



National Adaptation Plan consultation
Ministry for the Environment
PO Box 10362
Wellington 6143

2 June 2022

Re: Te Tai Tokerau Joint Climate Change Adaptation Committee Submission on The Draft National Adaptation Plan

Tēnā koe,

In 2021 the Councils of Te Tai Tokerau Northland, with the agreement of tangata whenua representatives, formed the Joint Climate Change Adaptation Committee (the Committee). The Committee comprises equal representation of Elected Members from each of the Northland Councils and nominated tangata whenua representatives from within the respective Council boundaries. The Committee is a joint standing committee of Council under Clause 30(1) of Schedule 7 of the Local Government Act 2002 (LGA) and operates in accordance with the provisions of Clause 30A of the LGA.

As per its Terms of Reference the Committee has a responsibility to 'Act collectively as an advocate for climate change adaptation generally and within the individual bodies represented on the Committee.'

The Committee thanks the Ministry for the Environment (the Ministry) for the opportunity to provide feedback on the draft National Adaptation Plan (NAP). Please accept this joint submission on behalf of the Committee and the Northland Councils (the Councils):

- Northland Regional Council
- Far North District Council
- Whangarei District Council
- Kaipara District Council

We acknowledge the work involved in collating the vast extent of climate change adaptation initiatives across all of government and we welcome the added value this delivers. As a result, the draft plan is comprehensive and requires considerable time investment to accurately evaluate its content.

The limited time to prepare submissions has constrained the ability of the Council's elected representatives and staff to substantively engage with tangata whenua and the Councils' constituents and participate in informed debate over the content of the draft plan and its potential implications for the residents and ratepayers of Te Tai Tokerau. This is an unsatisfactory outcome considering the importance of a National Adaptation Plan to Aotearoa New Zealand communities.

The Committee appreciates the draft NAP is a big step towards setting an 'adaptation vision.' It is ambitious in scope and lays out a substantial work programme across a broad field, touching on many government departments.

Te Tai Tokerau Climate Adaptation Strategy has been adopted by the Councils and endorsed by the Committee. As such, the Councils are already determining their own roles and responsibilities when it comes to adapting to climate change including how to support tangata whenua to undertake their roles and responsibilities.

The Councils are aligned in our strategic and implementation planning on climate change adaptation.

Te Tai Tokerau Climate Adaptation Strategy is principled on working collaboratively with tangata whenua, demonstrating the principles of partnership, participation and protection.

The Committee requests the Ministry, through the consultation process, review and consider Te Tai Tokerau Climate Adaptation Strategy: catt.org.nz

Staff from across the Councils contributing to this submission compared the draft NAP and the consultation document on Managed Retreat with Te Tai Tokerau Climate Adaptation Strategy, asking:

- Does the draft plan support resilience in Northland?
- Does the draft plan enable preemptive actions to reduce risk?

The following items cover the key areas of feedback we want to emphasise from a Te Tai Tokerau perspective. Please also refer to our question-by-question response for our detailed submission.

Consultation process and method

The layout of the consultation documentation across two documents and how the managed retreat content was included, was confusing even for staff well-versed in policy making. It is unlikely to be comprehensible to the public.

The consultation document and the draft plan does not meet the principles of clear drafting.¹

The purpose of the managed retreat consultation is also confusing and slightly derailing because it is not included in the plan as a section. The overall consultation process felt somewhat ad-hoc and underdeveloped.

Ambiguity and lack of a substantial plan

The draft plan leaves room for too much flexibility. It runs the risk of continued ad-hoc and unaligned adaptation actions. Too many actions rely on a new plan or new policy being developed by the government, meaning it is difficult to see the complete picture. This issue is most pronounced in the System-wide actions section, where the draft plan reads like a summary of current government reform programmes, with a tenuous and high-level connection to climate change adaptation.

¹ Parliamentary Counsel Office Drafting Manual, Chapter 3: <http://www.pco.govt.nz/clear-drafting/>

Some of the key components and areas seeking feedback should already be defined or set and the actual consultation should be clear steps ahead. This is not evident in the draft.

The draft plan only defines roles and responsibilities at a high level. It needs to go a step further and define roles and responsibilities in relation to climate change adaptation implementation and funding. Although organisation owners are identified for each action, the activation and implementation roles are undeveloped and too vague.

The plan needs to provide clear guidance about managed retreat: how the process and implementation of managed retreat is best undertaken and who should take the lead. Using rates as a funding mechanism is not appropriate or equitable. Communities and councils are already under extreme financial pressure.

There is a real drive in Te Tai Tokerau for communities particularly within marae, hapū and iwi to lead and self-determine their response to climate change. The Committee acknowledges the objectives of the Communities Section of the draft NAP and encourages the Ministry to put communities at the heart of making managed retreat decisions.

The draft appears to rely on government reform programmes to deliver on the vision, purpose and goals of a climate-resilient New Zealand without any detail on how these will be achieved via these 'in progress' programmes.

The draft lacks acknowledgement of the disproportionate impacts on tangata whenua and must show how mātauranga Māori will be built into adaptive planning principles and processes.

Funding mechanisms and funding roles and responsibilities

The draft NAP reaffirms the significant role local government and tangata whenua play in adaptation planning and its implementation but fails to clearly identify funding mechanisms to support these roles. For local government, the extent of funding required for climate change adaptation is not possible under existing funding arrangements which primarily relies on ratepayers. Central government needs to investigate alternative funding avenues for local government and tangata whenua roles and responsibilities that will not place an additional burden on ratepayers.

The draft NAP is focused on central government agencies. It does not fully articulate the nature of the partnership with local government, nor does it lay out a strong pathway for local government. Central government needs to work with local government to understand the information needs, decision-making nuances and funding constraints tied to providing infrastructure where the risk of natural hazards and climate change is already significant.

The NAP should be more explicit in how individual actions -> community actions -> territorial authority actions -> regional council actions -> and national actions can all work to support each other. This is as true for funding roles and responsibilities as it is for policy alignment and ultimately, on the ground action which is left mostly to local government in the draft plan.

The Committee requests that agreements between agencies and local government on funding splits is included as an action in the plan.

The West Coast case study could set a precedent/benchmark. For example, the Climate Emergency Response Fund (CERF) could be made available to local government to submit business cases for resilience investment (p.39).

The interaction of local government's roles as service provider and resource allocation authority needs to be better laid out in the plan.

Monitoring and reporting

It is unclear why the draft NAP accounted for only 10 of the 43 risks identified in the National Climate Change Risk Assessment (NCCRA). Furthermore, it is unclear why the draft NAP splits the 10 risks evenly across domains in the NCCRA. Some domains scored higher in urgency and significance, for example health and disruption risks (H3 and H4). These domains should be given higher consideration. The draft NAP should clearly identify how it intends to address other 'urgent' risks.

For each outcome area, the draft NAP should identify explicit indicators and measures of progress and success. These indicators and success measurements should be at the beginning to frame the outcomes and actions.

A detailed, robust monitoring and evaluation system will be critical across all risks to ensure appropriate focus of our interventions. This will be particularly important as the climate changes, potentially in unexpected ways and our society adjusts – reflected by changing values and preferences. This is recognised in the NCCRA as cascading impacts, interdependencies and the like and how these issues should be considered in future assessments.

Vulnerability and Equity

The draft NAP recognises that basing decision-making on a purely risk-based system will exacerbate existing inequity and vulnerability. Vulnerability should be put at the heart of the NAP. Currently this resides exclusively in the 'human or communities domain' as identified by the NCCRA.

The definition of vulnerability must be clarified in the NAP. Under the research themes section of the draft NAP, it reverts to a narrow understanding of vulnerability and the term is applied when discussing physical assets. We recommend clarifying the use of the term 'vulnerability' and applying a deeper understanding of vulnerability as adopted by the United Nations through the Intergovernmental Panel on Climate Change and the Sendai Framework for Disaster Risk Reduction which are both referenced in the draft NAP.

A deeper understanding of vulnerability will unlock significantly greater investment to address inequity, poverty reduction, health, economic drivers. This could open more pathways and opportunities for adaptation.

The draft NAP has a principle of promoting equity defined as helping the people, places and infrastructure that are most vulnerable to climate impacts, while building adaptive capacity for all. The Committee requests that more certainty be included in the NAP on how equity will be measured and tracked on a place by place, region by region basis.

The Committee requests an affordability scale be included in any measure of equity that is used and referenced in the NAP.

Te Tai Tokerau is explicitly mentioned in the draft NAP as being subject to more frequent ex-tropical storms, more hot days, longer more intense periods of drought and prone to more frequent and intense wildfires. Te Tai Tokerau already scores lowly in socio-economic measures. Regional anomalies like these should be accounted for as part of a regional risk multiplier that should inform prioritisation of government funding and support if the NAP is being true to addressing equity issues in the notion of ‘no one left behind.’

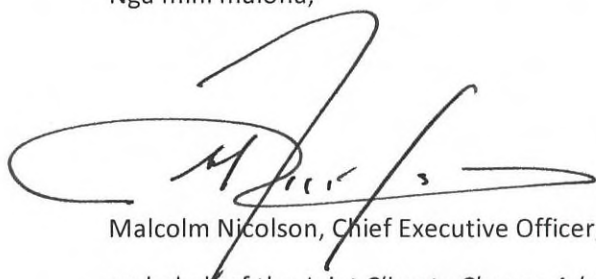
Adapting to climate change will be ongoing for decades to come. Actions taken today will have impacts far into the future impacting future generations. The Committee requests that the NAP specifically consider intergenerational equity when considering more certainty on measures of equity.

