

Canterbury Mayoral Forum Submission on the Ministry for the Environment's Draft National Adaptation Plan

1. The Canterbury Mayoral Forum thanks the Ministry for the Environment for the opportunity to provide feedback on the draft National Adaptation Plan (draft NAP) package: *Te mahere urutaunga ā-motu, the draft National Adaptation Plan* and *Kia urutau, Kia Ora: Kia āhuarangi rite a Aotearoa, Adapt and thrive: Building a climate-resilient New Zealand* discussion documents, released in April 2022.

Background and context

2. The Canterbury Mayoral Forum comprises the mayors of the ten territorial authorities in Canterbury and the Chair of the Canterbury Regional Council (Environment Canterbury) supported by our Chief Executives. The purpose of the Forum is to promote collaboration across the region and increase the effectiveness of local government in meeting the needs of Canterbury's communities.
3. The eleven local authorities are: Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki District Councils; the Christchurch City Council and Environment Canterbury.
4. In this submission, the Canterbury Mayoral Forum has provided comments on the key issues for Canterbury in the consultation document. We note that Environment Canterbury, Christchurch City Council, Selwyn District Council, Waitaki District Council, Waimakariri District Council and Ashburton District Council are also planning to make individual submissions.

General comments

5. The Canterbury Mayoral Forum would like to draw the Ministry's attention to its submission on both the *Te mahere urutaunga ā-motu, the draft National Adaptation Plan* and *Kia urutau, Kia Ora: Kia āhuarangi rite a Aotearoa, Adapt and thrive: Building a climate-resilient New Zealand* which provides answers to many of the questions posed in the consultation documents.

Mayors standing together for Canterbury.

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6. The Canterbury Mayoral Forum's response to the consultation questions is structured under the eight key themes of the consultation document *Te mahere urutaunga ā-motu, the draft National Adaptation Plan (Part 1)*, and includes separate comments on the consultation document *Kia urutau, Kia Ora: Kia āhuarangi rite a Aotearoa, Adapt and thrive: Building a climate-resilient New Zealand (Part 2)*.
7. The Canterbury Mayoral Forum supports the intent of the draft National Adaptation Plan and the need for national direction on climate adaptation action in Aotearoa. We support and encourage the National Adaptation Plan to work with the National Emissions Reduction Plan as the cornerstones of climate action in Aotearoa.
8. The Canterbury Mayoral Forum has just completed its first-ever detailed climate change risk assessment (the Canterbury Climate Change Risk Assessment), identifying priority risks and opportunities from climate change to Waitaha/Canterbury's natural and built environment, social, cultural, economic and governance systems.
9. A key deliverable has been the development of a new Ngāi Tahu-informed climate change integrated framework for assessing climate change risks to which Ngāi Tahu gifted the name *Te Tūtei o te Hau – Surveillance of the Wind* (see figure below). This integrated framework incorporates key aspects of the national climate change risk assessment framework, interconnected risks (the first in New Zealand), Ngāi Tahu values, and Mātauranga Māori.
10. Our risk assessment shows climate change risks increasing between now and 2100 across the Waitaha / Canterbury region. The highest risks to 2100 include those to Rerenga Rauropi (Biodiversity), Wai (Water), (Ngā Waihanga (Infrastructure services), and Hapori (Sense of community). Present-day risks that are rated extreme include those to water supply (both ground and surface water) due to increased dry conditions, and housing and communities due to flooding. Further detail can be found in the risk assessment report [[Canterbury Climate Change Risk Assessment](#)].
11. The projected increase in the intensity and frequency of extreme events means that disruptions and costs are expected to increase. The Canterbury Mayoral Forum recognises and supports the need for central government to act in several areas to help facilitate the growing role of regional councils and ease the funding burden on ratepayers. There is a need for mechanisms to ensure that the costs of climate change adaptation are shared equitably, both inter-generationally and intra-generationally.

