

**Audit, Finance & Risk Committee**

6 July 2023

**Report for Agenda Item | Rīpoata moto e Rāraki take [5]**

**Department: Strategy & Policy**

**Title | Taitara : Climate and Biodiversity Plan Update**

**Purpose of the Report | Te Take mō te Pūroko**

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The purpose of this report is to provide a summary of priorities and progress of the Climate and Biodiversity Plan 2022-2025 (CBP).

**Recommendation | Kā Tūtohuka**

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That Audit, Finance & Risk Committee:

1. **Note** the contents of this report.

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21 June 2023

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21 June 2023

Context | Horopaki

1. On 27 June 2019 Council declared a climate and ecological emergency as well as approving the release of the Council’s first [Climate Action Plan 2019-2022](#) for public feedback. This plan provided a foundation for Queenstown Lakes District Council’s (QLDC) response to the climate and ecological emergency by laying out a broad programme of actions that spanned across five outcome areas.
2. On 30 June 2022 the [Climate and Biodiversity Plan 2022-2025](#) was adopted by Council, along with an annual plan funding increase to support its year 1 delivery. This plan sets out how QLDC plans to respond to biodiversity loss and climate change in Queenstown Lakes District, with three goals and six outcomes (see Figure 1).

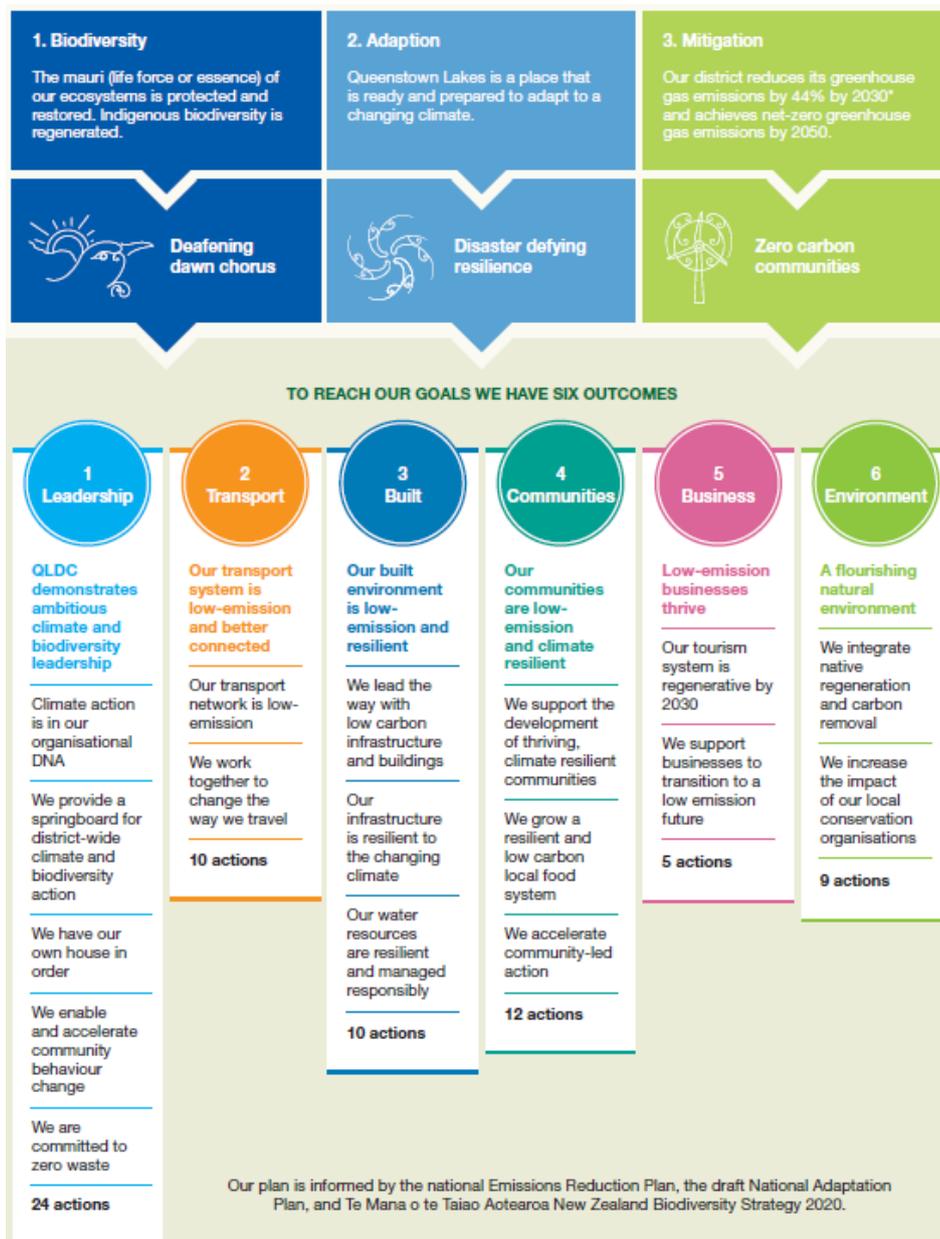


Figure 1: Climate & Biodiversity Plan Structure

Analysis and Advice | Tatāritaka me kā Tohutohu

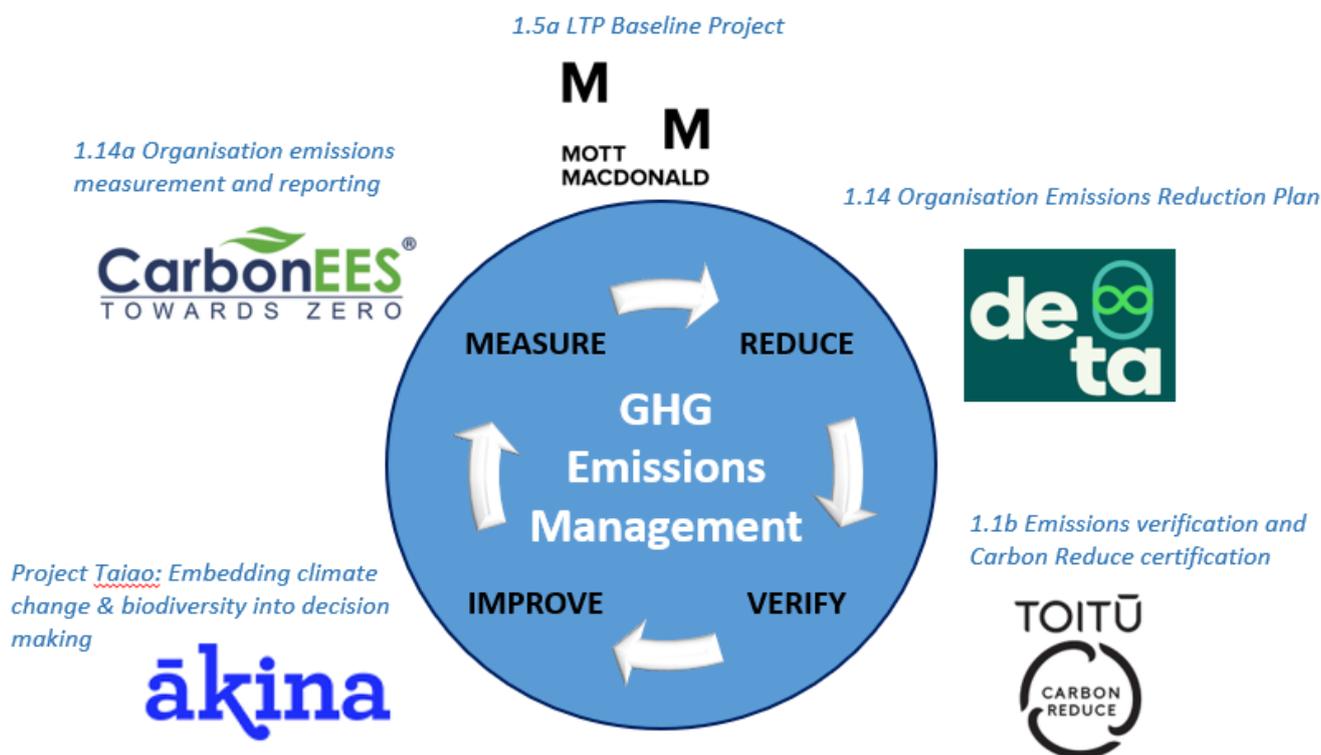
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**CLIMATE AND BIODIVERSITY PLAN 2022-2025: YEAR 1 OVERVIEW**

3. To reflect the urgency of the climate and ecological emergency, an ambitious schedule of **62 actions** were scheduled to commence in the first year (2022/23) of the Climate & Biodiversity Plan. Council's progress towards this target is as follows:
