

2022 Draft National Adaptation Plan and Adapt and thrive: Building a climate-resilient New Zealand

Submission to the Ministry for the Environment

June 2022



What is Taituarā?

Taituarā – Local Government Professionals Aotearoa thanks the Ministry for the Environment for the opportunity to submit on the on the draft National Adaptation Plan (NAP)

and associated managed retreat consultation *Adapt and thrive: Building a climate-resilient New Zealand*.

Taituarā is an incorporated society of nearly 1000 members drawn from local government Chief Executives, senior managers, and council staff with significant policy or operational responsibilities. We are an apolitical organisation. Our contribution lies in our wealth of knowledge of the local government sector and of the technical, practical, and managerial implications of legislation.

Our vision is:

Professional local government management, leading staff and enabling communities to shape their future.

Our primary role is to help local authorities perform their roles and responsibilities as effectively and efficiently as possible. We have an interest in all aspects of the management of local authorities from the provision of advice to elected members, to the planning and delivery of services, to the less glamorous but equally important supporting activities such as election management and the collection of rates.

Local government has a keen interest in the draft NAP and the proposed framework for managed retreat. As acknowledged in the consultation document, local government is the key delivery partner for adaptation planning. The policies, plans and initiatives that are included in the NAP will have a significant impact on the work programmes of local government. As such, we feel it is imperative to submit on this consultation to encourage changes which will lead to the successful implementation of the NAP. We encourage you to work with Taituarā, LGNZ and the local government sector to ensure a joined-up response to climate risks across all of government.

Executive Summary

- We welcome the NAP; however, it lacks a clear adaptative pathway for how Aotearoa will build resilience to the impacts of climate change, many of which are being experienced already in communities.
- A much more ambitious plan is needed that focuses on outcomes and provides clear direction and support for local government and communities.
- The plan and proposals for managed retreat need to better address:
 - Funding and in particular alternative funding avenues that will not place an additional burden on the ratepayer and how the costs of adaption should be shared
 - Government investment in resilience to reduce risk and save money in the long term,
 - Priority locations for action and,
 - Integration with the wider reforms impacting on local government and communities, including reform of the Resource Management system
- We support integrating mātauranga Māori into adaptive planning needs and think this needs to be prioritised.
- We support requiring an integrated, collaborative, joined up, intergenerational process for communities to drive and inform adaptation action in place. For this to occur, central government needs to work with local government more closely.
- A genuine partnership with local government, Māori, communities and business is required if the step change we need is to occur and plans. Key areas for partnership working include:
 - Co-designing the adaptation policy framework (focusing on protecting, accommodating and retreating),
 - Clarifying roles and responsibilities,
 - Moving from risk analysis to adaptive planning,
 - Addressing the top-priority climate risks and priority places for action (including managed retreat),
 - Funding arrangements for action and,
 - The production of guidance.