Homes, buildings, and places

The Committee supports in principle the objectives and actions in the section ‘Homes, buildings and places’. However, the Committee requests that a further objective of connectivity of places (physically and virtually) be added as climate change poses a serious threat to the connectivity between places. This connectivity provides lifelines for services and the wellbeing of communities, districts and regions.

The Northland Councils and the Committee extend a thanks again to the Ministry for the Environment for an opportunity to submit on this crucial step forward towards a climate resilient Aotearoa.

Ngā mihi maioha,



Malcolm Nicolson, Chief Executive Officer, Northland Regional Council
on behalf of the *Joint Climate Change Adaptation Committee*

Draft National Adaptation Plan

General Questions

1. *Climate change is already impacting New Zealanders. Some examples include extreme weather events such as storms, heatwaves and heavy rainfall which affects lives, livelihoods, health and wellbeing, ecosystems and species, economic, social, and cultural assets, services (including ecosystem services) and infrastructure. How is climate change impacting you? This could be within your community and/or hapū and iwi, and/or your business/organisation, and/or your region.*

Coastal Communities across Te Tai Tokerau are already experiencing erosion of beaches, dunes, and adjacent land. There is increasing pressure on local government agencies to support communities to defend and protect what they value from the impacts of adverse weather and climate change.

Weather events (intense storms, drought, wildfires) are occurring more frequently than previously experienced by those living in the region.

Council infrastructure decision-making is affected because the large projects required to manage river or coastal flood risk are not affordable to ratepayers.

Rural communities and Te Tai Tokerau agriculture sector are feeling the impacts of drought and restrictions on potable water and access to freshwater.

The draft National Adaptation Plan acknowledges that Te Tai Tokerau will feel the effects of an increase in the number of ex-tropical cyclones.

Examples of these effects include:

- Local schools in rural areas such as Whangaruru needing to close multiple times in a year due to flooding. This impacts student learning and care giver's ability to work.
- Hapū kaitiaki have shared difficulties in undertaking environmental monitoring within the moana due to disruption to seasonal changes.
- Changes in the climate impacting the ability of tangata whenua to undertake traditional practices. For example, ground water being so high they are not able to bury their whānau in coastal urupā.

Note: A comprehensive list of climate impacts is available in Te Tai Tokerau Climate Adaptation Strategy and supporting Climate Risk Overview at <https://catt.org.nz/>.

2. *The national adaptation plan focuses on three key areas. Please indicate which area is most important for you (tick box).*

- ☒ *Focus area one: reforming institutions to be fit for a changing climate. This means updating the legislative settings so that those who are responsible for preparing for and reducing exposure to changing climate risk will be better equipped.*

- ☒ *Focus area two: providing data, information and guidance to enable everyone to assess and reduce their own climate risks. This means that all New Zealanders will have access to information about the climate risks that are relevant to them.*
- ☒ *Focus area three: embedding climate resilience across government strategies and policies. This means that government agencies will be considering climate risks in their strategies and proposals.*
- ☐ *Other? Please explain.*

The Councils support all three focus areas equally.

We support focus area one and are pioneers in this space. Our experience shows that pooled resources and expertise, and a shared strategy and policy framework has benefited our assessment of climate change impacts in Te Tai Tokerau.

The Councils support focus area two but urges that there is better definition of the processes to share information, to ensure equity.

Focus area 3 relates to embedding climate change into government strategies and policies. We recommend a review of the New Zealand Coastal Strategy so that it aligns with the NAP workstream. We also recommend this focus area gives equal weight to adaptation and mitigation. For example, identifying nature-based solutions that address both aspects of our response to climate change.

3. *We all have a role to play in building resilience to climate change, but some New Zealanders may be more affected and less able to respond. There is a risk that climate change could exacerbate existing inequities for diverse groups in society. Appendix 3 sets out the full list of actions in this National Adaptation Plan.*

a) What are the key actions that are essential to help you adapt? Please list them.

The Councils have identified the following key actions needed to support adapting to climate change:

- SW1 - Pass legislation to support managed retreat and support with statutory guidance.
- SW2 - Provide access to the latest climate projection data
- Develop 3D coastal mapping
- SW3 - Deliver a rolling programme of targeted guidance.
- Robust co-investment policies (like what is being explored for flood risk reduction and climate adaptation for the Westport community).
- I3 - Develop a climate change resilience standard or code for infrastructure.

b) Which actions do you consider to be most urgent? Please list them.

- SW1 - Modernise the emergency management system
- SW2- Design and develop an Adaptation Information Portal
- SW3 - Public investment in climate change initiatives
- HBP3 - Partner with iwi to facilitate through iwi management plans.

- Complete case study to explore co-investment for flood protection (Westport). Further action would be required to turn this into a co-investment policy
 - HBP1- Build property resilience
 - HPB1 - Establish an initiative for resilient public housing
 - HBP1 and HPB2 - Embed adaptation in funding models for housing and urban development, and Māori housing
 - All supporting actions and future work programme proposals under the Homes, Buildings and Places objective
- c) *Are there any actions that would help ensure that existing inequities are not exacerbated? Please list them.*
- SW1 -Pass legislation to support managed retreat
 - SW2 - Provide access to the latest climate projections data
 - SW1 – Establish a foundation to work with Māori on climate actions
- d) *Are there any actions not included in this draft national adaptation plan that would enable you to assess your risk and help you adapt?*
- Funding for implementing climate change adaptation actions. A clear plan for supporting and increasing flood management investment with the Councils, including how this works in the longer-term adaptive pathways planning process.
 - A case study on the changing risk profile for drought in Te Tai Tokerau due to climate change
 - Further research on the possibility of increased frequency and strength of events (e.g., hot days, ex-tropical cyclones, heavy rainfall) and what that would mean for Te Tai Tokerau.
 - Better understanding for councils of the erosion or accretion of specific coastal areas - like the NZ Sealevel work - to assess actual risk to communities.
4. *Central government cannot bear all the risks and costs of adaptation. What role do you think asset owners, banks and insurers, the private sector, local and central government should play in:*
- a) *improving resilience to the future impacts of climate change?*
- This is a national issue. Central Government needs to lead this change via stronger regulations and policy. Potentially this could be incorporated into a national direction rather than relying on individual hazard rules in district plans. The RMA (Resource Management Act) reform is an opportunity to address this.
- b) *sharing the costs of adaptation?*
- The burden of risk should be distributed across central government, local government, banks, and insurers. This risk distribution should be written into legislation and underwritten by central government via legislation. This protects private property

owners, while ensuring that government agencies, banks and insurers are protected from the actions of private property owners.

A private finance initiative could work, particularly in coastal areas with complex infrastructure.

The Three Waters funding has identified resilience as a key outcome. Central government needs to work with local government to ensure that this funding proactively supports climate adaptation and risk reduction.

5. *The National Climate Change Risk Assessment recognised that there may be economic opportunities in adapting to a changing climate.*

a) *What opportunities do you think could exist for your community or sector?*

There is alignment with the Emissions Reduction Plan, in which local economies benefit from carbon sequestration. Examples include:

- Creating blue carbon sinks along the coast of Te Tai Tokerau and within large wetlands such as the Hikurangi repo. These could also serve as marine reserves and tourism/fishing destinations.
- Transitioning economies away from high-emissions agriculture and re-establishing earlier industries such as tuna.
- Phasing out the plantation forestry industry and phasing in regenerating indigenous forests.
- Nature-based tourism opportunities for Te Tai Tokerau.

b) *What role could central government play in harnessing those opportunities?*

There has been discussion around increased hot days, longer dry periods that could enable more tropical and sub-tropical crops. However, it is assumed this will be offset by the decline in other crops being no longer viable due to these same environmental conditions. Central government could fund investment in research of what the changing climate means for crops in Te Tai Tokerau.

Central government could support local government, through improved funding, to focus on localism/place-making and to facilitate community-led adaptation planning.

Central government could address the Act of Parliament regarding funding of Hikurangi Drainage Scheme, the drainage schemes in Te Hiku and the Raupō Drainage System which reduces funding options for the scheme.

System-wide actions

6. *Do you agree with the objectives in this chapter?*

☒ Partially

Please explain your answer

The objectives of the chapter are implied, but not clearly stated. We would like the Ministry to state the objectives more clearly, provide a plan that is structured logically and articulates relationships between different tools/legislative instruments. In

particular, the changes coming from the reform of the resource management system and the reform of institutional arrangements for water services (three waters) must be clearly articulated in the NAP on how these contribute to achieving the vision, purpose, and goals of a climate-resilient New Zealand.

7. *We agree that we need to minimise the risks of maladaptation however some of the regulatory changes identified can be worked around by better integration across agencies. The communities are requiring action now. Waiting for the completion of a regulatory change increases the discontent of our communities. The fourth objective of unlocking the investment in climate change is critical to enabling all agencies to provide solutions that are financially viable. The Hawkes Bay case study has found their work programme stymied due to a lack of discussion around funding. What else should guide the whole-of-government approach to help New Zealand adapt and build resilience to a changing climate?*

We require resource to enable the Councils to achieve their land management and flood risk management – either through professional or collaborative development support.