- **56 actions** have been started and are in progress.
  - **4 actions** are complete:
    - 1.5a Conduct a carbon baseline of the 2021-2031 Ten Year Plan.
    - 2.1e Support local organisations to run public transport trials in the Upper Clutha
    - 5.1 Partner with the Regional Tourism Operators to create a Destination Management Plan
    - 4.7 Launch a Queenstown Lakes Food Network that brings together community stakeholders to develop a shared vision of a resilient, low carbon and regenerative local food system.
  - **2 actions** have been delayed until year 2 (2023/24) due to resourcing or timing constraints:
    - 1.7 Develop a QLDC internship pathway for students to support their career progression into the field of sustainability, biodiversity, or climate action. [Delayed due to resourcing constraints].
    - 4.8 Develop a roadmap of initiatives and funding opportunities to accelerate and scale up community food system projects across the district. [Delayed so that it aligns with phase 2 of the Food Resilience Network project]
4. There are **3 actions** that were scheduled to start in year 2 but which have commenced early to capitalise on opportunities for partnered delivery. These are:
- 1.12- Partner with Otago Regional Council (ORC) on a programme of climate change risk assessments, adaptation plans and natural hazard risk assessment studies.
  - 2.9- Partner with businesses to deliver active travel and shared transport solutions and innovations: [Beam scooter launch]
  - 5.2 – Implement the actions outlined in the Destination Management Plan: [Funding and resourcing support provided for the development of the Queenstown Lakes Carbon Zero Discussion Paper]
5. The following sections provide updates on progress of key Year 1 actions for each of the six outcome area of the Climate & Biodiversity Plan.

