

Submission to the Ministry for the Environment

Te mahere urutaunga ā-motu, the draft National Adaptation Plan

*Kia urutau, kia ora: Kia āhuarangi rite a Aotearoa - Adapt and thrive:
Building a climate-resilient Aotearoa New Zealand*

- *Draft National Adaptation Plan*
- *Draft National Adaptation Plan: Managed Retreat*

3 June 2022

Introduction

1. The Timaru District Council thanks the Ministry for the Environment for the opportunity to submit 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 late April 2022.
2. Both documents deal with complex issues. The Council acknowledges that these documents represent a starting point on climate change adaptation planning and that significant work will continue as the plan is regularly reviewed. The Council looks forward to continuing to contribute to this discussion as the detail emerges.
3. This submission is made by the Timaru District Council, 2 King George Place, Timaru. The submission has been endorsed by Mayor and Councillors. The contact person for Council is Nigel Bowen, Mayor of the Timaru District, who can be contacted at Timaru District Council, phone (03) 687 7200 or PO Box 522, Timaru 7940.
4. The contact person regarding the submission content is Mark Low, Timaru District Council, who can be contacted on (03) 687 7200 or mark.low@timdc.govt.nz.

Timaru District

5. The Timaru District Council is a local authority in the South Island serving over 48,000 people in South Canterbury. The main settlement is Timaru, with other smaller settlements of Geraldine, Pleasant Point and Temuka.
6. Council is working to develop a climate change strategy and has set aside funding to resource work in the climate change area. Council is early in its climate change journey and has significant work to do.

Te mahere urutaunga ā-motu, the draft National Adaptation Plan - General Comments

7. Council has the following comments on the draft National Adaptation Plan (NAP) overall and looks forward to its ongoing development. It acknowledges that the DNAP represents one of the cornerstones of climate response, with the Emissions Reduction Plan the other key cornerstone.
8. The Council supports the submission of the Canterbury Mayoral Forum (CMF) on this work, and efforts in Canterbury to improve understanding of and approaches to mitigate and adapt to the effects of climate change on local communities. Council encourages responses to climate change to be rooted in local action.
9. Council supports the creation of the NAP. Both this and the associated Adapt and Thrive documents are comprehensive and well-written drafts. They identify many issues relevant to climate change adaptation. Further issues will undoubtedly arise as we gain a deeper understanding of the social, economic, cultural and environmental impacts of climate change and this further understanding can build on these draft documents.
10. TDC supports the NAP's Vision, purpose and three primary goals of:
 - a. Reduce vulnerability to the impacts of climate change
 - b. Enhance adaptive capacity and consider climate change in decisions at all levels
 - c. Strengthen resilience to climate change
11. However, it does suggest that the Vision's aspiration of 'low-cost' may be optimistic, given the potentially significant costs associated with climate change adaptation and managed retreat. Council suggests cost-effective may be a more appropriate term.
12. Council offers the following general observations relating to the NAP:

Improved Direction Needed

13. The DNAP would benefit from a more focused discussion on the expectations and roles of local government in climate change adaptation. It is relatively silent on specific expectations for the role of Councils, and does not reference the significant transition risks Councils may face (e.g. Council allowing development insurance, change in policy direction). It offers very little direction on actions Councils can take to adapt infrastructure, land use and communities to the impacts

of climate change, the question of funding and when central government will step in to support local government.

14. The NAP should make clear the role that local government will play and this should be reflected and integrated through subsequent legislation and policy instruments. While the Plan includes a range of worthy projects and work programmes and plans to make more plans, the lack of detail makes it difficult to determine their potential impact in the local government space.
15. Priority should be given to initiatives like the proposed resilience standards/codes for infrastructure delivery to be delivered as quickly as possible to provide clarity and guidance for Councils delivering infrastructure services. Priority should also be given to development guidelines, including where development should be actively discouraged in local communities.