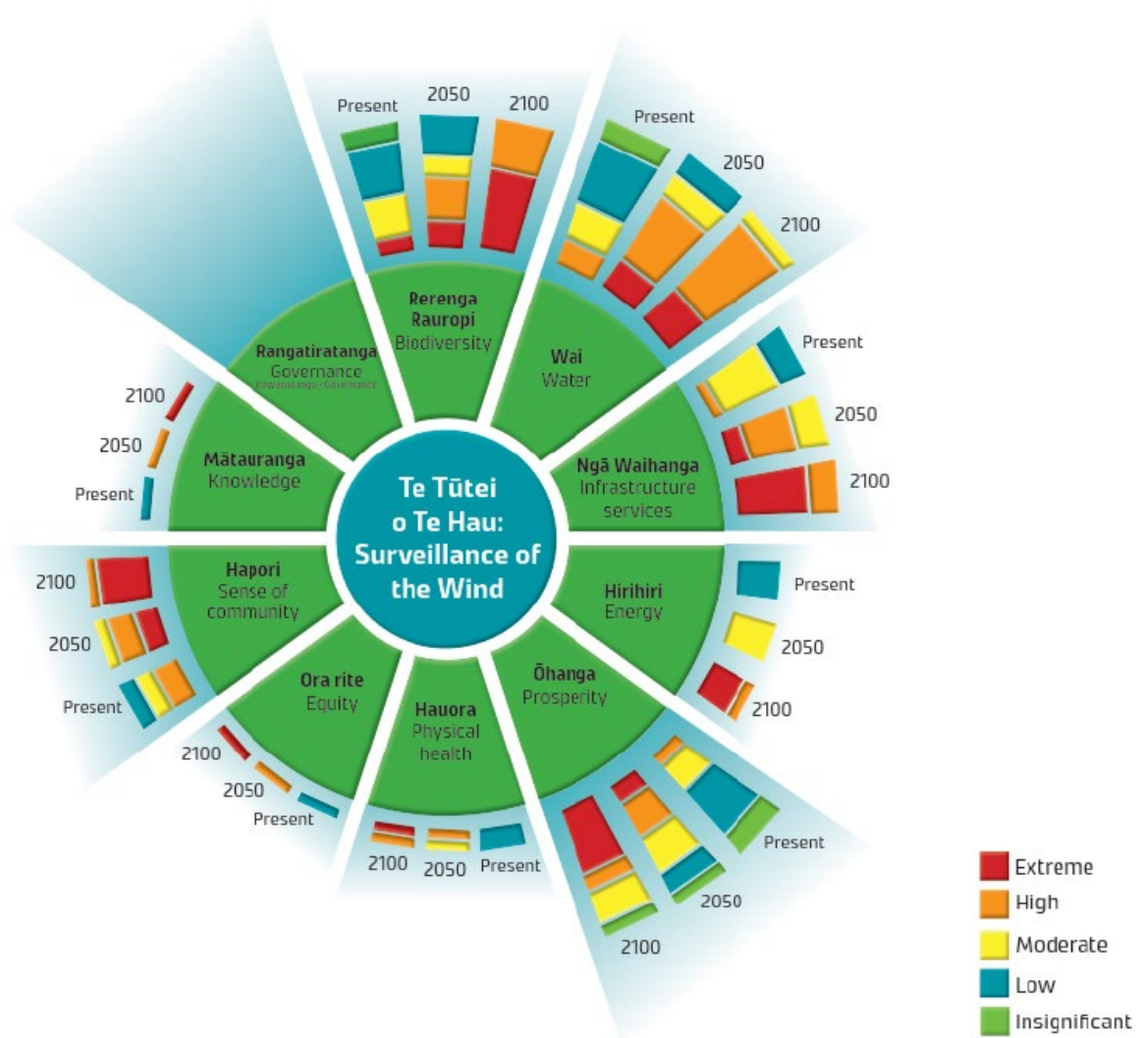


Figure 1: Visual summary of risks in the different values to Canterbury in the present, 2050 and 2100. Note, due to the social nature of the ngā pono - Rangatiratanga (Governance) the risks in this category were assessed qualitatively and not ordered.

12. With such climate futures, the Canterbury Mayoral Forum supports and encourages a bold and ambitious national response that acts with the urgency and practicality required to address Aotearoa and the world's climate emergency.

Part 1: Comments under the key themes of *Te mahere urutaunga ā-motu, the draft National Adaptation Plan*

General comments

13. Besides a brief note on transitional challenges for the private sector, the draft NAP exclusively covers biophysical risks. While we recognise that this aligns with the scope of the National Climate Change Risk Assessment, local government is likely to face significant transition risks such as litigation, change in policy direction and adverse effects on investment portfolios. We therefore urge government to include both a narrative and corresponding actions on how to address transitional risks across all sectors besides businesses.
14. We strongly encourage the Ministry to create a more deliberate link between upcoming adaptation and mitigation work through the National Adaptation Plan and the National Emissions Reduction Plan. This should include how government will support wider sustainability achievements of outcomes sought through Agenda 2030 for the Sustainable Development Goals.
15. The Canterbury Mayoral Forum highlights the need for clearer direction on how government strategies and plans will integrate climate action under focus area 3 (embed climate resilience across government strategies and policies) and how these link to the National Emissions Reduction Plan goals and be audited to ensure compliance and minimise conflicting objectives and maladaptation.
16. Beyond what is outlined in the draft NAP we emphasise that greater collaboration and cooperation with all relevant stakeholders, including private stakeholders, in the process of national adaptation planning will be crucial to have the most widespread and long-term benefit for New Zealand.