The misalignment between objectives in other government planning documents makes it exceedingly difficult. For example, the objectives of the NPS – Urban Development aim to intensify development, which stands in opposition to the requirements of the national policy statements for freshwater management, indigenous biodiversity, natural hazards and now climate change.

A whole of government approach needs to be integrated into all national guidance.

8. *Do you agree that the new tools, guidance, and methodologies set out in this chapter will be useful for you, your community and/or iwi and hapū, business or organisation to assess climate risks and plan for adaptation?*

☒ **Partially**

Please explain your answer.

All government departments need a review as opposed to a focus on local government. Many government departments and the legislation they work under do not function holistically and deliver conflicting outcomes for communities.

9. *Are there other actions central government should consider to:*

a) *enable you to access and understand the information you need to adapt to climate change?*

☒ **Yes**

Please explain your answer.

A government-funded central data source to undertake local modelling would assist in adapting to climate change. Access to information to best adapt to climate change is still lacking in areas and it is costly to obtain the information required at a local level. Many smaller local authorities, communities and iwi/hapū groups do not have funding to create or access this information. The coordination and provision of data at the level required for local decision making would support us to make good decisions.

b) *provide further tools, guidance, and methodologies to assist you to adapt to climate change?*

☒ Yes

Please explain your answer.

Continuing improvement of current tools such as risk assessment guidance, adaptation planning frameworks and templates.

c) *remove barriers to greater investment in climate resilience?*

☒ Yes

Please explain your answer.

Need much clearer mechanisms for funding.

Need clearer identification of roles and responsibilities.

d) *support local planning and risk reduction measures while the resource management and emergency management system reforms progress?*

☒ Yes

Please explain your answer.

The draft plan should better address land-use planning barriers, outline roles and responsibilities of all government agencies and manage the transition from RMA to the Natural and Built Environments Act and Climate Adaptation Act. The draft plan is too high level and reads more like a summary of current legislative changes.

The draft plan needs to clearly articulate how it integrates with the Three Water Reforms.

10. *What actions do you think will have the most widespread and long-term benefit for New Zealand?*

- Pass legislation to support managed retreat.
- Establish a foundation to work with Māori on climate actions-- Recognise tino rangatiratanga and mana whenua role as partners in adaptation planning and local solutions. Work with iwi and hapū to embed culturally appropriate safeguards in adaptation planning and action process to ensure that colonisation is not perpetuated through 'managed retreat' approaches.

11. *Are there additional actions that would strengthen climate resilience?*

☒ Unsure

Please explain your answer.

There are several Government reform programmes underway that can address some barriers to adaptation, including the Resource Management (RM) reform. Are there any additional actions that we could include in the national adaptation plan that would help to address barriers in the short-term before we transition to a new resource management system?

Review effectiveness of central government agencies in serving needs of regional and local communities, marae, iwi and hapū.

In Te Tai Tokerau, the Climate Adaptation Te Tai Tokerau working group and Joint Climate Adaptation Committee is a potential vehicle for a regional review.

12. There are several Government reform programmes underway that can address some barriers to adaptation, including the Resource Management (RM) reform. Are there any additional actions that we could include in the national adaptation plan that would help to address barriers in the short-term before we transition to a new resource management system?

Councils need support towards identifying and managing transitional risks and governance risks. This includes support with transition to zero carbon ways of working and potential future costs for emissions. Central government could release further guidance on how to identify, prioritise and address transitional risks to supplement 2021 local climate change risk assessment.

Bring forward the production of an adaptation professional development programme for key practitioners (currently proposed for Years 4-5, 2025-2027)

13. In addition to clarifying roles and providing data, information, tools, and guidance, how can central government unlock greater investment in resilience?

a) *Would a taxonomy of 'green activities' for New Zealand help to unlock investment for climate resilience?*

☒ Yes

Please explain your answer.

Yes, it would be useful to understand what green initiatives are being used and to have a common taxonomy within the local government planning framework. This should cover nature-based solutions and stormwater controls.

The natural environment

14. Do you agree with the actions set out in this chapter?

☒ Yes

Please explain your answer.

Overall, we support the actions in this chapter. However, it is weak in the marine domain and needs to better factor in the National Policy Statement on Indigenous Biodiversity.

We support the action "Implement the Water Availability and Security programme". It must have strong regional council representation and be used to foster storage and ground water recharge. Central government support and direction is required to manage changes to primary sector land use to achieve more climate resilience.

We support the action “Implement the Sustainable Land Management Hill Country Erosion Programme.” This is the kind of practical step that supports rural resilience. We would like more information about how this will be rolled out and the organisations who will be able to access support from this programme.

15. *What else should guide central government’s actions to address risks to the natural environment from a changing climate?*

Establish a framework of marine protected areas so that at least they are restored to a healthy, diverse state that is resilient to climate change.

16. *Are there other actions central government should consider to:*

- a) *support you, your community, iwi and hapū, business and/or organisation to build the natural environment’s climate resilience?*

☒ Yes

Please explain your answer.

Councils support bringing forward the development of mātauranga Māori indicators of climate impacts on the natural environment – the lead agency should be MfE (Ministry for the Environment).

Work more with the regional sector, e.g. SIG network in the support action work and implementing its actions and providing resources to undertake the work

- b) *strengthen biosecurity in the face of climate change?*

☒ Yes

Please explain your answer.

There are more tools and resources that are needed to support local government to achieve outcomes on private land, particularly retired pasture, and farmlands.

Need to expand marine protected areas. Healthy and diverse marine eco-systems are also more resilient but the CMA in Te Tai Tokerau has <1% marine protection

- c) *identify and support New Zealand’s most vulnerable ecosystems and species in a changing climate?*

☒ No

Please explain your answer.

Actions are mostly limited to the DoC CCAAP (Climate Change Adaptation Action Plan) but this has a limited scope, and is weak for private land and where there is no network of marine reserves.

17. *What do you identify as the most important actions that will come from outside of central government (e.g., local government, the private sector or other asset owners, iwi, hapū and/or other Māori groupings such as: business, forestry, fisheries, tourism, urban Māori, the private sector) to build the natural environment’s resilience to the impacts of climate change?*

Without incentives or resources, additional actions are unlikely to achieve meaningful outcomes. Most important action(s): a means of recognising the resilience provided by different natural environments, linking climate change and resilience outcomes with biodiversity outcomes and actions.

18. *Are there additional actions that would advance the role of Māori as kaitiaki in a changing climate?*

☒ Yes

Please explain your answer.

Establish funding resources and programmes to increase capacity and resourcing (empowerment) for hapū to monitor environmental health and provide a role in managing outcomes (co-management).

Homes, buildings, and places

19. *Do you agree with the outcome and objectives in this chapter?*

☒ Yes

Please explain your answer.

The objectives of this chapter align with the thinking around placemaking that is behind the Future of Local Government stream of work that is part of the wider reform programme.

20. *What else should guide central government's actions to increase the resilience of our homes, buildings, and places?*

The connections between places (physical via transport networks, virtual via telecommunication services) are as important as the places themselves. These are lifelines and critical to the wellbeing of all communities. This should be covered in the Transport Chapter: however, the viability of place will be impacted by how connected a place is to other places.

Making homes, buildings, and places resilient to the changing climate will result in added cost to home and building owners and to the communities that inhabit places. Affordability must be addressed for those most impacted and vulnerable.

21. *Do you agree with the actions set out in this chapter?*

☒ Yes

Please explain your answer.

Resilience for homes, buildings and place is just as much about the built environment that connects these buildings. This is relevant to the regional land transport and passenger transport plans prepared by regional Councils.

22. *Are there other actions central government should consider to:*

- a) *better promote the use of mātauranga Māori and Māori urban design principles to support adaptation of homes, buildings, and places?*

☒ Yes

Please explain your answer.

The plan must look to existing te ao Māori and mātauranga Māori models and frameworks already being developed. For example, Te Aranga Design Principle and the development of a decision-making framework for the Councils is in development as an action item resulting from Te Tai Tokerau Climate Adaptation Strategy

The trust and partnership between local government and hapū or iwi needs to be there as a foundation before any use or promotion of design principles.

- b) *ensure these actions support adaptation measures targeted to various places and respond to local social, cultural, economic, and environmental characteristics?*

☒ Yes

Please explain your answer.

There will be localised issues that will be exacerbated by climate change. Some baseline nationwide wellbeing measures must be developed that include connectivity. Otherwise, there will be parts of Aotearoa that will be left behind.

- c) *understand and minimise the impacts to cultural heritage arising from climate change?*

☒ Unsure

Please explain your answer.

There needs to be investment in the capture and access to information and data on culture and heritage. This work needs to be in partnership with central government, Heritage NZ, local government, and iwi and hapū. This is potentially a significant amount of work that will require resourcing.

The following questions are about existing buildings. These can include housing, communal residential (hotels, retirement village), communal non-residential (church, public swimming pools), commercial (library, offices, restaurant), industrial (factory, warehouse).

23. *Do you think that there is a role for government in supporting actions to make existing homes and/or buildings more resilient to future climate hazards?*

☒ Yes

If yes, what type of support would be effective?