A more ambitious plan

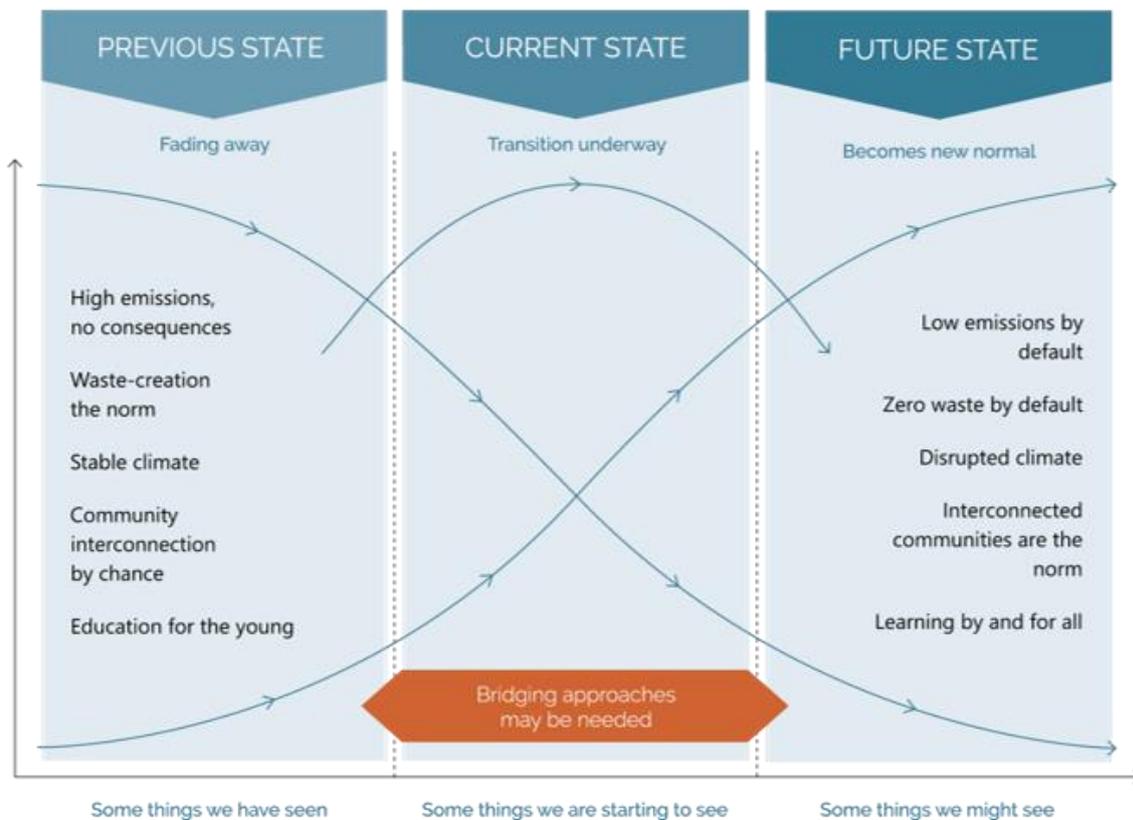
1. The draft National Adaptation Plan ('the draft Plan') has been highly anticipated. For many years local government, communities, businesses, and academics have called for a comprehensive adaptation plan to ensure New Zealand is resilient to the climate risks we face. However, the draft Plan does not meet the level of ambition or sense of urgency required to ensure a just transition to a climate resilient Aotearoa New Zealand. Following the release of the draft Plan, concerning new predictions from NZ Sea Rise¹ further highlighted the pressing need for adaptation planning and provided a stark wakeup call that business as usual will not be sufficient to ensure that "our people, places, and systems are resilient and able to adapt to the effects of unavoidable climate change in a fair low-cost and ordered manner".² A significant portion of the policies contained in the draft Plan are actions that should have been advanced long before now.
2. Furthermore, despite acknowledging the interconnected nature of climate issues within the draft Plan there are no clear links between adaptation and other key issues such as resilience and mitigation. This has resulted in a lack of consideration or appreciation of the co-benefits that arise from policies and proposals which may be included in a quality adaptive pathway. Identifying and providing clear links between the draft Plan and the Emissions Reduction Plan will be necessary to ensure sustainable development and an efficient and integrated climate risk response.
3. The draft Plan as proposed presents a missed opportunity to provide New Zealand with a transformational system change to build resilience to climate risks. For the most part, the draft Plan provides a list of policies and programmes that touch on the topic of adaptation but are part of existing government work programmes. Few of the proposals go beyond what work has already been undertaken. The scope of the draft Plan should have gone further.
4. Clearly establishing a dynamic pathway to climate resilience which includes a comprehensive framework for funding and guiding short, medium and long-term actions is critical to the success of the NAP. This creates more uncertainty in terms of how and when adaptive measures will be implemented. A plan that provides not only for actions but also the funding required to implement them would give the certainty required to proceed with significant adaptation planning and initiatives. Below we expand on a number of recommended changes that would improve the draft Plan including the incorporation of mātauranga Māori and a systems-based approach to the draft Plan.