**OUTCOME 1: QLDC DEMONSTRATES AMBITIOUS CLIMATE & BIODIVERSITY LEADERSHIP**

6. Outcome 1 involves the greatest number of actions (24) as well as the highest level of budgeted expenditure. This investment reflects the criticality of ensuring that QLDC has its house in order and has successfully embedded climate action and biodiversity restoration into the culture and decision-making processes of the organisation.
7. The execution of these organisational changes is a complicated challenge, and it has required several overlapping work programmes to be initiated concurrently. Although this presents a significant resourcing and programme management challenge, it has been a necessary undertaking to ensure that the required elements of an effective Green House Gas (GHG) emissions management framework are established and embedded within the organisation.
8. The below diagram illustrates the key elements of this GHG emissions management framework (Measure, Reduce, Verify, Improve) and the associated projects and contract partners who are leading the delivery.



**Figure 2: GHG Emissions Management Framework**

**Action 1.14a- Emissions measurement and reporting (MEASURE- operational emissions)**

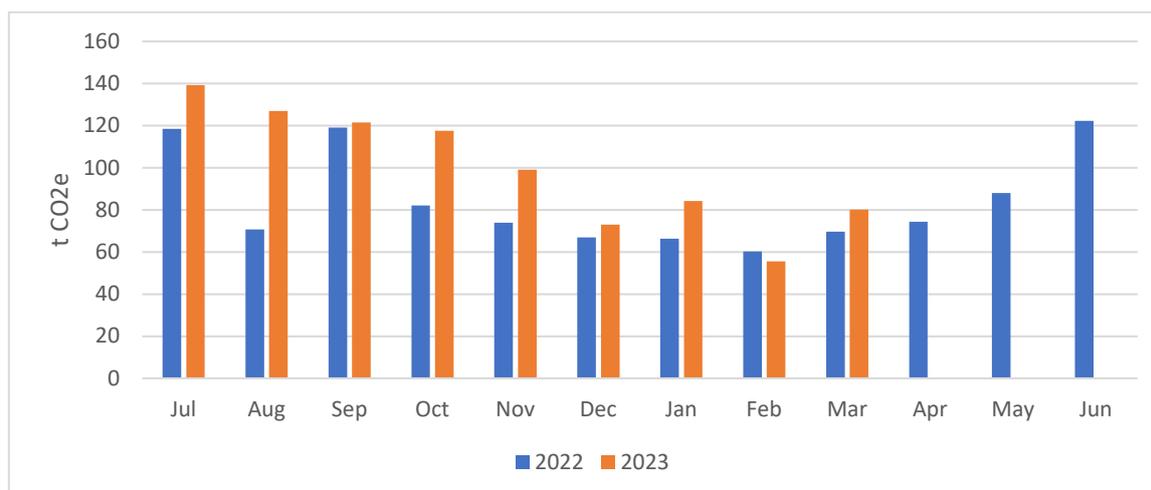
9. QLDC is working with CarbonEES to measure and report on the organisational GHG emissions for FY2019/20, FY2020/21 and FY2021/22.



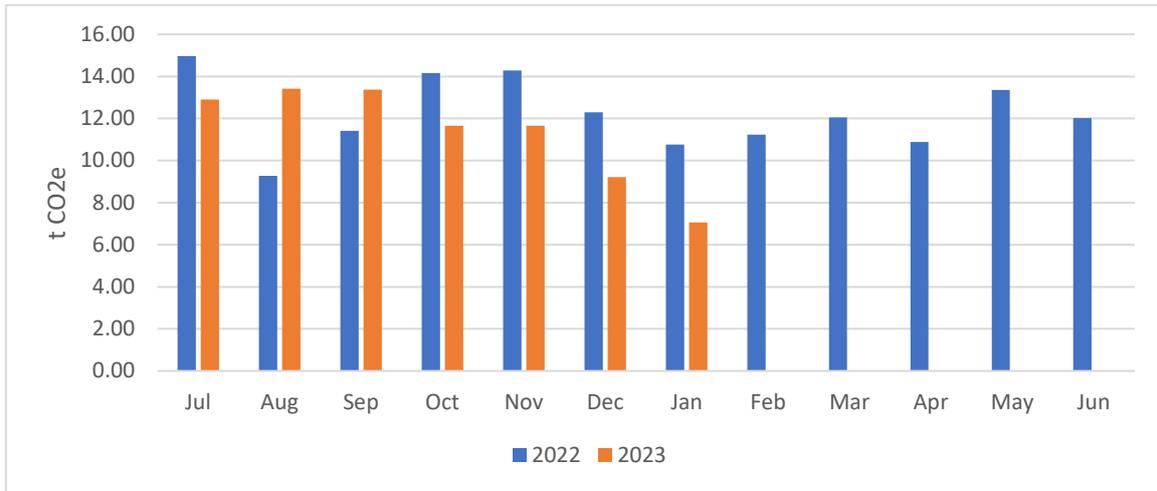
10. Emissions data reporting is managed through the CarbonEES e-Bench software platform. Council energy invoices are inputted automatically into the system and emissions factors are then applied. The resultant data can then be collated into annual reports as well as being graphed to show emissions trending results.