Provide property owners with financial support to bring buildings up to a resilient standard.

24. *From the proposed actions for buildings, what groups are likely to be most impacted and what actions or policies could help reduce these impacts?*

Building owners, users of buildings, customers of service providers, people connected to communities and the land via the buildings and built environment.

Housing impacts will disproportionately affect smaller communities and communities and families already struggling with low incomes. This can be addressed by a regional approach in which resources are shared among the Councils in the region. This regional approach would require increased central government resource.

25. *What are some of the current barriers you have observed or experienced to increasing buildings' resilience to climate change impacts?*

Building and compliance costs at a local level.

Most developers focus on profit and do the minimum to mitigate natural hazards or risks. District Plans (Rules) should be more stringent (restrictive/prohibitive) about building in zones that are susceptible to natural hazards and the impacts of climate change.

Infrastructure

26. *Do you agree with the outcome and objectives in this chapter?*



Partially

Please explain your answer.

We want our infrastructure to be resilient to a changing climate, so that it protects or enhances the wellbeing of all New Zealanders.

The Councils support the outcomes and objectives in this chapter; however, this could go further to recognise the role of infrastructure in reducing emissions and protecting other assets such as social infrastructure and communities.

Much of the infrastructure affected by climate change is currently under the authority of local government. The expectation that our infrastructure is resilient to a changing climate is made without understanding the costs of achieving this for our communities.

The Draft Adaptation Plan does not provide enough detail on how Councils are to fund these additional costs. Regions such as Te Tai Tokerau have a significant coastline, as well as being exposed to a range of climate change impacts from drought, storms and fluvial flooding. To enable equitable access to adaptation actions, additional support and funding will be required.

There is conflict with the New Zealand Coastal Policy Statement which makes any adaptation actions (except retreat) difficult to achieve under current policies, with no allowance for the needs of the urban landscape.

In addition, further work is required to determine how the responsibility for climate adaptation will be managed with the transfer of the three waters infrastructure responsibilities.

- **Objective 1**

The Councils partially support this objective. We are concerned this opens the way for additional reporting requirements in areas such as quantifying amount of exposed network infrastructure, or dollar value of exposed infrastructure. Headline figures like these may grab readers' attention but are of little use to infrastructure planners.

Additional reporting requirements need to be well thought out to ensure they are not too onerous for Council staff.

Pulling these figures together and reporting on them regularly can be a costly exercise in terms of staff time – a cost born by the ratepayer or user. The requirements for this type of reporting where assets are not operated by local authorities will also need to be clearly set out in the plan.

- **Objective 2**

The Councils support this objective. Local Government already takes climate change into consideration when planning new infrastructure, for example, ensuring that stormwater pipes have capacity for greater intensity rainfall events. Government can support us by providing guidance on which climate projections to use in our planning assumptions. It is not efficient for each council to debate and justify with its communities why they have chosen to assume one set of climate projections over another.

For example, when designing new stormwater pipes and factoring in climate change, we want to extrapolate rainfall data for that catchment by a set percentage to account for climate change.

Additional data provision provided under Focus Area Two will be key in this regard.

- **Objective 3**

The Councils support this objective.

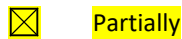
27. *What else should guide central government's actions to prepare infrastructure for a changing climate?*

Ahead of each local government long term planning cycle, which should link to Waka Kotahi and the three waters entity planning cycles, Government should release a standard set of climate change planning assumptions for New Zealand. This should give direction on how much evaporation is projected to increase, how much total rainfall is projected to decrease, how much peak intensity rainfall is projected to increase etc.

The report should be sufficiently detailed to allow for variances in different regions, districts and even catchments. A good example is [Climate Change Projections and Implications for Te Tai Tokerau](#).

Maps showing how climate change projections differ across areas are particularly helpful.

28. *Do you agree with the actions set out in this chapter?*



Please explain your answer.

- [Develop a methodology for assessing impacts on physical assets and the services they provide](#)

The Councils support this action. Managing risk is already a core part of planning and operating our infrastructure. What we need from central government is a clear understanding of standards for climate scenarios. For example, knowing what climate change projections to use in our planning assumptions when assessing risks associated with different infrastructure options.

Councils are concerned that any methodology for impact assessments will result in time intensive reporting exercises. If this action is to be pursued, any reporting requirements should be based on information already collected and reported to avoid additional work.

- [Scope a resilience standard or code for infrastructure](#)

The Councils support this objective in principle. There needs to be a clear relationship with local authority engineering standards, or integration into engineering standards requirements, so there is one set of requirements for providers. The code must provide for different infrastructure options that are affordable. Local authorities do not necessarily have equal access to afford specific infrastructure. For example, stonework sea walls versus revetments.

- [Integrate adaptation into Treasury decisions on infrastructure](#)

The Councils support this objective.

- [Develop and implement the Waka Kotahi Climate Change Adaptation Action Plan](#)

The Councils support this objective in principle. This is critical for Te Tai Tokerau as it is a rural area with dispersed communities that are highly dependent on state highways for their mobility. For example, SH12 and SH14 are the main thoroughfares in the Kaipara District as well as SH1 and SH15 through Whangarei. All are highly exposed to a range of climate hazards including coastal flooding and river flooding but there is uncertainty on Waka Kotahi actions and priorities.

Any plan developed for Waka Kotahi needs to have clear requirements and clear commitment to aligning with any adaptation plans or strategies that come from local government and communities' dynamic adaptive pathways planning. The plan would also need to fit in with spatial planning processes and future regional spatial plans that are signalled under RMA reform. Local government and tangata whenua should be engaged early in the development of this plan.

- [Manage dry-year risk through the New Zealand Battery Project](#)

This falls outside the scope of what we as local government should comment on as it relates to energy infrastructure which we are not responsible for delivering.

- [Encourage and support the evaluation of climate-related risks to landfills and contaminated sites](#)

The Councils support this objective. We would like to see more explicit action rather than support, for example, assistance in determining the impact of site-specific risks and what adaptation actions are required. Councils have inherited many historic landfill sites with little background information. Councils will require assistance in the development of assessment tools. The current action is not specific enough for Councils to rely on in their business plans or future work programmes.

- [Explore funding options to support the investigation and remediation of contaminated sites and landfills vulnerable to the effects of climate change](#)

The Councils support this objective. This is critical for small to medium coastal Councils like Kaipara District Council.

- [Integrate adaptation into Waka Kotahi decision making](#)

The Councils support this objective. We assume that this will work under the Waka Kotahi Climate Change Adaptation Action Plan discussed above. Integration between local planning and Waka Kotahi is critical to Te Tai Tokerau Councils and their communities for their long-term resilience.

- [Progress the rail network investment programme](#)

The Councils support this objective in principle, as it relieves pressure on the roads Te Tai Tokerau Councils maintain, particularly from heavy freight.

- [Invest in public transport and active transport](#)

The Councils support this objective in principle. This is part of our Infrastructure Strategies and Regional Land Transport Plan. Investment is required to ensure options are available to more sectors of our region. Investment in active transport needs to ensure climate change adaptation is considered in investments, for example, using river stopbanks and esplanades to develop walking and cycling networks. These areas are often exposed to climate risks such as coastal and fluvial flooding.

- [Increase uptake of tools to invest in infrastructure in urban areas](#)

The Councils support this objective in principle. Identification of the barriers to the uptake of tools needs to be undertaken prior to determining how to improve the use of the tools.

- [Support the integration of climate adaptation and mitigation in new and revised standards](#)

The Councils support this objective in principle. Further information is required on whether the standards are to be national standards and mandatory to be implemented, and for who.

- [Develop the National Energy Strategy](#)

The Councils support this objective in principle.

29. *The national adaptation plan has identified several actions to support adaptation in all infrastructure types and all regions of Aotearoa.*

d) *Do you see potential for further aligning actions across local government, central government, and private sector asset owners?*

☒ Yes

Please explain your answer.

The Councils support this direction. Integration and aligning actions are critical to create a consistent approach to climate adaptation. It is important to note that there are already examples of excellent alignment across local and central government and private sector asset owners (such as electricity and gas network providers) through initiatives such as lifelines and emergency management.

There needs to be clarity on who leads this coordination both on the macro and local scale. Having aligned strategies and spatial plans, including projects like Te Tai Tokerau Region-wide Climate Adaptation Strategy will help.

e) *Do you see any further opportunities to include local mana whenua perspectives and mātauranga Māori in infrastructure adaptation decision-making?*

☒ Yes

Please explain your answer.

The Councils believe there are always further opportunities to include local mana whenua. The Councils see mana whenua as a partner in our adaptation decision making, including infrastructure.

In general, the Councils have effective working relationships with Mana Whenua that we can continue to build on. Mana Whenua input on infrastructure adaptation decision-making can occur through community adaptation planning / DAPP (Dynamic Adaptive Pathways Planning) process.

Many hapū in Te Tai Tokerau are limited by insufficient capacity and insufficient resourcing. This is a priority to be addressed through strong funding and capacity building mechanisms.

f) *Do you see any further opportunities to include local community perspectives in infrastructure adaptation decision-making?*

☒ Unsure

Please explain your answer.

The Councils believe there are always further opportunities to include communities in our adaptation decision making, including infrastructure.