Better Integration

16. The NAP has been prepared against a background of a plethora of reforms to local government functions, which the plan ostensibly suggests are being undertaken to establish future institutions that are fit for a changing climate. It is critical that proposed institutional changes adequately and consistently consider climate change. There is a high risk of a lack of integration.
17. The NAP is a comprehensive list of existing, planned or potential projects but includes little reference on how local government will need to evolve to enable its local adaptation climate change response in response to these initiatives.

Lack of Ambition

18. The NAP portrays a changing climate but it is suggested that changes are accelerating, as referenced by recent studies, such as the International Panel on Climate Change (IPCC) recently updated Sixth Assessment reports and the *NZ SeaRise: Te Tai Pari O Aotearoa* programme recently released projections, which indicate the acceleration of sea-level rise in some locations, combined with vertical land movement, leading to a potential reduction in time to respond. The NAP must be suitably aspirational and ambitious, with concrete, real and tangible expectations placed on various agencies, including strong support from central government.

Funding

19. The funding impacts of climate change adaptation will be significant for all agencies, including local government. A failure in policy across multiple governments to adequately respond to climate change means that today's and future generations will disproportionately bear the costs of climate change adaptation. Suitable funding mechanisms, tools and solutions are urgently needed to deal with impacts emerging in the short, medium and long term.

20. As the outcomes of reforms to the Resource Management Act emerge, central government needs to provide clear direction and funding solutions where proposed changes conflict with existing regional or local solutions.
21. Central government funding support should also be developed to support local government to enable climate adaptation of critical infrastructure at risk. Current solutions are inadequate to address these potential issues in the future.
22. Funding clarification also needs to extend to increasing flexibility for Councils or Council-Controlled organisations (CCOs) to have the ability to plan and fund future required infrastructure solutions to climate change in advance, based on less certainty of how, when and where a project might be delivered.

Partnership

23. The NAP, while referencing the many agencies that will need to respond to climate change, fails to adequately address the opportunities to effectively work together. Council encourages the opportunity for effective, joined-up partnerships that harness the expertise and knowledge of all groups – Councils, central government, iwi, non-government organisations and volunteer groups.

Climate-related revenue generation and expenditure criteria – Who Pays?

24. Until climate-related revenue/expenditure criteria are resolved, as discussed in the Adapt and Thrive Consultation Document, many on-the-ground local actions will be delayed or postponed while stakeholders await clarity on ‘who pays?’. Clear climate change revenue generation and expenditure criteria and expectations must be established urgently.
25. In this respect, Council suggests:
 - a. Most adaptation options are technically already sufficiently understood by key stakeholders. The reluctance to acknowledge climate change reality plus the politics and revenue/costs will be the biggest and most politically fraught challenge that will unacceptably delay action on climate adaptation and mitigation.
 - b. Climate change revenue generation needs to:
 - i. be simple and easy to understand
 - ii. be proportional to the ability to pay
 - iii. include:
 - a general component - where everyone pays because most people are impacted to some extent by climate change; and
 - a targeted component (e.g. by increasing targeted revenue generation linked to emissions and climate-damaging actions and reducing revenue collection from climate-friendly actions).

Targeted revenue generation should be specific to emissions and other climate-damaging actions.

26. Alongside establishing climate change-related revenue generation, it is essential to quickly establish robust criteria for climate-related expenditure, including:
 - a. Setting criteria for how to defend/retreat/adapt decisions will be made
 - b. Defining:
 - i. how climate change revenue will be allocated by central government
 - ii. 'who else pays', given that central government will not have the resources to fully pay for all climate-related actions
 - iii. criteria for compensation (if any) for those who are impacted by climate change and how this will be equitably applied (e.g. what compensation might be paid to a pensioner whose \$400,000 house is inundated as opposed to an executive whose \$5M house is inundated or a farmer whose \$10M of productive land is inundated?)
 - iv. how climate change revenue and other resources will be allocated for climate-change-opportunities vs climate-change-defensive actions
 - v. who administers the climate adaptation fund (maybe an apolitical arrangement similar to the National Superannuation and/or ACC funds)
27. Council also agrees with the CMF submission which strongly recommends central government take an active role in the funding of adaptation options. Local government funding mechanisms are currently unfit for purpose, particularly in considering the historical, intergenerational and equity issues that will emerge where adaptation solutions are required.