System-wide actions

17. The Canterbury Mayoral Forum agrees with the objectives set out in this chapter and the factors holding up fast tracking of adaptation planning.
18. The draft NAP focuses on three key areas
 - a. reform institutions
 - b. provide data, information and guidance and
 - c. embed climate resilience across government strategies and policies.

The Canterbury Mayoral Forum emphasises that all three areas are critical to achieving a holistic response to climate change adaptation, and one cannot be considered above the others.

19. Given the different timelines and workstreams for development of four major government reform programmes, such as the Resource Management Reform, the Future for Local Government Reform, the Three Waters Reform and the Emergency Management Act,

there is high potential for lack of integration between these system components. We are not currently convinced that climate change will be sufficiently and consistently factored into these reforms and encourage the NAP to provide guidance or identify an action to develop guidance on how climate change should and will be considered in these reforms.

20. The upcoming Emergency Management Bill is likely going to place responsibilities on local government to increasingly prioritise risk equity and resilience amongst communities disproportionately impacted by climate change. We encourage the Ministry to ensure that the climate change, emergency management and sustainable development law and policy support each other and are not designed in isolation.
21. We also emphasise the need to strongly link the National Disaster Resilience Strategy 2019-29 to the National Adaptation Plan and ongoing climate adaptation legislation.
22. The Canterbury Mayoral Forum agrees that we all have a role to play in building resilience to climate change and that some New Zealanders may be more affected and less able to respond. Key actions that are essential to adapt to climate change are
 - a. availability of reliable information to accurately quantify the extent of impact
 - b. legislation and funding to support adaptation action
 - c. collaboration with various stakeholders to carry out an inclusive and just transition.
23. We particularly emphasise the strong need for an inclusive and just transition for New Zealand's rural and agricultural communities. We note a collaborative and inclusive approach to implementing the actions set out in the draft NAP would help to ensure that existing inequities are not exacerbated.
24. We acknowledge and agree with the statement made in the draft NAP, that the costs of adapting to climate change cannot be covered solely by central government. Local government has a key role to play in adaptation planning, however, funding mechanisms currently available to local government are insufficient to meet the challenge of climate change. The government must explore new funding mechanisms or changes to existing ones as critical actions in the NAP, to enable local government to play an appropriate role in climate change adaptation.
25. We agree that a taxonomy of 'green activities' for New Zealand would support unlocking investment for climate resilience, especially in the mitigation space. We urge the draft NAP to include more detail on how these investments will support adaptation planning.
26. The question of inter-generational and intra-generational equity in response to who pays for the cost of adaption measures such as managed retreat has not been fully explored in the draft NAP. While the Canterbury Mayoral Forum agrees that those benefiting the most from adaptation options should be contributing, we recognise a major equity issue and are concerned that the burden of adaptation costs will fall on those least able to afford it.

27. The Canterbury Mayoral Form agrees that there are economic opportunities in adapting to a changing climate. Central government has a leading role to play in harnessing these opportunities, given its direct control on functions such as environment health, tourism, business and more. We encourage the government to interact with local government on all such initiatives and include climate change opportunities in adaptation planning and the National Adaptation Plan.
28. The Canterbury Mayoral Forum agrees that the new tools, guidance and methodologies set out in this chapter will be useful. We suggest a faster and staged delivery of the Adaptation Information Portal and integration with regional initiatives to develop adaptation information given its importance in beginning the conversation on understanding impacts and taking action.

Homes, buildings and places

29. We strongly agree with the need to make homes, buildings and places resilient to the changing climate change, in order to allow people and communities to thrive. While we broadly agree with the objectives and actions set out in this chapter, we suggest that more robust measures – not just encouragement – should be developed to ensure the building sector, as well as regional and urban planning, adequately factor in climate change adaptation.
30. We note the reference in this chapter to the system-wide reforms that will encourage a more long-term and proactive view that better accounts for climate change. This includes the resource management reforms that will require spatial planning at the regional level. We wish to reaffirm our strong support for a strengthened partnership approach between central government, local government and mana whenua to develop plans for how places will grow and change in the future in the context of the significant opportunities and challenges we face – with our response to climate change being the most significant challenge we face.
31. We suggest the important role of taking a partnership approach to develop long-term spatial plans, both for regions and major urban areas across the country, should be further highlighted in this chapter. The development of these plans and subsequent implementation of joint work programmes will require enduring partnerships between central government, local government and mana whenua to be successful.