We already have effective ways of engaging with our communities on infrastructure planning. Flexibility and choosing the right engagement approach are key. Local councils are a vehicle for communities to collectively fund their shared infrastructure needs. Some communities may want to use their council to fund extensive climate adaptation works via a targeted rate. Other communities may not be able to afford such works and may choose

managed retreat. The ability to manage this inequity is a key element in managing an adaptation planning process. Still others may not be facing the same threats. This flexibility for each community to make their own informed decisions needs to be retained.

- g) *Do you see any further opportunities to ensure that groups who may be disproportionately impacted by climate change, or who are less able to adapt (such as those on low incomes, beneficiaries, disabled people, women, older people, youth, migrant communities) have continued and improved access to infrastructure services as we adapt?*

☒ Yes

Please explain your answer.

A community's location or economic status should not dictate their ability or options for adaptation. The National Adaptation Plan needs to address how this inequity is to be managed and funded.

For councils, this relates to unequal impacts on wellbeing and the affordability of local adaptation projects in more deprived communities, the affordability of rates/targeted rates and who pays. It might be possible to introduce a funding mechanism to include an adaptation action contribution. This adaptation action contribution could be ring fenced for adaptation needs for those disproportionately impacted. Ideally this would be a regional policy supported by a national standard.

- h) *Do you think we have prioritized the right tools and guidance to help infrastructure asset owners understand and manage climate risk?*

☒ No

Please explain your answer.

The focus seems to be on quantifying the amount of infrastructure at risk and understanding the risks faced. Council asset managers already have a good understanding of both quantity and risk and are commissioning investigations into specific pieces of infrastructure where we have concerns or known knowledge gaps.

What we need is a clear understanding of what climate change planning assumptions to use to better inform decision making (as explained previously). We would also like to see more affordable modelling tools made available that can enable smaller Councils to access these services more easily.

30. *Are there additional infrastructure actions that would help to strengthen Māori climate resilience?*

☒ Yes

Please explain your answer.

In Te Tai Tokerau, many Māori communities are concentrated in rural areas. These areas struggle for infrastructure services and the resilience of infrastructure generally – partly due to their unstable geology and high rainfall, and partly due to small ratepayer base, and limited ability to pay higher rates. These communities are reliant on transportation networks (local and state highway) and therefore local and national infrastructure investments.

In addition, support and funding is required to implement alternative infrastructure such as water supply and electricity. Prioritising actions to assist and support investments in regional infrastructure will assist with this.

31. *Are there any other tools or data that would help infrastructure asset owners make better decisions?*

From a local government infrastructure perspective national guidance on climate change assumptions is the key element to assist in better decision making. This would include guidance on how best to consider and account for cascading and secondary impacts. We would also benefit from climate scenarios, hazards modelling tools or funding support to access these tools so that district Councils can plan appropriately and are not dependent on external consultants or regional council funding.

Communities

32. *Do you agree with the outcome and objectives in this chapter?*

☒ Partially

Please explain your answer.

- **Communities are able make decisions and put resources into suitable adaptive actions.**

The Councils support this objective in principle but the outcome needs to shift the focus to resourcing. Communities need to be sufficiently resourced to make decisions and undertake suitable adaptive actions. A stronger community empowerment approach to resourcing needs to lead to specific actions on community-led, community-owned, community-delivered adaptation.

This outcome needs to recognise that small local authorities have limited funds to undertake extensive programmes required to actuate community empowerment. Insufficient resourcing means Councils cannot facilitate more participatory, community-empowering engagement to make decisions on suitable adaptive action. Insufficient resourcing also means resulting adaptation actions are not currently funded.

For example, all Te Tai Tokerau Councils are already initiating DAPP (Dynamic Adaptive Pathways Planning) processes to enable community decision-making and suitable actions. Because of the resource requirements Te Tai Tokerau Councils are planning for one community adaptation plan in a finite area of the district per 3-year Long Term Plan cycle, This will mean a 30-year programme to undertake planning in all affected communities. Councils. For example, Kaipara District is facilitating DAPP process for only the Ruawai-Raupō area, within the entire exposed coastal area of the West Coast, Kaipara Harbour and Southern Wairoa River.

- **Government work programmes are focused on ensuring no one is left behind.**

The Councils support this objective in principle but are uncertain about how this outcome fits with outcomes and actions from other sections chapters, such as current legislative responsibilities, and roles and responsibilities of individual property owners.

Further clarification is required on the commitment to funding this outcome. This outcome needs to include intergenerational equity considerations. The actions in this chapter do not clearly demonstrate that intergenerational equity is a guiding element of this outcome.

- **Local knowledge, including mātauranga Māori, is valued.**

The Councils support this objective in principle. However, the term 'valued' is vague and non-committal. This may go against the final principles of tino rangatiratanga.

- **Decision making is transparent and builds and maintains trust.**

The Councils support this objective.

- **Decisions support the tino rangatiratanga (self-determination) of Māori.**

The Councils support this objective in principle. However, the term 'support' is a vague and non-committal term. We need to see stronger commitment in the language used in this outcome such as 'uphold,' or 'actively and genuinely adhere to.'

33. *Do you agree with the actions set out in this chapter?*



Partially

Please explain your answer.

Raise awareness of climate-related hazards and how to prepare

The Councils support this action. It is acknowledged that there has been expensive work undertaken to identify hazards. A consistent location for the information and guidance in accessing and interpreting the information would be a key outcome of this action. The principle of 'build back better' should also be investigated and integrated into preparing and responding to hazards.

- **Develop Health National Adaptation Plan (HNAP)**

The Councils support this action. Clarification is needed on the input required from tangata whenua. Clarification is also sought regarding how the Health National Adaptation Plan will be integrated into Te Mana Hauora Māori / Māori Health Authority.

- **Improve natural hazard information on Land Information Memoranda (LIM)**

The Councils support this action. Support is required to ensure natural hazard information is robust and that legal action is minimised such as in the Kapiti Coast case. Further details are required to understand if this a standalone action, or a supplemental benefit of actions under the data, information, and guidance focus area. This is also a key part of local authority work in regional hazards mapping requirements and related district plan rules under the existing RMA. Currently councils map hazards related to their areas.

There is concern around funding, resourcing, and cost implications for the Councils (and therefore ratepayers) if mapping is set at a national level to cover climate hazards.

34. *What actions will provide the greatest opportunities for you and your community to build climate resilience?*

- Funding for adaptation actions.
- Continuing to overhaul the welfare system, enabling people to deal with the impacts of climate adaptation.
- Connecting communities to wider response and recovery support.
- Expanding current funding for proactive community resilience.
- Provision on funding direct to our tangata whenua communities to lead their own planning

35. *Are there additional actions central government should consider to:*

a) *support your health and wellbeing in the face of climate change?*

☒ Yes

Please explain your answer.

Explore opportunities to increase mental health support and grow access to mental health support. This will be a significant secondary impact of climate change for our rural and farming communities. Access to mental health care is not sufficient to meet this growing issue.

b) *promote an inclusive response to climate change?*

☒ Yes

Please explain your answer.

Expand climate science communication to make it more accessible to people with different cognitive needs. Could integrate this into the *Strengthen teaching and learning related to climate change* action. For example, adapt the tool developed for the NZ Sealevel rise project to meet the needs of those with different cognitive abilities.

c) *target support to the most vulnerable and those disproportionately impacted?*

☒ Yes

Please explain your answer.

Funding mechanisms are needed for tangata whenua-led adaptation actions, along with transitional support for farming communities to support the shift to lower emissions and more resilient, adaptable agriculture.

36. *What do you think are the most important actions that will come from outside of central government (e.g., local government, the private sector or other asset owners, iwi, hapū, non-government organisations, community groups) to strengthen community resilience in the face of climate change?*

- Transparency with insurance decisions and change to insurance policies to enable relocation, not rebuild, or repair in the same location.

- Funding mechanisms to support local government with adaptation actions that are determined through DAPP (Dynamic Adaptive Pathways Planning) process, or similar climate scenario-guided process with participatory community engagement.
- Hapū-led adaptation planning.
- Waka Kotahi adaptation actions / transport network adaptation planning aligned with community adaptation planning.
- Land use planning to identify areas for relocation to meet a specific community need.

37. *Are there additional actions could be included in the national adaptation plan to help strengthen climate resilience for iwi, hapū and whānau?*

☒ Partially

Please explain your answer.

No additional actions but there is a need to strengthen commitment in the identified actions and need to clarify development process.

The economy and financial system

38. *Do you agree with the outcome and objectives in this chapter?*

☒ Partially

Please explain your answer.

We support EF1 and all seven considerations in principle. We want to see stronger commitment to the first consideration: Economic activity is increasingly becoming carbon neutral, circular and climate resilient. We would like to see more integration with the emissions reduction plan and a clear link to national emissions targets.

39. *What else should central government do to realise a productive, sustainable, and inclusive economy that adapts and builds resilience to a changing climate?*

Align with Focus area two: Provide data, information, and guidance to enable everyone to assess and reduce their own climate risks and develop guidance on how to integrate transition risks (associated with emissions reductions and the move to a zero-carbon economy) with climate risk assessments and planning, including at the community scale and local economy scale.

Align with the 'Natural environment' chapter and expand support for local economies based on carbon sequestration and storage. Assistance in the identification of where there are opportunities for ecosystem restoration, carbon sequestration and storage to support activities such as nature-based tourism, resilient agriculture, or blue carbon farming.