11. The below graphs illustrate the trending of Council’s Scope 1- LPG and transport fuels emissions, Scope 2- purchased electricity emissions and combined organisational emissions performance. These graphs reveal the following performance results for Council emissions:

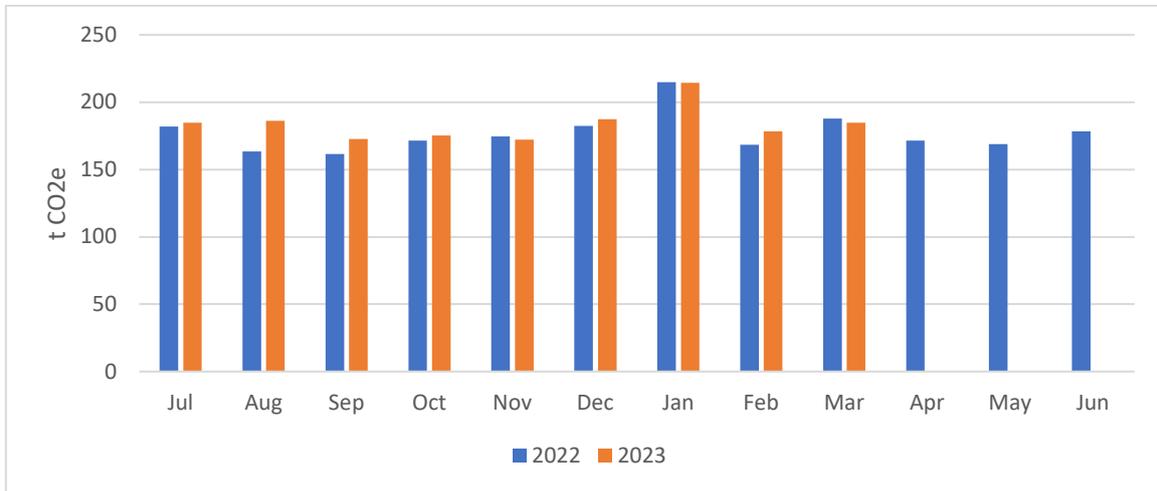
- The emissions from LPG consumption (figure 3) are trending higher in 2022/23 compared to previous year. There are significant increases in monthly usage for August, October and November, which is primarily due to the impacts of Covid-19 restrictions in 2021/22 which reduced LPG pool heating and space heating demand.
- There has been a net decrease in transport fuel emissions in 2022/23 (Figure 4). This decrease is attributed to the ongoing expansion of the EV fleet and is a positive result, even though it represents a smaller proportion of emissions compared to LPG and electricity.
- Electricity demand remains relatively consistent over the last two years (Figure 5).
- The combined scope 1 and scope 2 organisation emissions for 2022/23 are trending higher than 2021/22.



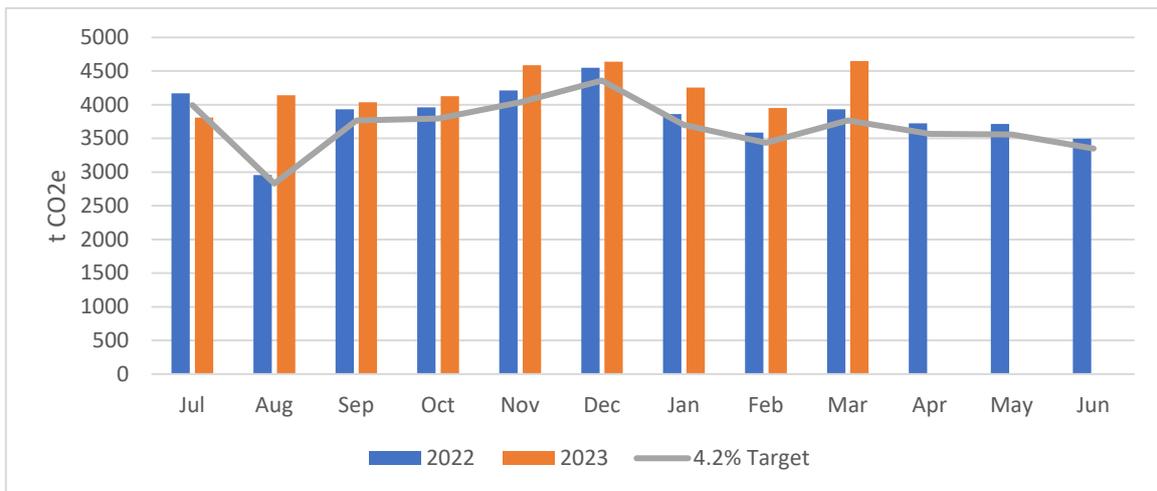
**Figure 3: Scope 1 Emissions- Liquefied petroleum gas stationary sources (e.g. space heating, pool heating)**



**Figure 4: Scope 1 Emissions- Transport fuels (petrol + diesel)**



**Figure 5: Scope 2 - Electricity**



**Figure 6: Combined Scope 1 & 2 Organisation Emissions**

**Action 1.5a: Long-Term Plan Carbon Baseline Report (MEAURE/REDUCE- embedded emissions)**

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12. In 2022 Mott MacDonald and Local Government New Zealand (LGNZ) Equip were engaged to undertake an assessment of the embedded carbon that was associated with the capital infrastructure programme within the 2021-2031 Long Term Plan (LTP). The purpose of this was to:



- Establish a baseline for projects to track against through design and construction, with a view to setting carbon reduction targets for designers and contractors.
- Provide decision-makers with an understanding of carbon hotspots, and the steps that will lead to reductions.
- Lift the organisational capability in embedded carbon accounting ahead of the 2024-2034 Long Term Plan.

13. To develop this baseline estimate, the project team have focussed on the 67 highest value physical projects in the LTP and modelled these using the Moata Carbon Portal (MCP). The results from this detailed analysis have then been extrapolating across all 329 projects within the 2021-2031 LTP to develop the overall embedded carbon baseline.