Infrastructure

32. The Canterbury Mayoral Forum fully supports government action to prepare infrastructure for a changing climate in Aotearoa as well as the outcome statements and objectives. We acknowledge the identification of actions in the draft NAP to support adaptation across all infrastructure types and regions in Aotearoa.
33. To further prepare Aotearoa's infrastructure to a changing climate, we encourage government to also factor in new water entities into adaptation planning processes.
34. The draft NAP has identified several actions to support adaptation in all infrastructure types and all regions of Aotearoa. We note that while we can have a comprehensive

understanding of risks, there is a strong need for tools to gradually de-escalate investment in at-risk areas and to strategically signal and implement level of service decreases in these areas. It is crucial to have a clear line of sight well into the future so that actors in the system can gradually reduce their risk profile over time and know what to expect well in advance.

35. We emphasise that the proposed resilience standard or code for infrastructure should be mandatory for all new infrastructure built by a specific date. We strongly discourage any further investment in at-risk assets and encourage considering at-risk assets in our maintenance programmes as soon as possible. Infrastructure asset managers value certainty and planning for the long-term, and expenditure is planned out 30 to 50 years in advance. We note that adapting our infrastructure to a changing climate is near-term in infrastructure planning terms and emphasise the need to apply a long-term planning lens.
36. While we acknowledge the actions set out for infrastructure are a good start, we are concerned that current funding and financing tools are inadequate for infrastructure providers to begin adapting their existing networks to respond to climate risk. We encourage considering infrastructure funding and financing more closely.
37. We consider non-built solutions (e.g. changing the way we collect transport revenues or integrating transport and land use to drive down congestion) should be considered ahead of physical changes to infrastructure. Infrastructure is expensive to build and maintain. Much of our infrastructure is long-lived, lasting in excess of 50 to 100 years, and similarly has a long-lasting influence on human behaviour. Considering non-built solutions first reduces the risk of over-investing in potentially stranded assets and allows infrastructure providers to be more adaptive and responsive to emerging risks.

Communities

38. The Canterbury Mayoral Forum strongly supports applying an equity lens, both intergenerationally and across currently vulnerable people. In Waitaha/Canterbury some of our poorer communities are based in settlements near lagoons and river mouths. These communities are already impacted by climate change-induced flooding and coastal inundation. More tools and support are needed to support councils to have meaningful and authentic conversations with them about future viabilities of their communities.
39. We support the development of a Health National Adaptation Plan and strongly encourage a particular focus on mental health, especially for young people. Mental health risks of climate change were identified in the Canterbury Climate Change Risk Assessment as a high risk and should be mitigated.
40. To the actions set out in this chapter we note that local government and iwi need much greater support to engage with schools to ensure that the action to 'strengthen teaching and learning related to climate change' is complemented by local information and knowledge as part of the localised curriculum objectives of the National Curriculum framework.

Economy and financial system

41. To the actions set out in this chapter, we emphasise that unlocking investment in climate resilience is critical and therefore important to ensure the costs are shared equitably through incentives and disincentives in fiscal and financial settings.

Research strategy

42. Climate change will also present possible economic, social, and environmental opportunities in several sectors. Both the “Economy and Financial System” and the “Research strategy” outcome areas in the draft NAP have not mentioned any intent by Government to investigate these opportunities across some economic growth and wellbeing sectors in New Zealand e.g., Agriculture and Tourism. We urge government to prioritise investments into the research and development of actions on opportunities in the draft NAP.
43. Following the completion of our first Canterbury Climate Change Risk Assessment based on the processes outlined in *He kupu ārahi mō te aromatawai tūraru huringa āhuarangi ā-rohe / A guide to local climate change risk assessments*, we have identified a significant data gap on the socio-economic impacts of the identified risks. We therefore urge government to address this data gap and include this aspect in its final Plan.