¹ <https://www.searise.nz/>

² Vision according to Page 13 Draft National Adaptation Plan

3 Horizons and Dynamic Adaptive Planning

5. One notable aspect of the draft Plan is the lack of dynamic adaptive planning. The Dynamic Adaptive Policy Pathways (DAPP) approach is considered best practice for developing climate risk action plans. Indeed, DAPP thinking is embedded in previous adaptation advice provided by the Government such as the Coastal Hazards and Climate Change Guidance to Councils published by the Ministry for the Environment (MfE).
6. We support the inclusion of “adjust as we go” as a principle for implementation. Unfortunately, it is unclear in the plan when decisions and design actions are to be revisited and what trigger events will result in different adaptive pathways being selected. The ability for government to make informed adjustments is impeded by a lack of a coherent framework for monitoring and evaluation within the Plan. Clear mechanisms to establish the risk to communities and indicators to determine whether desired outcomes are being achieved. We expand on this further in the evaluation and monitoring section below.
7. The use of DAPP approach throughout the draft Plan would ameliorate these concerns and allow for more responsive and resilient planning under uncertain conditions. Identifying adaptive pathways and trigger points to undertake particular work programmes will afford a more resilient plan that is adaptable in the face of the currently uncertain decision-making context.
8. Despite describing long-term thinking and intergenerational perspectives as principles for including actions in the draft Plan there is little acknowledgement of policies which would indicate thinking beyond the medium term. The draft Plan seems to focus predominately on top ten risks identified in the National Risk Assessment over the next six years. This is an unfortunate missed opportunity that inhibits future dynamic action (that is to say the lack of long-term signals inhibits actors’ ability to begin transition at an early point). While establishing systems and reforming institutions lays the groundwork for planning into the future, the key shifts needed over the short, medium and long term are not stated within the draft Plan.
9. Taituarā encourages MfE to incorporate a three horizons approach to adaptation planning. 3 Horizons thinking is focused on actions we can take in the present in relation to all three-time horizons simultaneously.



- When we think about Horizon 1, we are thinking about acting today to maximise impact in current conditions.
 - When we think about Horizon 2, we are thinking about acting today to position well for changing conditions, for what's coming.
 - When we think about Horizon 3, we are thinking about acting today to shape the future environment as it is evolving.
10. Explicitly using a 3 Horizons framework provides:
- clarity about the state we need to move towards (Horizon 3) i.e, an end state that is both clear, expressed in terms that are clearly measurable/objectively identifiable, and ambitious
 - helps to manage the risk (intensified by the need to move faster) of getting locked into interim solutions (Horizon 2 solutions) that are better than current practice, but then prevent us getting to Horizon 3 (called H2- solutions)
 - puts a focus on solutions that will act as stepping stones to H3 (H2+). At the very least it helps us to see that where potential H2- actions are the best short term fix and that we see them specifically as transitional and have exit strategies as an up-front part of the planning.
11. Currently, there is a clear focus on actions that provide short (and in some cases) medium term outcomes. Developing a clear pathway to the long-term policies and projects would require further work being undertaken under the 'Future Work Programme Proposals' sections of the plans. A critical pathway from immediate actions to long term changes should be outlined as well as the transitions and steppingstones that will be required along the way would facilitate

a more comprehensive and clearer pathway to a climate resilient future that has not left the most vulnerable people and communities behind.

12. One further aspect of the Plan that provided cause for concern was the continued siloed thinking evident throughout the consultation document. Although it is acknowledged that climate change impacts on all aspects of our lives, the document does not explicitly recognise the interrelationships between each aspect of the system. For example, the resilience of homes and buildings along the coast is closely tied with the supporting infrastructure provided in the surrounding area.
13. Climate change requires a systems level response. It will not only require all aspects of our economy to decarbonise and build resilience to climate risks but for these changes to occur as part of a joined-up response. Proposing a comprehensive systems approach that recognises the interdependencies amongst the identified actions also has the ancillary benefit of allowing government to seize upon the opportunity to deliver actions which provide co-benefits.
14. We recommend that the final NAP and future iterations of it takes a more holistic, integrated view, resolves the inherent tensions between the outcome areas and maximises the benefits of action to achieve outcomes across the system. Ultimately, the main tensions when working on adaptation and managed retreat come from determining who pays and reconciling collective and individual interests and world views.
15. The work of making transitions needs funding and resourcing – both creating the new systems and structures needed AND the actual processes of change. In particular, we have concerns that under-resourcing the process of change will result in poor implementation (as we saw with the introduction of the Resource Management Act 1990). Resourcing needs to be an integral part of any thinking about a 'just transition'.