14. The draft LTP Carbon Baseline report has been completed and a technical review process completed. The final version is now under development and will be released early in the new financial year.

**Action 1.14: Organisation Emissions Reduction Plan (REDUCE- operational emissions)**

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15. The engineering consultancy DETA has been engaged to develop an Organisation Emissions Reduction Plan (ERP) which will evaluate the opportunities for scope 1 and scope 2 emissions reduction through to 2030.



16. DETA led the emissions modelling work for the [District Emissions Reduction Roadmap](#) in 2020, which included an analysis of Council's direct energy emissions reduction opportunities. The ERP is an extension to this work, which brings together the latest information on investment opportunities and pathway modelling.

17. The opportunities that are being investigated include: conversion of LPG heating at the swimming pools, building energy efficiency improvements, solar system installations, street lighting conversions, wastewater efficiency improvements, renewable energy certificates (RECs) and energy saving from improved water demand management.

18. The ERP is an important document to support the Toitū Carbon Reduce certification as well as any future application for Local Government Funding Agency (LGFA) [Climate Action Loans](#).

19. A draft of the ERP is under development and the final version will be available early in the new financial year.

#### **Action 1.1b: GHG emissions verification and carbon reduction certification**

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20. QLDC has committed to joining a certified carbon reduction programme to ensure that its emissions measurement and reduction programme can be audited by an accredited third-party agency.

21. The selected programme to fulfil this action is the Toitū Envirocare [Carbon Reduce certification](#).

22. The carbon reduce certification programme involves annual auditing of Council's GHG emissions against the ISO 14064-3:2019 standard, as well as verification of progress towards Council's emissions reduction targets. Through gaining the Carbon Reduce certification Council can demonstrate that its emissions reporting and emissions reduction progress has the credibility and assurance of the Joint Accreditation System of Australia and New Zealand (JAS-ANZ).

23. In May 2023 a team from Toitū audited the organisational GHG emissions reporting for FY2018/19 to establish a baseline year against which future years could be compared. 2018/19 was selected as it was prior to the disruption caused by the Covid-19 response.

24. To be eligible for Toitū Carbon Reduce certification an Emissions Reduction Plan (ERP) is required (action 1.14) that establishes clear reduction targets and pathways for achieving them. Importantly the reduction pathway does not need to be a linear annual regression. Emissions reduction targets are assessed over a 6-year period so annual fluctuations can be accepted as long as the targets are achieved within the 6-year reporting timeframe. QLDC has committed to providing the finalised ERP to Toitū at the next audit which is scheduled for September 2023.

#### **Project Taiao: Embedding climate action and biodiversity into Council decision making (IMPROVE)**

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25. Several actions within the Climate & Biodiversity plan are targeted at driving an improvement to the internal processes and decision-making frameworks of Council e.g. 1.2, 1.3, 1.5, 1.11, 1.15.

26. QLDC has engaged the Ākina Foundation to lead a project that bundles these actions together into an integrated work programme. This programme has been named **Project Taiao** and it is designed to embed climate action and biodiversity considerations into Council decision making.

27. Project Taiao involves the following three phases:

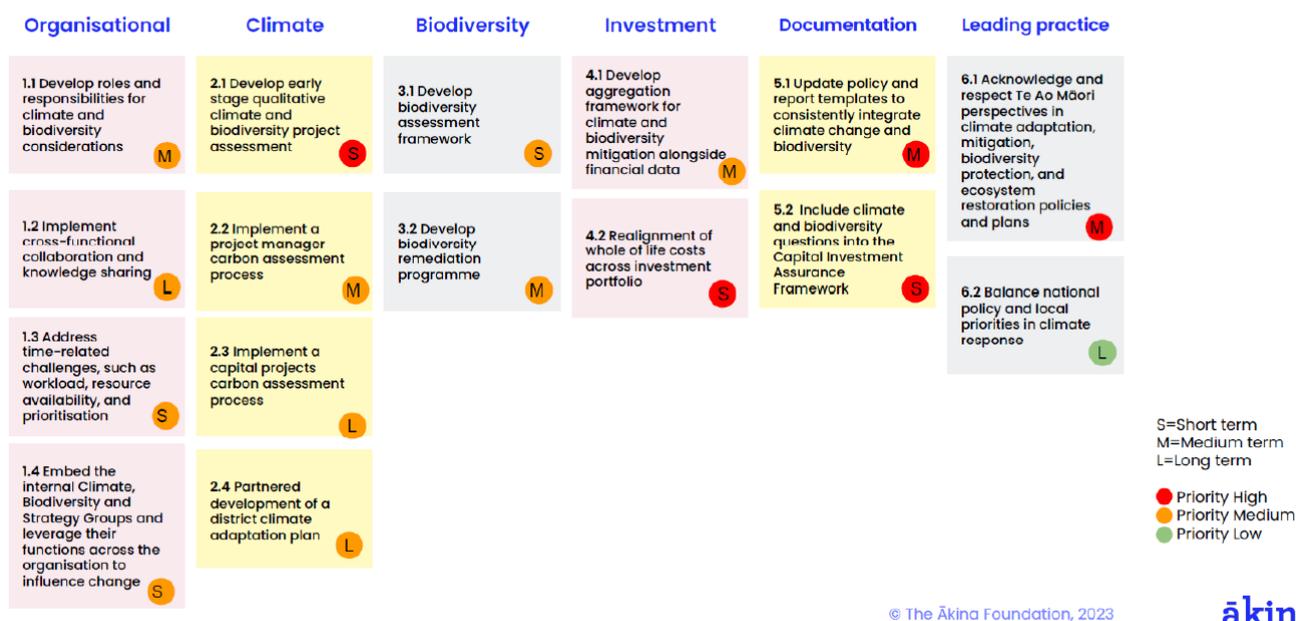
- Phase one- Evaluate the current state of climate change and biodiversity considerations in decision making at QLDC as well as assessing leading global practice. Provide recommendations for interventions that will align QLDC with this best practice.
- Phase two- Identify the priority recommendations for implementation and then co-design a suite of tools, training and system improvements with Council staff.