Part 2: specific comments on managed retreat which will inform the initial stages of policy development for the Climate Adaptation Act

General Comments – Climate Change Adaptation Act and Managed Retreat

44. We support the government being proactive in how we consider managed retreat as an adaption option. Based on experiences in Waitaha/Canterbury, such as the red zoning after the 2010/11 Canterbury Earthquake Sequence we know how incredibly stressful and complex for communities a voluntary relocation process can be, and for local government the need to balance community wellbeing and the provision of services in areas which have elevated levels of risk. We note that planning changes are not instantaneous, and people will remain in an area beyond when a plan says existing use should be extinguished.
45. Across all government literature there has not been a clear and consistent definition on managed retreat. We support the conclusion of the National Science Challenge: Resilience to Natures Challenges 2017 Report¹ that “to enable robust and clear interpretation of the approach across New Zealand, a definition of managed retreat at the national level is paramount”. We would also stress a clear component of managed retreat is the strategic, planned, and pre-meditated nature of the movement.

¹ Hanna, C., White, I., Glavovic, B. (2017). Managed retreat in New Zealand: revealing the terminology, approaches and direction of local planning instruments. Report for the National Science Challenge: Resilience to Natures Challenges, University of Waikato, New Zealand.

Principles and Process for managed retreat

46. We support the objectives and principles of the legislation set out in the consultation document *Kia urutau, Kia Ora: Kia āhuarangi rite a Aotearoa, Adapt and thrive: Building a climate-resilient New Zealand*.
47. We note that managed retreat is not the only adaptation option and encourage dynamic adaptation pathways to be developed in collaboration with the local community. We support a process that places communities at the heart of discussions and works with local government, communities and mana whenua as partners in climate change action.
48. Community wellbeing support for the receiving community is as important as support for the displaced community and we encourage the principles to include community engagement with both groups.
49. We note that climate change is only one of a number of issues facing New Zealand and that areas face complex risk profiles. For example, an area exposed to low flooding risk may be exposed to a high geotechnical risk or high risk to freshwater quality and quantity. We recommend the inclusion of a principle to consider risk holistically and for a no-regrets scenario.
50. We support a process of adaptation which is dynamic, locality-specific, aligned with international best practice, and ultimately enhances community wellbeing.
51. We have some concerns on the objectives and principles related to funding responsibilities, particularly the balance between central government and local government funding, as expressed in paragraph 24.
52. The success or failure of a managed retreat framework will depend on how successfully the whole system integrates these mechanisms across all major government reforms. The timeline dislocations of these reforms provide limited opportunity to assess the reformed system holistically.
53. We support the inclusion of a specific reference to mana whenua to 'Stage A/Initiation' and 'Stage B/Planning' in keeping with Te Tiriti and in recognition of the connection mana whenua have with the land.

Roles and Responsibilities for managed retreat

54. We suggest that central government and regional councils have a joint responsibility with district councils for the development, provision and interpretation of data to support adaptation.
55. Across the regional sector we note a lack of detailed information on community vulnerability and exposure to climate-induced natural hazards. This information is needed to identify areas where adaptation planning is urgently needed. We encourage increased emphasis on work to support vulnerability-based information to allow for high-quality community discussion, decision making and prioritisation for high-risk areas.

56. We wish to reiterate here our earlier point that outcomes from District Plan changes are not instantaneous as people will remain in an area beyond when a plan change is enacted. We would encourage the new legislation and roles within to be cognisant of this reality.

Funding

57. We strongly recommend central government take an active role in the funding of adaptation options. We are already seeing climate change as a major stress on existing local government funding mechanisms and increased community support for taking innovative approaches to funding.

58. Although we consider that those most benefiting from an adaptation option (from both civil society and private enterprise) have a role in contributing to that initiative (as this is the logic for the development of targeted rates) the rising costs of adaptation are causing major concern especially as an equity issue.

Conclusion

59. Thank you once again for the opportunity to make a submission on this consultation document.

60. In summary, the Canterbury Mayoral Forum considers the release of the draft NAP a significant step towards adapting Aotearoa to a changing climate and achieving New Zealand's climate goals. We do, however, strongly recommend that more detail be provided on the interventions that will be put in place, how they will be funded, and how various policy frameworks will be aligned to achieve climate objectives.

61. We would like to conclude by reiterating our earlier comments that local government plays a major role in New Zealand communities' transition to a climate resilient future. A strong and enduring partnership approach with local government to support development and implementation of the National Adaptation Plan is clearly required going forward.

62. Our secretariat is available to provide any further information or answer any questions the Ministry may have about our submission. Contact details are: Maree McNeilly, Canterbury Mayoral Forum Secretariat, secretariat@canterburymayors.org.nz , 027 381 8924.

Ngā mihi



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