Funding mechanisms at a regional scale that support a multi-sector approach to the transition to a zero-carbon economy.

40. *Do you agree with the actions set out in this chapter?*

☒ Partially

Please explain your answer.

- Support high-quality implementation of climate-related disclosures and explore expansion

The Councils support this action in principle as it enables greater transparency and improved climate risk considerations into local government financial planning. However, this would be a major change for small to medium councils, who are still setting up their climate risk assessments and risk management practices. This action would need support through statutory guidance to standardised disclosure, including standards on carbon pricing. Reads as very ad hoc and resources-dependent at this point.

- Design and implement the Farm Monitoring Programme to determine farm performance

This action needs to include resourcing, both in terms of tools and funding. To make this meaningful and not another 'tick box' exercise for farmers, need to sync up with freshwater monitoring, indigenous biodiversity, and significant natural requirements.

We are unclear on how this works with the amendment to RMA on emissions considerations in consents. If this falls to the Councils / local government to implement they would need to be included as partners in the design of this programme.

- Research business adaptation preparedness & provide guidance for small businesses to adapt

This action would better support community resilience if it were a support programme instead of research initiative. A strong baseline already exists for small business needs. Direct funding to the small businesses, rather than universities, CRIs or other central government agencies. Or condense the 'research' phase into one year then transition into activating the tools and support programme.

41. Are there other actions central government should consider to:

- a) support sectors, businesses, and regional economies to identify climate risks and adapt?

☒ Yes

Please explain your answer.

Stronger actions around farming and agriculture – similar comments to Communities chapter. Stronger support for transitional process, work programme and/or funding mechanism to support lower emissions, more resilient agriculture and increase carbon sequestration for local economies.

- b) promote a resilient financial system in the face of climate change?

☒ Yes

Please explain your answer.

Provide a clear connection between this plan and the circular economies strategic direction, including work programmes to strengthen this connection and enable circular economies at a local scale. This is a major gap in this chapter.

42. *What do you think are the most important actions that will come from outside of central government (e.g., local government, the private sector or other asset owners, iwi, hapū and/or other Māori groupings such as: business, forestry, fisheries, tourism, urban Māori, the private sector) to reduce the economic and financial risk they face from climate change?*

Access to professional risk assessment and risk planning services. Enterprises and businesses that can access good risk management services, particularly financial planning advice, will be much more resilient. This has potential to increase inequities and hurt local economies and Māori enterprise. Smaller businesses need access to affordable, high quality financial planning tools that integrate climate risks.

43. *Are there additional actions within the financial system that would help strengthen Māori climate resilience?*

☒ Yes

Please explain your answer.

Emissions reduction policies, both at central government and regional government levels, have the potential to disproportionately affect Māori in Te Tai Tokerau. We want to see stronger integration of adaptation, emissions reduction, and carbon sequestration goals so that Te Tai Tokerau hapū enterprises are not disproportionately affected.

44. *In the context of other risk management options (e.g., flood barriers, retreat from high-risk areas), what role should insurance have as a response to flood risk? Please explain your answer.*

Councils would like to see insurance companies increase transparency with their risk decision-making processes, including their threshold for retreat. This would enable a better managed retreat process, rather than a 'forced' managed retreat process triggered by insurance retreat.

45. *Should the Government have a role in supporting flood insurance as climate change risks cause private insurance retreat?*

☒ Yes

Please explain your answer.

Any attempt to subsidise flood risk or other natural hazard risk must incentivise risk reduction efforts across scales (household to LGA (Local Government Act) to National), this has only recently been recognised by Flood RE: and initiatives like the Community Rating System (CRS) in the USA. Where taken up the CRS has had a significant effect on flood risk reduction. However disproportionate vulnerability must be at the forefront of any new system if agreed. Not just pure, technical risk. This needs to address historic inequality and marginalisation.

- a) *Does your answer to the above question depend on the circumstances? (For example, who the owner is (e.g., low income), the nature and characteristics of the asset (e.g., residential, or commercial property, contents, and vehicles), what other risk management options are available and their cost/benefit, and where the asset is located?) Please explain your answer.*

Yes. Government support should centre around vulnerability and wellbeing considerations. As is stated in the national adaptation plan, basing decision-making on a purely risk-based system will only exacerbate existing inequity and vulnerability.

46. *If you think the Government should have a role in supporting flood insurance as climate change risks cause private insurance retreat, how do you envision the Government's role, and how is this best achieved (e.g., direct support and/or indirect support such as reducing underlying flood risk)?*

Our Councils are unsure if direct support is the best approach. We would want to see a review of EQC (Earthquake Commission) / upcoming Natural Hazards Insurance Bill and if a direct support model like this passes a stress test against future climate scenarios.

A direct, centralised model could be enhanced with indirect support to DAPP community and local government processes. This would reduce underlying risk while also meeting the high engagement required of community to support these decisions.

47. *If the Government were to directly support flood insurance:*

- a) *what is the best way to provide this direct support?*

- If there are direct support models that are already successful, integrate or adapt those, we do not need to recreate the wheel.
- We absolutely need an in-depth process, with adequate timing, where tangata whenua are asked how direct support could work for Māori.

- b) *should the Government's focus be to support availability or affordability of insurance, or both?*

Both

- c) *how should the costs of that support be funded, and by whom?*

This can only be funded from taxation. However, the government should consider how the emissions trading scheme could fund flood insurance.

- d) *what are the benefits and downsides of this approach?*

This approach would help to redirect resources and address the growing inequity and wealth gap.

It would be difficult to maintain this approach without cross party support

- e) *should this support be temporary or permanent?*

Ideally this approach would be temporary and used as a transition mechanism. It should be timebound, introduced as soon as possible, and clearly linked with managed retreat from intolerable risk areas.

It could be activated by certain triggers or specific indicators, if needed to avoid any thresholds at a community scale, like a DAPP framework.

- f) *if temporary, what additional measures, if any, do you think would be needed to eventually withdraw this support (e.g., undertaking wider flood protection work)?*

If the risk is effectively reduced or managed and/or if insurance becomes affordable due to change of situation / reduction in vulnerability. Same as above in terms of triggers/indicators/thresholds set like DAPP.

- g) *what would the risks or benefits be of also including non-residential property, such as commercial property?*

The benefits would include local economy resilience if affordability and vulnerability from a socio-economic perspective are the main points of consideration. It would need to be supported with underlying risk management and long-term adaptation actions.

- h) *what design features or complementary policies are needed so any flood insurance intervention retains incentives for sound flood-risk management (e.g., discouraging development in high-risk locations)?*

Complementary policies on evidence of risk reduction, risk management, evidence on adaptation action would be needed.

48. *How effective do you think the insurance “price signal” (for example, higher premiums or loss of insurance) is for providing incentives to reduce flood risk?*

Unsure. Risk is not necessarily understood on an individual scale especially where a likelihood is low but risk is elevated in terms of the impact.

49. *In your view, should a scheme like Flood Re in New Zealand be used to address current and future access and affordability issues for flood insurance? Why or why not?*

Yes, but definition of risk here is critical. There is need to weight criteria for vulnerability and socio-economic situation more heavily than exposure.

Support a funding design through a compulsory levy on all residential-property home insurers.

50. *How do you think a scheme like Flood Re in New Zealand could support or hinder climate change adaptation initiatives in New Zealand?*

This has the same issue as existing insurance policy issue – premium discounts to properties that have ‘taken resilience measures and rebuilding more resiliently’ needs to be expanded to include relocation if the risk high enough.

The ‘sunset clause’ as in the Flood RE scheme should be brought forward as far as possible. If areas are too risky then it would be more appropriate to avoid risk in the first instance. This should always be priority. The transition between subsidised insurance and managed retreat needs to be explicit from the outset. The government needs to be bold in this regard.

Closing general question

51. *Do you have any other thoughts about the draft national adaptation plan that you would like to share?*

- The draft should establish clear commitment to local government for funding for implementing climate change adaptation actions.

- The draft needs greater focus and better clarity on Te Tiriti and He Whakaputanga government responsibilities on co-governance and actively supporting tangata whenua adaptation priorities.
- The draft should recognise that local communities and mana whenua are integral to the creation of local solutions and that funding assistance is needed for smaller communities to participate.
- The draft needs to set stronger outcomes and aims on intergenerational equity and address affordability issues through an intergenerational equity approach. It needs to identify what equity and affordability would look like from an intergenerational point of view.
- The draft lists current programmes and projects across the government. It needs to focus on roles, responsibilities, and transitions, rather than a compilation of activities.
 - For example, the plan needs to prioritise resourcing the development of a suite of activities to support local governments to plan and implement adaptation action within the first two years of the plan.
 - The plan should also address land-use planning barriers for local government to implement adaptation strategies.

Managed retreat

52. *Do you agree with the proposed principles and objectives for managed retreat? Please explain why or why not.*

- We support most of the proposed principles and objectives.
- A definition of 'intolerable risk' is required. Alternatively, standardise a process for how 'intolerable risk' is defined at a local scale or refer to other legislation or statutory guidance where it is outlined. We support provision of stronger tools for Councils to modify or extinguish existing uses of land in principle. However, there is confusion as to what is meant by the term 'stronger' - stronger in statutory mechanisms or legal backing?
- Switch out word <fair> for <equitable>.