Recommendation:

That the final NAP adopts the Three Horizons Framework and Dynamic Adaptive Policy Pathways approach

Te Ao Māori and mātauranga Māori

16. Taituarā recognises that Māori have vast and varied interests in the NAP and the work programme proposed in the Plan. Climate change impacts on whānau/hapū/iwi, haapori Māori, Māori business, Māori as landowners, Post Settlement Entities, Trusts, Incorporations and pan-Māori collectives and interest groups. Throughout the document we refer to Māori acknowledging that for specific objectives and actions the relevant rights and interest holders and groups

involved may be different for different levels of the system (e.g. national or local policy design and decision making) and for different actions (for example spatial and community planning, managing retreat, incorporating local mātauranga).

17. Whilst noting the Rauora framework, the draft Plan primarily draws upon western adaptation planning practices. Given the clear obligations of the Crown in relation to Te Tiriti o Waitangi a lack of active consideration or inclusion of changed practice and mātauranga Māori within the plan is disappointing.
18. While there are a number of actions within the Plan, for example to develop guidance for incorporating mātauranga Māori and fill knowledge and research gaps, it will be important to ensure these gaps are filled as soon as possible to future plans, guidance and action, aligns with Te Ao Māori, works across interconnected systems, increases resilience and address the root causes of climate change, and clarifies how government (both central and local) can fulfil their obligations under Te Tiriti o Waitangi.

Recommendation:

Incorporate Te Ao Māori and mātauranga Māori into the final NAP and clearly establish the Te Tiriti obligations of government with respect to adaptation planning.

Overarching comments

Principles and objectives

19. The principles for including actions in the plan are laudable. Proactivity, intergenerational thinking, maximising co-benefits, and prioritising those most vulnerable to climate impacts are key to ensuring a just transition to a climate resilient Aotearoa. Equity and the co-benefits of projects should be core to the consideration of selecting adaptation policies.
20. The principles for implementing actions are commendable. Collaboration, flexibility, normalisation of adaptation, making well informed decisions, enhancing nature, and localism are notably good principles for the implementation of adaptive pathways. Taituarā is particularly supportive of the principle to adapt locally. The principle of subsidiarity acknowledges that those who are more intimately affected by issues are best placed to make well informed decisions regarding potential solutions. Communities can articulate their needs and align projects and policies with community values and aspirations, therefore creating a more engaged and thriving community in the future.

Sharing the cost of adaptation investment

21. The NAP was intended to provide certainty in the progression of adapting to the impacts of climate change. In addition to providing consistent policy guidance and national direction to adaptation planning, the NAP needs to provide clear funding and investment indicators. However, this is an area of the Plan which seems to be lacking. While some actions provided for in the Plan are backed with resourcing this seems to only include those actions already being progressed under existing budgets. This is disappointing given that local government, communities, banks and insurers have spent years calling for further Government investment in building climate resilience. We note that in accordance with s5ZS(4)(f) of the Climate Change Response (Zero Carbon) Act, the NAP should be explicit about funding of the proposed actions, however it is currently silent on how local government is expected to fund these. Clarity on this is critical as the only funding mechanism currently available to local government is to raise rates, which is not palatable to communities and is subject to public consultation processes.
22. Early and transformational investment is required if the Plan is set to help develop resilience and help New Zealanders to adapt to the many climate risks we face. Unfortunately, funding allocations for adaptation planning and implementation are not commensurate to the scale of change required. Early investment is key as the costs associated with adapting increase exponentially the impacts of climate change are increasingly felt. The corollary of this is that early investment in climate resilient buildings, assets and infrastructure located in areas of low risk will reduce the cost of recovery after natural hazard emergencies. Furthermore, sunk costs will not be added to if infrastructure and development investment is built in a climate resilient way.
23. Whilst it is understandable that the Crown wants to reduce their liability and they cannot bear the entire cost of adapting New Zealand to climate risk it is necessary for costs to be distributed in an equitable manner. Local government and the communities they serve do not have the capacity to bear the significant cost of adapting to climate change. The rating system currently available to councils is insufficient to meet the costs of adaptation. Central government co-funding will be required in order to mitigate natural hazard risks. As with the Awatarai Managed Retreat Plan in Matata, financial support will be required from central government to deliver on many adaptation initiatives. Some work has already been done in this area. For example, local government has already produced the Central Government Co-investment in Flood Protection Schemes Report³.
24. Where councils and communities are capable of financing adaptation interventions these will be more affluent than the average New Zealander. Lower