Localism

28. The Plan needs to ensure it adequately addresses the issue of localism, as outlined in "Principles for Implementing Action: #6. Adapt locally: Enable communities to prepare for the unique risks and opportunities they face, and tailor intervention to the local situation".
29. Almost all physical climate change defence/retreat/adaptation actions will happen locally. Actions by stakeholders must therefore focus explicitly on what is required to enable and empower local actions.
30. A starting point for actions by central and local government and all other stakeholders must accurately identify what locals need for local decisions and actions and then design stakeholder approaches to empower and enable these.
31. Council supports the implementation of approaches which enable and empower effective local *physical* actions that represent the primary means of addressing climate change issues going forward. These actions should ensure actual real progress on climate change.

Research

32. Research is a critical component of decision-making on climate change adaptation issues. Local decisions and solutions must be well informed by *local* information. While national information is important, this should not dictate the total research agenda. Appropriate funding and support should be provided to local communities to enable councils, iwi, non-government organisations and other stakeholders to conduct research locally and ensure adequate diversity of knowledge to inform decisions.
33. The council requests that adequate funding is set aside to enable local research on issues where climate change adaptation decisions and solutions are likely to be required.
34. Given the urgency of climate change adaptation work that may be required, the philosophy behind the application of research to decision-making should be carefully considered. New Zealand and local communities should avoid 'paralysis by analysis' through delaying information while more and more research is undertaken to arrive at largely the same conclusions. Where research or information collection is required to unearth information to guide local decision-making, then that research should be identified and guided locally.

Kia urutau, Kia Ora: Kia āhuarangi rite a Aotearoa, Adapt and thrive: Building a climate-resilient New Zealand: Managed Retreat

35. Council is supportive of work to progress the managed retreat adaptation option. In Timaru District, there is the possibility that in some locations, a managed retreat option may need to be used. These are largely in areas where flooding and/or sea-level rise may render these locations uninhabitable in the future.
36. Council supports the objectives and principles for legislation and funding in the Adapt and Thrive consultation document with the proviso that legislation, funding and action recognise that physical climate change actions happen almost entirely locally so should be designed to empower, enable and inspire local actions. It notes that one of the principles is to "Limit [the] Crown's fiscal exposure". While Council supports a fiscally prudent Crown, it is hard to envisage how local adaptation and managed retreat options will be used without substantive investment and support from the Crown.
37. There is an element of 'buyer beware' in any property purchase or development decision, reliant upon suitable information on risks being available. The data and science behind climate change have developed significantly over the last 40 years, the impacts of which have only become clearer in recent years for some properties. Any framework needs to be clear about the responsibility of property owners, reflected against the complex historical, intergenerational, cultural and equity issues that may apply in a managed retreat situation.
38. Council supports a framework being developed that:

- a. Is crystal clear about the role of local government and all other agencies involved, and ideally empowers local government, given that the impacts of and responses to climate change occur locally. It believes Council should have an integral role in coordinating progress and solutions.
- b. Enables local knowledge and flexibility – every managed retreat situation will be different and will involve multiple complexities.
- c. Is a clear, logical and planned approach over potentially multiple stages
- d. Gives clear guidance on how to undertake conversations around managed retreat with communities, stakeholders and all interested parties
- e. Acknowledges the potential for significant equity issues and provides options for how these can be addressed – who retreats, where they go, who pays, differing abilities to pay and understands the broader wellbeing issues such as the breaking of community ties and cultural links to the natural environment
- f. Is clear about the trigger/level of proof required to activate a managed retreat process
- g. Provides clarity on when central government will intervene in managed retreat processes should a locally derived solution be unsuitable
- h. Clearly establishes the “who pays” aspect and revenue and expenditure criteria as a priority to minimise delaying adaptation measures