53. *Are there other principles and objectives you think would be useful? Please explain why.*

- We would like to see a principle on putting communities at the heart of decision making on managed retreat that directly impact them. This is consistent with adaptive planning principles and practices.
- We would like a principle of partnerships first before mahi between local government, tangata whenua and central government.
- An objective to incorporate or align with existing adaptation plans / coastal strategies where the DAPP process is already underway.
- Principle to uphold mana whenua partnerships and Te Tiriti agreements, to enhance tino rangatiratanga.

- A funding and financing objective that determines roles and responsibilities relating to multiple agencies who have assets affected. For example, if a retreat or adaptation project will protect roads (Waka Kotahi), council infrastructure and electricity networks, who leads the initiative and how is the cost split across the agencies? A model and process for this would be a further action.
- Explicit financial support for local government to manage public infrastructure. This will be a massive element of managed retreat process that needs to be accounted for in objectives.
- Objective to support coordination and alignment across regional governance, stakeholders and organisations who will have a role and responsibility in managed retreat. Te Tai Tokerau example: councils, tangata whenua, Northland Transport Alliance, potential water entities, Department of Conservation, Lifeline Utility Groups.

54. *Do you agree with the process outlined and what would be required to make it most effective?*

Enabling investment is a key part of the 'feasibility' aspect of Stage B planning and preparing. We are seeing the complexity of who pays now in Clifton to Tangoio Strategy implementation. Funding parameters and investment options will dictate the plan for managed retreat. This stage needs to better capture *how* Stage C Enabling investment is decided and planned out.

The NAP needs to clearly identify where in the process wider regional organisation stakeholders are required to participate and align their planning. When do the new water entities need join the process? Can they initiate a managed retreat process and how would this work with any existing council and community adaptation plans?

55. *What do you think could trigger the process? What data and information would be needed?*

Triggers for a managed retreat process would need to be flexible and contextual to meet local community resilience outcomes and needs. It could be triggered if identified in a DAPP process as a response option that enables communities to meet their objectives and avoid tipping any risk thresholds. Local government, Waka Kotahi and Lifelines groups would play a critical role in relocating public infrastructure and activating the retreat process.

Any identification of managed retreat adaptation actions in future regional spatial strategies or NCA plans needs to come from extensive, community-centred engagement. Local government will need clear, statutory guidance on what 'managed retreat' identification for an area would mean for land-use planning and consents.

56. *What other processes do you think might be needed, and in what circumstances?*

- A handover process to transition any existing local government and community adaptation plans into the managed retreat framework.
- A process to access a contingency fund for the clean-up and repurposing phase of the process. This will be costly and unaffordable for many rural, smaller communities in Te Tai Tokerau.

- Development of a 'build back better' framework for managing change after events that may trigger a need to adapt retreat. The Westport and Tairāwhiti examples will be useful case studies in this approach.

57. *What roles and responsibilities do you think central government, local government, iwi/Māori, affected communities, individuals, businesses, and the wider public should have in*

a) *a managed retreat process?*

This question is missing a core group - regional/national public service and public asset stakeholders, including future additional entities. For example, potential three waters entities, Lifelines Groups, Department of Conservation and regional bodies.

Councils recognise that managed retreat roles and responsibilities may change significantly depending on the outcome of three waters reform.

Central government	Local government	Iwi/Māori	Affected communities	Individuals	Businesses	Wider public
Statutory guidance, including standards Legislate roles and responsibilities Funding	Facilitates decision-making process for wider community, public infrastructure (DAPP Process). Integrate decisions in current and future land-use planning. Ensures mana whenua can activate their managed retreat plans by incorporating and protecting those decisions in land-use planning.	[Note: This is mostly hapū in Northland, as opposed to Iwi.] Leads process for their whenua and whānau. Partners with local government to participate in wider DAPP process.	Centre of the DAPP process or similar adaptation planning process to identify managed retreat as the best response option. Continued support with monitoring and reviewing via a community panel.	Participates in wider consultation on changes to land-use planning. Increases awareness of natural hazards risks and changes to land-use designations via LIMs or other information campaigns.	Represented/participates in any DAPP process or similar adaptation planning process to identify managed retreat as the best response option. Private insurance sector has a role in funding, participating in insurance retreat management and transparency regarding retreat risk thresholds and parameters.	Participates in wider consultation on changes to land-use planning. Increases awareness of natural hazards risks and changes to land-use designations via LIMs or other information campaigns.

b) *sharing the costs of managed retreat?*

Central government	Local government	Iwi/Māori	Affected communities	Individuals	Businesses	Wider public
		-mostly hapū in Northland-				

Enacts 'no one left behind' principle. Funds majority of public sector infrastructure relocation and any significant hazardous commercial area retreat. Provides needs-based funding supporting to residents to support their relocation transition. Provides needs-based funding to hapū and iwi for their process.	Funds the decision-making process, engagement. Could contribute funding to the planning process through a region-wide rate. Avoid targeted rates because that will increase inequity in response options. I.e. who gets to stay/afford increasing cost to adapt en situ vs who needs to relocate.	Participates with human resourcing and governance oversight.	Depends socio-economic situation and the scale of retreat. May be responsible for purchasing replacement property or bearing the depreciation of their exposed property.	Depends socio-economic situation and the scale of retreat. May be responsible for purchasing replacement property or bearing the depreciation of their exposed property.	Depends on business affordability context. Large business sectors should be responsible for any costs to relocate. Small, local businesses will need support from national funding mechanism. Private insurance sector support with funding.	Potential to contribute to nation-wide levy that supports managed retreat.
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58. *What support may be needed to help iwi/Māori, affected communities, individuals, businesses, and the wider public participate in a managed retreat process?*

See answer to question 56.

59. *A typical managed retreat will have many costs, including those arising from preparation (including gathering data and information), the need to participate in the process, relocating costs and the costs of looking after the land post-retreat. In light of your feedback on roles and responsibilities (Q57), who do you think should be responsible for or contribute to these costs?*

See answer to question 56.

60. *What do you consider the key criteria for central government involvement in managed retreat?*

Central government's baseline involvement needs to include statutory guidance, tool provision and funding. The level of involvement and depth of support could increase incrementally based on community vulnerability and affordability context.

61. *There may be fewer options for homes and community buildings (e.g., schools, churches, community halls) to move than businesses (e.g., retail and office buildings, factories, utilities) for financial, social, emotional, and cultural reasons. That may suggest a different process for retreat, and distinct roles and responsibilities for these actors. Should commercial properties/areas and residential properties/areas be treated differently in the managed retreat process? Please explain why.*

This would be context-dependent and is difficult to answer from Councils' perspective. It would depend on the consenting situation and the nature of the commercial properties and areas. Any hazardous substances/hazardous land areas should trigger a different managed retreat process to match the increased scale of consequence. The cost of managed retreat for these areas will be greater. Communities must not shoulder these costs.

Commercial areas should be subject to the same process as residential areas to identify the land as a managed retreat area, either through a community DAPP process or via a regional spatial plan. Without an agreed process, there is a risk that commercial property and business owners' default adaptation response would be mitigation and protection. This response may not be appropriate or affordable if the main funding source is a targeted rate.

62. *Even in areas where communities are safe, local services and infrastructure, such as roads, power lines and pipes may become damaged more frequently and be more expensive to maintain because of erosion or increases in storms and rainfall, for example. Local councils may decide to stop maintaining these services. Are there circumstances in which people should not be able to stay in an area after community services are withdrawn?*

There are no clear circumstances now. Following a DAPP process, the decision to change or stop maintaining services would be a community-led decision, not solely on part of the councils. Any additional council concerns would be around liability.

63. *In what situations do you think it would be fair for you to be required to move from where you live?*

Not applicable – this is not a question that councils can respond to in a joint submission.

64. *Many residential communities are made up of a combination of renters, owner/occupiers and people who own a property and use it as a second/holiday house. Do you think there are reasons for these groups to have various levels of involvement in a managed retreat process?*

This question is difficult to answer without knowing how land use designations and property rights may change under Climate Adaptation Act. There will also be a different approach required for whenua Māori and ancestral lands. In terms of engagement, all groups will need to be consulted and have ability to inform community outcomes and risk thresholds.

65. *It is not always obvious that an area is at elevated risk from natural hazards or the impacts of climate change. However, council risk assessments and increased data and information should make these risks clearer. Do you think different approaches should be taken for those who purchased properties before a risk was identified (or the extent or severity of the risk was known) and those who bought after the risk became clear?*

Councils are commenting on this from a land-use planning, consents, and risk management perspective. From a risk management perspective, if the risk is identified and assessed as intolerable enough to activate a managed retreat process, there should be no major difference. The outcome will need to be relocation.

However, there is a risk that those on low incomes or the most vulnerable will purchase or rent properties where the valuation has been reduced because that is all they can afford. What is the threshold for this? Flood hazards have been identified on properties for a long time and yet many do not understand the risks. These considerations would change the process, in other words, increased government support to enable relocation.

If there is any difference, Councils will need extensive guidance that will need to be integrated into future resource consents and LIMs processes. Councils will also need to engage with communities to understand these key differences.