³ Retrieved from: 002-Central-Government-Co-Investment-in-Flood-Protection-January-2022_ADVANCED-COPY-EMBARGOED-3PM-6-APR-22.pdf (lgnz.co.nz)

socio-economic communities, who are already highlighted as feeling the effects of climate change to a greater degree will not be able to properly finance the cost of adapting to increasing risks. Not only would this outcome further the growing socio-economic divide in New Zealand but it is also misaligned with the principle of a just transition as outlined in the Plan.

25. Beyond reducing fiscal risk there is a requirement for significant investment in communities across Aotearoa New Zealand. Signalling that central government will not bear the full cost of adaptation does not provide a clear financing pathway forward. Irrespective of the particular percentages the distribution of costs across key stakeholders is a matter that will need to be settled quickly. More clarity around government investment and co-funding for adaptation initiatives is required. We recommend the government enters into partnerships with local government, insurers, banks and other key stakeholders to develop a framework for how the costs of adaptation will be shared. In our view, there is an urgent need for the government to work with local government (and other sectors) to develop a principled framework for funding climate-driven natural hazard adaptation projects, together with supporting guidance and communication aids, and to unlock that funding for groups to access early in the term of this first NAP. Experiential learnings from Matatā, Kaikoura, and Christchurch, all demonstrate there are circumstances when Government financial support is essential in order to successfully deliver natural hazard risk reduction initiatives. This framework will need to establish how costs can be shared in an equitable manner in order to ensure a just transition across the varied communities affected by climate change.

Recommendations

That central government works with local government to establish funding for the delivery of the proposed actions.

That central government, in conversation with local government and other key stakeholders, develop a framework for how adaptation costs will be shared.

The Role of Local Government

26. Local government has been at the forefront of adaptation planning in New Zealand for many years. A number of regions and communities have progressed adaptation pathways and managed retreat plans, they have significant experience and insights that would be beneficial to consider when developing guidance and policy frameworks. Many councils, with neighbouring councils and collectively as regions, have developed adaptation frameworks and plans with their communities including:

- Te Ara Whakamua o Te Awa Kairangi ki Tai, Lower Hutt Climate Action Pathway March 2022 (led by Hutt City Council)

- Climate Adaptation Te Tai Tokerau (led by Northland Regional Council, Whangarei District Council, Kaipara District Council and Far North District Council)
 - Hawkes Bay Clifton to Tāngōio coastal hazard strategy (led by Hawkes Bay District Council),
 - Takutai Kāpiti: (community-led coastal adaptation)
 - Christchurch City Council's Coastal Adaptation Framework
 - Otago Regional Climate Risk Assessment.
 - Wharekawa Coast 2120 Community Plan (led by the Hauraki District Council),
 - Shoreline Management Plans (led by the Thames-Coromandel District Council)
 - Port Waikato Community Resilience Strategy (led by the Waikato District Council).
 - South Dunedin Future and the St Claire and St Kilda Coastal Plan (led by Dunedin City Council)
 - Awatarariki Managed Retreat Programme (led by Whakatane District Council)
27. We strongly encourage MfE to work with those who have significant experience in adaptation planning to test the viability and deliverability of the policies and initiatives proposed in the NAP.
28. Throughout the Plan the critical role of local government in delivering adaptation planning is acknowledged. As a key delivery partner local government needs to be included in the development of the next iteration of the Plan. This will be beneficial as local government officials have a vast amount of knowledge and 'on the ground' experience in adaptation planning. This would not only bring a practical perspective to the Plan but also allow MfE to gather insights around what specific support and guidance is relevant and useful for the implementation of the plan. Implementation is key to the success of the Plan and inclusion of delivery partners in the co-design of the Plan will enable ownership from the stakeholders.
29. There would be value in conducting joined up conversations with local government, Māori and sector leaders as this would present an opportunity to link actions which deliver co-benefits, reduce communication barriers, and empower each stakeholder in the Plan.
30. We note the NAP recognises the need for a new professional development programme for key practitioners (p.127) but that this is not planned to begin until 2025/2026. This is unacceptable and neglects the very real need for immediate support for the local government sector in delivering robust adaptation plans today.

