modelled future scenarios,
- and assumptions requiring significant long-term forecasting.

### **1(c) Sequestration Accounting**

The ERSP acknowledges uncertainty surrounding sequestration estimates, including:

- changing forestry absorption rates,
- limitations in available forestry data,
- and monitoring methodologies still under development.

CALM requests that Council provide:

- independently verifiable sequestration methodologies,
- Explanation of confidence levels associated with estimated offsets,
- and clarification regarding the extent to which emissions reductions rely on offset assumptions rather than direct reductions.

CALM supports:

- conservative accounting methodologies,
- transparent reporting standards,
- and independent auditing of emissions and sequestration estimates used in policymaking.

Where sequestration assumptions materially influence long-term spending decisions, CALM submits that:

- Financial risks associated with inaccurate assumptions should be clearly identified.
- Contingency planning should be disclosed.
- And ratepayer exposure to future liabilities should be quantified.

## **2. Community Engagement and Democratic Mandate**

Council has stated that consultation demonstrated strong support for the ERSP.

However, CALM notes that publicly available consultation information appears limited regarding:

- demographic representation,
- age distribution,
- participant's understanding of financial implications,
- and whether alternative viewpoints and uncertainties were adequately presented.

Given the potentially significant long-term financial implications associated with emissions reduction initiatives, CALM submits that:

- Consultation processes should provide balanced information,
- uncertainties and trade-offs should be explicitly disclosed,
- residents should be provided with clear information regarding projected costs, benefits, and expected measurable outcomes,
- and cumulative financial impacts over multiple LTP cycles should be clearly explained.

CALM is concerned that much of the public communication surrounding climate initiatives has focused primarily on advocacy and aspirational outcomes, with comparatively limited discussion of:

- modelling uncertainty,
- economic trade-offs,
- affordability pressures,
- debt implications,
- or the practical limits of local government influence over global emissions outcomes.

### **3. Core Council Functions and Scope**

The ERSP includes initiatives that extend beyond operational efficiency and infrastructure management into areas related to private household behaviour and consumer decisions.

Examples include:

- transport choices,
- household energy use,
- appliance uptake,
- and behavioural-change programmes.

CALM submits that the Council's primary role should remain focused on:

- delivery of core infrastructure and services,
- resilience planning,
- water and wastewater infrastructure,
- transport reliability,
- stormwater management,
- waste minimisation,
- and environmental management directly within the Council's operational mandate.

Where Council proposes behavioural or lifestyle-focused initiatives, CALM requests:

- clear evidence of measurable effectiveness,
- quantified cost-benefit analysis,
- evidence that benefits exceed administrative costs,
- and explicit justification for ratepayer funding of such programmes.

CALM is concerned that expansion into discretionary climate programmes risks diverting limited financial resources away from core infrastructure obligations at a time when many councils throughout New Zealand are already facing:

- infrastructure funding deficits,
- increasing debt servicing costs,
- ageing assets,
- and rising maintenance backlogs.

#### **4. Cost-Benefit Transparency and Financial Accountability**

The ERSP refers to broad or indirect benefits associated with several initiatives, including:

- walking and cycling infrastructure,
- EV charging expansion,
- and sequestration projects.

CALM requests that Council provide:

- full cost-benefit analysis for major emissions-related initiatives,
- projected cumulative ratepayer costs,
- measurable emissions reductions per dollar spent,
- expected operational savings where applicable,
- lifecycle maintenance and renewal costs,
- borrowing requirements,
- and prioritisation criteria for funding decisions.

CALM further requests:

- separation of mandatory infrastructure expenditure from discretionary climate initiatives,
- annual public reporting comparing projected outcomes against actual outcomes,
- stronger democratic oversight regarding future climate-related expenditure,
- and disclosure of total long-term financial exposure associated with ERSP implementation.

Where projects are justified based on future avoided costs or projected emissions reductions, CALM requests that:

- assumptions be independently reviewed,
- discount rates and modelling methodologies be disclosed,
- and sensitivity testing be undertaken to demonstrate how outcomes change under different assumptions.

## 5. Prioritising Measurable Local Resilience Outcomes

CALM supports practical initiatives that provide demonstrable local benefits, including:

- infrastructure resilience,
- stormwater reliability,
- emergency preparedness,
- transport network resilience,
- waste minimisation,
- energy reliability,
- and environmental management with measurable local outcomes.

These outcomes are generally:

- easier to quantify,
- easier to evaluate,
- more directly connected to the Council's statutory responsibilities,
- and more financially accountable than long-term aspirational emissions targets.

CALM submits that, in a district facing significant affordability pressures and rising rates, discretionary climate initiatives should meet a high evidential threshold demonstrating:

- measurable local benefit,
- proportionality of cost,
- affordability,
- fiscal sustainability,
- and clear alignment with the Council's core functions.

Priority should be given to initiatives delivering:

- measurable resilience improvements,
- operational savings,
- infrastructure reliability,
- and direct community benefit within reasonable and transparent financial parameters.

### Summary

Kapiti CALM objects to the inclusion of the ERSP in its entirety and within the Long-Term Plan in its current form.

Our concerns relate not to environmental stewardship itself, but to:

- evidential standards,
- modelling transparency,
- affordability,
- democratic mandate,
- fiscal sustainability,
- and the proportionality of long-term emissions policy within local government decision-making.

CALM supports practical, evidence-based environmental initiatives, including:

- waste reduction,
- recycling and reuse programmes,
- clean waterways,
- drinking water protection,
- beach and public-space clean-up initiatives,
- and infrastructure resilience measures, which deliver measurable local benefits.

Kapiti CALM submits that long-term emissions strategies involving uncertain modelling assumptions, aspirational targets, and potentially significant future expenditure should be subject to:

- robust public scrutiny,
- transparent cost-benefit analysis,
- independent financial review,
- clear disclosure of uncertainty,
- and stronger evidential thresholds before being incorporated into binding long-term financial planning documents.

In a district already experiencing significant affordability pressures and ongoing rate increases, Council should ensure that discretionary climate-related expenditure does not compromise:

- core infrastructure delivery,
- long-term financial resilience,
- intergenerational affordability,
- or the ability of residents — particularly retirees, low-income households, and working families — to remain within the district.

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