Nelson Tasman Climate Forum

Submission on Natural Environment and Planning Bills

Prepared by NTCF Submissions Group

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Introduction

1. We thank the Environment Select Committee for the opportunity to make a submission on the Natural Environment Bill and Planning Bill.

2. The Nelson Tasman Climate Forum (NTCF) is a community-led climate action initiative. We aim to weave the community together around urgent, strategic action to achieve the following goals:
   - rapidly reduce the region's greenhouse gas emissions, increase carbon sequestration and undertake other climate stabilising initiatives, consistent with the urgency of the situation
   - adapt to the likely adverse environmental effects of climate change and the resulting social and cultural effects, using inclusive and responsible decision-making to support these desirable outcomes
   - respond to climate change in a way that recognises the rights of all living organisms, including people, and provides for a just, equitable, and resilient society.

3. We acknowledge the kaitiaki status of local iwi as Manawhenua, tangata whenua of this rohe.

4. *Please note*: whilst the Nelson City Council and Tasman District Council have both signed the Nelson Tasman Climate Forum Charter, this submission has been prepared completely independently of the Councils. This submission is in no way intended and nor should be construed to represent the views of either Council in any way.

Summary

5. Climate change is largely overlooked in the two Bills. This will add considerable risks and costs to Aotearoa New Zealand. In our submission we show the strategic benefits of including GHG reduction and climate adaptations in the goals of this legislation. As with other regions, Nelson Tasman is already paying the high price of extreme weather. Our farmers face new risks in what to grow while many New Zealanders are worried about the impact of climate related weather events on their homes.[1]

6. We make recommendations to add climate mitigation and climate adaption and supporting climate resilient development to the Goals (Section 11) of the two Bills.

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[1] Tower 2025. Weathering change: attitudes to climate risk and resilience in New Zealand.

Climate change and its potentially profound consequences

7. 2023, 2024 and 2025 were the three hottest years on record, 1.45 °C, 1.55 °C and 1.44 °C above pre-industrial levels.[2] These increases are higher than previously predicted. Analysis of these recent warming trends, together with a sharp, sustained upward trend of Earth's energy imbalance, evidence that ocean and land-based natural carbon sinks are degrading, and evidence from paleoclimate records indicate the IPCC's models have underestimated the Earth's climate sensitivity.[3] These findings all point in the same direction: to the risk that the real climate response to emissions is towards the high end of previously accepted ranges.

8. Global warming in the next two decades is now predicted to be about 0.2-0.3 °C per decade, leading to global temperature of +2 °C by 2045–2050, unless action is taken to change course. [4] Net zero carbon budgets will not be even close to limiting the temperature to 1.5 °C. Higher sensitivity means more warming for any given level of emissions, and faster approach to dangerous temperature thresholds.

9. This poses a high level of under-appreciated risk for many of the concerns the two Bills seek to address, notably the economic.

10. Analysis by the UK Institute and Faculty of Actuaries and University of Exeter ('Actuaries Study')[5] shows the potential for GDP damages to increase significantly as temperatures increase, leading to a 50% drop in GDP later in the century.

11. Their analysis contrasts with most other economic assessments. 'Many high-profile, public climate change risk assessments are significantly underestimating risk because they exclude many of the real-world impacts of climate change, such as the impact of tipping points, extreme events, migration, sea level rise, human health impacts or geopolitical risk. They calculate ongoing economic growth, even in a hothouse world, as climate damages are lower than growth assumptions. These results conflict with scientific predictions of significantly reduced human habitability from climate change.' [6]

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[2] WMO 2026. WMO confirms 2025 was one of warmest years on record.
[3] Trust, S. et al. 2026. Parasol lost: recovery plan needed. Global risk management for human prosperity; Hansen, J.E. et al. 2025. Global warming has accelerated: are the United Nations and the public well-informed?
[4] Ibid.
[5] Trust, S. et al. 2026. Parasol lost: recovery plan needed. Global risk management for human prosperity.
[6] Ibid.

12. Significant in weighing up investment in climate mitigation vis-à-vis adaptation, one widely quoted study of the latter kind found that annual global economic damages from climate change in the middle of this century are about five times higher than the abatement and adaptation costs associated with limiting global warming to 2°C.[7] In other words, the economic case for addressing climate change is overwhelming even before considering the impacts now addressed in the Actuaries Study.