- Phase three- Deliver a training programme that will enable QLDC’s Officers, Elected Members and decision-makers to be fully equipped to use the tools designed.

28. A report for phase one of the project has been completed which includes the following table of improvement recommendations.

## Recommendations

For embedding climate change and biodiversity considerations into Queenstown Lakes District Council decision-making



**Figure 7: Recommendations made in Phase One of Project Taiao**

29. These recommendations have been reviewed and a prioritised list has been identified for progression into phase two of the project. The recommendations that will be prioritised are:

- 1.1 Develop roles and responsibilities for climate and biodiversity considerations
- 2.1 Develop early stage qualitative climate and biodiversity project assessment
- 2.2 Implement a project manager carbon assessment process
- 3.1 Develop biodiversity assessment framework
- 3.2 Develop biodiversity remediation programme
- 4.1 Develop aggregation framework for climate and biodiversity mitigation alongside financial data
- 5.1 Update policy and report templates to consistently integrate climate.

30. The phase three training programme to embed the newly designed tools and system changes and is anticipated to be launched in August 2023.

### **Action 1.22- Develop new Climate & Biodiversity Plan website**

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31. The development of a new website to communicate the progress of the Climate & Biodiversity Plan is nearing completion. The sitemap, design and content features of the site have been approved and work is now progressing with Council staff to upload and edit the final content.
32. The website will allow Council to communicate and promote its climate action and biodiversity progress in a far more effective manner. The new website will allow regular progress updates on all CBP actions to be posted, stories of climate and biodiversity success from across the district to be shared, latest news and research on climate and biodiversity to be collated, navigation to partner organisation websites and information to be provided on what individual, business and schools can do to support the achievement of the district's climate and biodiversity goals.

## **OUTCOME 2: OUR TRANSPORT SYSTEM IS LOW-EMISSION AND BETTER CONNECTED**

### **Action 2.1e- Upper Clutha Community Shuttle Trial**

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33. Following a successful Community Shuttle Trial by Community Networks/LINK Upper Clutha in 2022, QLDC in conjunction with Lake Wānaka Tourism (LWT), is funding a second trial that runs between 29<sup>th</sup> May until 18<sup>th</sup> August 2023.
34. The trial is being supported by a project team with representatives from QLDC, LWT, Yello, Community Networks/LINK and ORC. The aim of this second trial is to refine elements of the first phase in response to feedback; test different network design options; and collect further patronage data and feedback to inform long-term public transport planning. Interest in the project is high across Otago as it delivers upon a key commitment in the [Regional Public Transport Plan](#) (5.3.2) to trial new services models to improve community access to the public transport network.

## **OUTCOME 3: OUR BUILT ENVIRONMENT IS LOW EMISSION AND RESILIENT**

### **Action 3.3- Support energy demand management technologies, tools and behaviour change to decrease energy usage at peak times**

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35. Significant progress has been made by QLDC with regards to advocating for improved energy resilience in the district. [Recent announcements](#) from Transpower, Aurora and Powernet for a partnership investment to improve the capacity of power supply into the Whakatipu basin are a highly important step towards securing the future electricity supply.
36. Progress is also being made with regards to investigating new technology, tools and information datasets to help decrease energy demand at peak times. A potential partnership with Rewiring Aotearoa to help catalyse a shift to greater energy efficiency within the community and local

industry is being explored. Content on home residential energy efficiency options will also be included within the soon to be released CBP website which will provide a foundation for launching future community behaviour change campaigns.

#### **Action 3.4- Sustainable Building Guidance**

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37. QLDC has joined NZ Green Building Council (NZGBC) and is working with the Superhome Movement to investigate funding options to support a revision update of their [Healthy Home Design Guide](#). This guide provides a comprehensive overview of key design principles and homeowner decisions that can lead to home builds that are warmer, more thermally efficient, lower emission, lower cost and which minimise waste.

### **OUTCOME 4: OUR COMMUNITIES ARE LOW-EMISSIONS AND RESILIENT**

#### **Action 4.6a- Community Climate Adaptation Projects- Wildfire risk**

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38. A Wildfire Working Group has been established to support the mitigation planning for wildfire risk across Council reserves. There are several workstreams that are being coordinated to support a holistic approach to wildfire risk reduction. These include workstreams on public education and risk communication, business cases for vegetation management and investment in early warning detection systems.

39. The project to install the early warning systems is tracking well with the site locations for two networks of 5 sensors confirmed for both the Ben Lomond reserve and the newly acquired Mount Iron Reserve. This project is a collaboration between Council, Spark Innovation Team and [Attentis Environmental Sensors](#).