66. *Under what circumstances do you think it would be fair or necessary for government to take different approaches with a greater or lesser degree of intervention or support?*

In principle, yes different approaches may be necessary. Determining those circumstances would require significantly more consultation with local government, with iwi and hapū, and with public health providers. It would require the development a series of criteria and weighting focused on vulnerability, equity, exposure to hazard/s and socioeconomic context.

67. *How do you think land with historical, cultural, social, or religious significance (e.g., cemeteries, or churches) should be treated?*

These areas should be treated at a local scale, where community and guardians of that land are the main decision-makers of how to design and implement any relocation activities. This could be supported through a government fund, at regional or central government level.

68. *Some Māori communities, both inland and coastal, have needed to relocate as a result of events (including natural disasters) that have impacted their marae and wāhi tapu. These examples show that Māori communities are aware of the ways that climate change is affecting their marae, papa kāinga and wāhi tapu, and how relocation can be approached as a community, with engagement from iwi, hapū, and whānau. The examples also demonstrate that climate change is impacting coastal communities as well as inland communities located closer to rivers and lakes. How do you think managed retreat would affect Māori?*

Managed retreat will have a huge effect on Māori. In Te Tai Tokerau it will vary by whānau, haukāinga, hāpori, and hapū. It will impact not only the people who need to relocate but also those whose rohe people need to retreat into. There will be major additional impacts on whanaunga and tangata whenua in the area who have connections, ties and relationships to any communities that need to relocate.

Little whenua Māori remains in the ownership of Māori. Much of the whenua Māori that remains in the ownership of the whānau is subject to a prominent level of planning burden. In some cases that it due to areas more suitable for development being no longer in Māori ownership or because the whenua has a high amenity value, because it is undeveloped compared to adjoining land parcels. These blocks then carry the amenity value for the district, region, and nation, limiting the ability of hapū to meet their own aspirations.

Existing planning mechanisms would need to change as hapū representatives in Te Tai Tokerau have raised issue that the ability of hapū to retreat to whenua of higher ground

is limited and restricted by existing planning mechanisms such as SNAs (Significant Natural Areas), ONLs (Outstanding Natural Landscapes).

Land loss and the loss of connection to their wellbeing base since colonisation has been severe with impacts on the wellbeing of Māori continuing to the present day. Climate change could compound historic land and cultural infrastructure losses as well as existing inequities already faced by Māori.

The movement toward Māori being able to repatriate their own whenua has been long, drawn out and fraught with challenges. For many, going back to their ancestral whenua is the only opportunity to allow them to have a home, own a home, build a home. That aspiration and their ability to build their wellbeing from their home may no longer be viable.

In some cases, whānau might be moving to the rohe of neighbouring hapū of which there is likely to be whakapapa ties. However, their rights and responsibilities in these other areas could be inherently different to those of the haukāinga. Therefore, their ability to access housing support provided for papakāinga under current frameworks could be unsuccessful because it is tied to a whakapapa to the whenua. We reiterate the point that our existing tools will need to change.

69. *Managed retreat has rarely occurred in Aotearoa, especially within Māori communities. However, there are examples of Māori proactively working to protect their marae, papa kāinga and wāhi tapu by either relocating or protecting and developing their current sites. In these instances, the focus was on protecting and preserving their taonga for future generations. What do you see as being most important in developing a managed retreat system for iwi/hapū/Māori?*

Objectives:

- Decision making within a managed retreat system delivers on the partnership intended in Te Tiriti o Waitangi.
- Owners of whenua Māori are treated equitably. Inequitable historic treatment of owners of whenua Māori through mechanisms such as rating, and land acquisition do not continue.
- Involvement of Te Kooti o te Whenua Māori in the administration of whenua Māori.
- Property valuations and any compensation mechanisms do not value whenua Māori inequitably because of the absence of structures on the land. Recognise that whenua Māori has existing limitations on the ability of the owners to access finance to build, often due to the land being in multiple ownership.
- Opportunity to learn from indicators and triggers already identified and being monitored at a local scale.
- Iwi and hapū management plans within Te Tai Tokerau (Patuharakeke Hapū Environmental Plan) outline the following, which can guide a managed retreat system/approach:
 - Hapū and whānau communities have sufficient information to allow them to identify potential impacts on their marae, papakāinga and sites of significance. These communities can plan for the effects of climate change in a proactive

manner, enabling them to develop responses that adapt to or accommodate change.

- Planning mechanisms are agile to enable a seasonal approach to the use and development of resources, enabling hapū and whānau communities to make the most of any opportunities that a changing climate might bring.
- Energy needs of Te Tai Tokerau are met from community-owned renewable energy resources, generated within the region and enabling a more resilient network.

70. *Māori land and Treaty settlement land have unique legislative arrangements. Restrictions and protections are placed on Māori land to meet a clear set of principles and objectives that recognise the cultural connection Māori have with the land and a specific focus on land retention and utilisation. Treaty settlement land that has been acquired through Treaty settlement processes is most likely to have cultural significance to a particular iwi or hapū and used to support the aspirations of their people. How do you think Māori land (including Treaty settlement land) should be treated?*

With great care and as Māori decide. Māori need to be full decision makers of their land. This question can only be answered by mana whenua, who need to be supported by strong directive language in the Climate Adaptation Act.

Local government will also need guidance on how to follow this direction. What land use planning requirements are needed to adhere and actively support mana whenua led decisions about relocation? What if these decisions are in contradiction with other spatial plan outcomes or land-use designations? Places of retreat or relocation for Māori need to be designated or decided early on in upcoming regional spatial plans.

Owners of whenua Māori must be treated equitably. Inequitable historic treatment of owners of Whenua Māori through mechanisms such as rating and land acquisition must not continue.

Involvement of Te Kooti Whenua Māori in the administration of whenua Māori.

Property valuations and any compensation mechanisms do not value whenua Māori inequitably because of the absence of structures on the land. Recognise that whenua Māori has existing limitations on the ability of the owners to access finance to build, often due to the land being in multiple ownership.

71. *How do you think post event insurance payments could help support managed retreat?*

Incentivise relocation by requiring insurance payments go towards rebuilds or property purchase in low-risk areas.

72. *Should insurability be a factor in considering whether the Government should initiate managed retreat from an area?*

Yes, but only alongside vulnerability and socioeconomic considerations, and only with great transparency requirements for how insurance companies decide risk thresholds for premiums and insurance retreat.

Appendix A

Kaipara District Specific Considerations

- In Kaipara District more than 250 square kilometres is exposed to coastal flooding under a 1.5 metre sea level rise future. Most of this area is on the Northern Wairoa River, and includes North Kaipara Agricultural Delta, an area of highly productive alluvial soils which supplies 95% of New Zealand's kumara as well as other crops and pasture.
- Coastal flooding and fluvial (river) flooding have been identified as the priority, highest risk hazards to Kaipara District infrastructure. Kaipara's stop banks and other flood management infrastructure continues to be managed and maintained by Kaipara District Council. There are 29 drainage systems across the District.
- Residents cannot afford the investigation, design, and adaptation actions necessary to address coastal flooding and fluvial flooding risks.
- Dargaville, the only town and main service centre on the West Coast of the District, is significantly exposed to mid-century and late century river and coastal flooding. A first pass risk assessment has identified high risks to community and public infrastructure. Significant physical work to the stop bank system along Dargaville and Awakino Point is needed. This physical work is not affordable to Dargaville area residents, nor to all Kaipara District residents.
- Kaipara District has 13 of Northland's 28 closed landfill assets, which are exposed to fluvial flooding, coastal inundation and coastal erosion. This is identified as a high risk for Kaipara District. Council does not currently have a solution regarding affordability for residents to support the physical works necessary to address these risks.
- Flood management for Ruawai's community, public infrastructure, agricultural hub and highly productive soils involves a complex system of 3.5-metre-high stop banks, flood gates and drains. This system is managed in partnership with Ruawai landowners through the Raupō Drainage Committee, formerly a Drainage Board under the Land Drainage Act 1908.
- Typically, flood protection infrastructure is managed and maintained by a regional council, however there is no catchment management plan, nor Northland Regional Council resourcing, for the Northern Wairoa River system and over 100 kilometres of stop banks along the river.
- Costs associated with maintaining and operating the stop banks and flood protection infrastructure are largely met by a targeted rate imposed on residents within the drainage districts, and these rates are increasing. Estimated costs from 2019 found that roughly \$78 million was needed to improve the Northern Wairoa stop bank system.
- The transport network faces significant exposure to coastal and fluvial flooding, both in Kaipara and across all of Te Tai Tokerau Northland. *New Zealand Fluvial and Pluvial Flood Exposure* (NIWA, 2019) report identified over 1,141 kms of road network in Northland exposed to flooding. Northland Transport Alliance (NTA) is responsible for the transport network across the region. To date, there has been no engagement from Waka Kotahi,

despite both SH12 and SH14 with mapped significant exposure to flooding and despite the reliance on these state highways for the rest of the NTA road network.

- Mangawhai, on Kaipara District's East Coast, is one of the fastest growing areas in the country, where median house prices have more than doubled in past ten years.
- Mangawhai is exposed to both coastal erosion and coastal flooding. Council is working through the difficulties of managing risk to coastal hazards for developed areas along the coastline, while also managing increasing numbers of resource and building consent applications.