13. In this light, we seriously question whether the Treasury's Climate economic and fiscal assessment 2023[8] is a sound basis for considering the economic and other damages of climate change in Aotearoa New Zealand into the future.

14. Rather, we conclude, if we stay on our current course, that there will be potentially profound damaging consequences for Aotearoa New Zealand's economy, environment, and society, alongside those for the wider humanity.

Climate change and the Natural Environment Bill and Planning Bill

15. Notwithstanding the profound potential consequences of climate change (as described above) across the suite of goals specified in Section 11 of the Planning Bill and Section 11 of the Natural Environment Bill, consideration of climate change is conspicuous for its almost complete absence in the two Bills.

16. Specific consideration is confined to:
    i. inclusion of the effects of climate change in the definition of natural hazard, and thereby in the corresponding Goals of the Planning Bill (Section 11 (h) and of the Natural Environment Bill (Section 11 (e))
    ii. reference to the national adaptation plan under the Climate Change Response Act 2002 on four occasions in the Planning Bill, and twice in the Natural Environment Bill
    iii. priority locations for adaptation plans prepared under the Climate Change Response Act 2002 are a mandatory matter for regional spatial plans (Planning Bill, Schedule 2).

17. Yet the Bills will influence where and how we develop land for housing and other purposes, and many other climate-impacting activities, along with opportunities for nature-based solutions to the climate crisis and extreme weather events. Decisions made today will lock in outcomes over the next 30+ years. That is not forward-thinking, it is planning to create a deferred liability.

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[7] Kotz, M., A. Levermann & L. Wenz 2024. The economic commitment of climate change.
NB. At time of writing, retracted for correction, scope described at Major study on catastrophic cost of climate change retracted - but revised figures remain alarming. Figure quoted here is based on expected correction.

[8] The Treasury 2023. Ngā kōrero ahuarangi me te Ōhanga: Climate economic and fiscal assessment 2023

18. For example:
    i. infrastructure built without climate adaptation will fail prematurely (coastal roads, drainage systems, buildings in flood zones necessitating costly relocation)
    ii. ignoring emissions in planning decisions locks in high-carbon development patterns for decades [9]
    iii. climate risks are financial risks - investors and insurers are pricing this in.

19. The Bills do not integrate with our Paris Agreement commitments including the 2050 target or Emissions Reduction Plans. This creates regulatory incoherence - one law sets climate targets, another enables development without reference to them.

20. How then can we credibly plan infrastructure corridors, growth areas, and hazard zones for 2055, without explicit climate risk assessment requirements?

21. National instruments are subordinate to the Bills' purposes. If climate isn't in the purpose, national instruments can't mandate consideration of it.

Conclusions and Recommendations

22. New Zealand cannot achieve genuine economic growth or infrastructure resilience without integrating climate mitigation and adaptation into the foundational purpose of our planning system.

23. Addressing climate mitigation (including sequestration) and climate adaptation needs to be explicitly brought into the Goals (Section 11) and other provisions of both Bills, rather than treating these as an afterthought. Without this, the whole architecture of the Bills will be unable to require decision-makers to consider NZ's emissions budgets and climate adaptation requirements when making planning decisions.

24. To enable consideration of the full scope of climate change and its potential profound impacts across all concerns that the Bills seek to address, we recommend to the Select Committee to study the Planetary Solvency framework of the UK Institute and Faculty of Actuaries. [10]

25. We thank you for your consideration of our contribution.

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[9] Neubauer, T. 2024. Don't sweat the small stuff when it comes to emissions savings.
[10] Trust, S. et al. 2025. Planetary Solvency – finding our balance with nature: global risk management for human prosperity.
Trust, S., et al. 2026. Parasol lost: recovery plan needed. Global risk management for human prosperity.

We recommend:

i. Adding to Section 11 of the Natural Environment Bill:

   Enable climate change mitigation and adaptation by:

   (a) Reducing greenhouse gas emissions from land use, development, and resource use
   (b) Building resilience to climate change impacts including sea-level rise, flooding, drought, and extreme weather
   (c) Aligning planning decisions with New Zealand's emissions budgets under the Climate Change Response Act 2002.

ii. Adding to Section 11 of the Planning Bill:

   Support climate-resilient development by:

   (a) directing growth and infrastructure away from areas of increasing climate risk
   (b) enabling low-emissions transport, energy, and urban form
   (c) Requiring climate risk assessment in spatial planning over multi-decade timeframes.