40. Christchurch City Council pioneered the first pilot project for these sensors in New Zealand and were recently awarded the [Digital Local Government award at the Taituarā annual awards](#). Several other sensor network installations are now being developed for high fire risk locations across the South Island.

#### **Action 4.6a- Community Climate Adaptation Projects - Glenorchy Head of the Lake Hazards programme**

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41. The ORC Natural Hazards team recently provided a [detailed update](#) to the ORC Safety & Resilience Committee on 10 May 2023 on the progress of the Head of the Lake hazard programme as well as the work that is planned for an Otago Regional Natural Hazard Risk Assessment programme.

42. A [community update newsletter](#) update has been recently issued by the ORC with details on the latest progress updates for the programme.

43. QLDC has a strong interest in both programmes and discussions are currently underway with the ORC Natural Hazard team to investigate options for an improved project management and

governance structure that can support with the planning, funding and governance reporting for the various workstreams within the programmes.

#### **Action 4.7- Queenstown Lakes Food Network**

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44. QLDC is working in partnership with WaoWānaka on a [Food Resilience program](#) that has investigated the vulnerabilities of the local food system and what the opportunities are to improve its resilience to the threat of disruptive shocks and sustained stresses.

45. The project has involved several workstreams including:

- Development of a food system stakeholder register
- In depth interviews with individuals and business representatives across the local food system
- Research into the historical food production and processing capacity of the district
- Coordination of a Food Resilience community survey which collected over 750 responses
- Development of a geographic information system (GIS) mapping tool that integrates data on climate, soil type, zoning and foraging locations
- Research into global and national food network models that have successfully improved the resilience of local food systems
- Coordination of a Food Resilience hui in May that brought together key stakeholders to discuss the challenges and vulnerabilities of our food system and evaluate the best options for launching a network/advocacy group model.

46. A report on phase one of this Food Resilience project can be [found here](#). Phase two will launch in early FY2023/24.

#### **Action 4.9 - Support gardening skills, food growing hubs and the development of community composting.**

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47. As part of Local Food Month in March 2023, QLDC supported the Wao Wānaka Autumn Harvest Long Lunch to promote the Love Food Hate Waste campaign messaging. The three-course plant-based lunch event celebrated locally harvested food and our regional artisan growers, as well as landfill-diverted food collected by KiwiHarvest.

48. QLDC continues to support the Dr Compost Programme and the Queenstown branch of KiwiHarvest to divert edible food waste away from supermarkets, bakeries, wholesalers, producers, cafes, restaurants and hotels and distribute this to social service and community agencies within the Queenstown Lakes district. The funding agreement is in place for the 2022/23 and 2023/24 financial years.

49. With co-funding from the Ministry for the Environment, agreements are in place with two community partners for the establishment of two community composting hubs. Expression of interests will soon be requested for the initiation of the next hubs.

## **OUTCOME 5: LOW-EMISSION BUSINESSES THRIVE**

### **Action 5.2- Implement the actions outlined in the Destination Management Plan:**

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50. The Climate Action team provided funding and resourcing support for the [Queenstown Lakes Carbon Zero Discussion Paper](#) which was released publicly in May. The paper explores the challenge of establishing an estimate of the GHG emissions for the visitor economy as well as pathway options for the emissions reduction investments that will be required to reach the goal of carbon zero by 2030. Feedback on the paper is invited to help identify decarbonisation initiatives, explore measurement methodology options, and partner investment in new innovative solutions.

### **Action 5.5-Sustainable Event Guide**

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51. A waste and emission reduction guide for event managers is under development which will bring together best practice guidance from the sector. Industry feedback on the new toolkit will be coordinated and key partner organisations such as Sustainable Queenstown will be involved in its promotion.

## **OUTCOME 6: A FLOURISHING NATURAL ENVIRONMENT**

### **Action 6.1 Undertake a review of the impact of climate change on indigenous ecosystems in the district**

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52. QLDC is supporting work to investigate the impacts of climate change on local indigenous ecosystems through an optimal biodiversity mapping project. The research is being led by Wildlands Consultants and project managed by Southern Lakes Sanctuary. The aim is to produce an open source resource that can be used to guide biodiversity planning for the district.
53. The project is an important foundation piece for a larger programme of activity that relates to the restoration of indigenous ecosystems across the district and is targeted for completion in Q1 of the next financial year.

### **Action 6.2 Integrated Biodiversity Work Programme**

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54. A review of QLDC's biodiversity commitments in reserve management plans, policies and work programmes is complete. Engagement with community groups, ORC and other conservation organisations is continuing, and a report will be produced at the end of Year 1 to summarise key biodiversity initiatives, challenges and opportunities across the district.

55. In May, QLDC provided funding and staffing support for the New Zealand Plant Conservation Network (NZPCN) Restoration Pathways Workshop, which was a follow up to their recent conference focusing on restoration ecology in New Zealand. The purpose of the workshop was to gather information from conference participants and restoration practitioners who work in the district to share stories about their restoration experiences with the goal of identifying successful pathways that could guide future restoration work in the district. A synthesis document from the workshops will be made available via the NZPCN website.

### **Action 6.5 Blue-Green Network**

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56. Boffa Miskell has been engaged to develop the Blue-Green Network Plan, which is a key initiative within both the Spatial plan and Climate & Biodiversity Plan.

57. The work programme will comprise of a number of Community Open Space Network Plans which will inform the future planning for open space reserves, native vegetation corridors and waterway connections for communities across the district. They will consider the anticipated growth of communities as well as the key biodiversity attributes of the area. The network plans will provide communities with access to a range of recreational, social, cultural, and environmental experiences. This includes protection and access to Mahinga Kai for mana whenua and protection of Wāhi Tūpuna sites.

58. The plans, which are expected to be available in November 2023 will be an important future mechanism that QLDC will use to determine and prioritise spending on parks, open space, and social infrastructure for the community.

### **CLIMATE REFERENCE GROUP**

59. Several new appointments to the Climate Reference Group were confirmed in April 2023 as part of a reset of the group membership. The new appointees are as follows:

- Dr Chris Cameron
- Victoria Crockford
- Leslie Van Gelder
- Sydney Telfer (rakatahi representative).

60. The appointment of a new Kāi Tahu ki Murihiku representative to the Climate Reference Group has also been confirmed. Evelyn Cook will be joining as representative from the Te Ao Mārama rūnaka.

61. The selection process for a new independent chairperson is currently underway. Applications for the role were recently advertised with a number of candidates submitted their application. The Governance Subcommittee will be leading the interview and appointment recommendation process.

### Significance and Engagement | Te Whakamahi I kā Whakaaro Hiraka

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62. This matter is of low significance, as determined by reference to the [Council's Significance and Engagement Policy](#) because it is consistent with existing strategy, and does not impact on the objectives set out in the Financial Strategy, Ten Year Plan or Annual Plan. Although the Climate and Biodiversity plan is of high importance to the district and community, the matter is of low significance because current progress is aligned with the goals and outcomes of the plan.

### Māori Consultation | Iwi Rūnaka

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63. The Council has partnered with rūnaka representatives in the development of the Climate and Biodiversity Plan 2022/25 and undertakes regular engagement on its progress through the Climate Reference Group.

64. Opportunities for alignment and integration with Kāi Tahu's Climate Change Strategy Te tāhū o te whāriki are regularly being discussed and explored.

### Risk and Mitigations | Kā Raru Tūpono me kā Whakamaurutaka

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65. This matter relates to the Environmental risk category. It is associated with RISK00019- Ineffective mitigation response to the declared climate and ecological emergency and RISK00059- Ineffective planning to support Climate Change Adaptation within the [QLDC Risk Register](#). This risk has been assessed as having a very high inherent risk rating.

66. The Climate and Biodiversity Plan supports Council to implement additional controls for this risk. The 70 actions with the plan represent a broad mitigation response to the challenges associated with emissions reduction, climate change adaptation and biodiversity restoration. The effectiveness of the implementation of these mitigations is supported through the advisory oversight of the Climate Reference Group and the governance of the Audit, Finance and Risk Committee.

### Financial Implications | Kā Riteka ā-Pūtea

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67. There are no variances to operational budgets or resource implications to consider at this time.

### Council Effects and Views | Kā Whakaaweawe me kā Tirohaka a te Kaunihera

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68. The following Council policies, strategies and bylaws were considered:

- The Climate and Biodiversity Plan is aligned to the principles of the Vision Beyond 2050, particularly Zero Carbon Communities, Disaster-Defying Resilience and Deafening Dawn Chorus <https://www.qldc.govt.nz/vision-beyond-2050/>
- Related policies, strategies and bylaws (including Management plans) include:
  - 2018-48 Infrastructure Strategy
  - 2018 Three Waters Asset Management Plan
  - 2018 Transportation Activity Management Plan
  - 2018 Waste Minimisation and Management Plan

- The QLDC Disability Policy was considered in the development of the Climate and Biodiversity Plan.  
<https://www.qldc.govt.nz/assets/Uploads/FINAL-Disability-Policy-May-2018.pdf>
- Further reference to Council policies can be found here: <http://www.qldc.govt.nz/policies>

69. The recommended option is consistent with the principles set out in the above named.

70. This matter is included in the [Ten Year Plan](#)

- Message from the Mayor and Chief Executive - pg 5
- What's Changed?- pg 19
- Taking Climate Action pg 45
- Disaster Defying Resilience pg 54
- Climate Action – pg166
- Risk, Resilience and Climate Action- pg 167

71. This matter is also included in the [Annual Plan](#)

- Message from the Mayor and Chief Executive- pg 4

#### Legal Considerations and Statutory Responsibilities | Ka Ture Whaiwhakaaro me kā Takohaka Waeture

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72. There are no legal considerations to take into account at this time.

73. The Council has statutory responsibilities under the [Climate Change Response \(Zero Carbon\) Amendment Act 2019](#) as a reporting organisation.

#### Local Government Act 2002 Purpose Provisions | Te Whakatureture 2002 o te Kāwanataka ā-Kiaka

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74. The recommended option:

- Section 10 of the Local Government Act 2002 states the purpose of local government is (a) to enable democratic local decision-making and action by, and on behalf of, communities; and (b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future. The Climate and Biodiversity Plan plays a central role in delivering upon this purpose through its focus on environmental stewardship, community resilience and intergenerational equity;
  - Can be implemented through current funding under the Ten Year Plan and Annual Plan;
  - Is consistent with the Council's plans and policies; and
  - Would not significantly alter the intended level of service provision for any significant activity undertaken by or on behalf of the Council or transfer the ownership or control of a strategic asset to or from the Council.
-