Recommendations

That MfE works with local authorities with experience in adaptation planning to being a practical perspective to the development of policy frameworks and guidance.

That the government conduct joined up conversations with local government, Māori and sector leaders to better link actions and deliver co-benefits through the implementation of NAP.

That the professional development programme delivery is brought forward.

System Wide Actions

Focus area one: Reform institutions to be fit for a changing climate

31. Under Focus Area One the Plan acknowledges the wide ranging and large-scale reforms that are already under way. The reforms to 3 Waters, the RMA and Future for Local Government present an opportunity for systemic change. However, there is a current concern that these reforms are not aligned and this will result in a system that does not deliver the desired outcomes. Taituarā therefore encourages the MfE Climate Team to work with their colleagues within MfE and other government agencies but also more widely (including with local government, Māori, and the communities affected) to ensure that climate adaptation is actively considered when designing these systemic reforms to ensure the legislation and institutions are fit for purpose. These conversations should be undertaken in a joined-up manner with all the key stakeholders and those with rights and responsibilities at the table.
32. The draft plan appears to have an output of establishing central government oversight and coordination. We previously welcomed the establishment of a panel of central government CEs that are jointly and severally accountable for delivery of a cross departmental work programme. This avoids policy silos and ensures CEs are not focussed only on 'the things on their performance agreement'.
33. But local government has and will play a key role in climate change adaptation – as a funder, a planner, a commissioner of services, project deliverer and so on. This not only makes the sector more than another stakeholder to be managed, it makes the sector a partner in the achievement of the plan. Partners for implementation should be co-designing the plan with government. To do otherwise risks adding a 'pan-sectoral silo' to the 'cross government silo'.
34. It would be useful to include Māori and local government representatives when establishing central government oversight and coordination for implementation. Having these delivery partners at the table will enable better transparency and accountability throughout the Plan.

35. Local government needs to be brought into these conversations early and not just as an observer or as a consultee. The local government sector needs to be engaged from the outset in identifying the issues, options, community needs and aspirations, and future work programme. That may mean some lateral thinking about institutional relationships, collaboration, and a one system approach to deliver better outcomes for communities and the environment.
36. Potential changes to the Public Sector Act, and/or the way it is currently implemented, might be required to integrate with the other reforms and reviews underway (water, waste, resource management and future for local government). Ultimately, we need to shift the behaviour and invest in the relationships for successful implementation. People, after all, are at the heart of successful delivery.

Focus area two: Provide data, information, tools and guidance to enable everyone to assess and reduce their own climate risks

37. Under Focus Area Two, there are several actions that should be co-designed with the end users. For example, the development of guidance for local government is warmly welcomed however for the guidance to be effective it needs to be fit for purpose and easily implementable within the institutions and constraints the practitioners work within. Delivery of the rolling programme of targeted guidance would provide a base framework of national direction to support local adaptation activities.
38. Taituarā supports the range of guidance outlined in *Table 3*. However, we have concerns regarding the timing for '*Providing guidance on integrating mātauranga Māori into adaptive planning and working with mana whenua*'. To properly embed Te Ao Māori in the direction and guidance provided this piece of work should be prioritised and brought forward in the timeline. This could enable the Crown to fulfil its obligations under Te Tiriti o Waitangi and avoid assuming a western systems approach in the guidance given and incorporating mātauranga Māori later. Engagement with Māori, specifically iwi and hapū, should be early and comprehensive. Developing the relationships between partners will be key to the delivery of the Plan in a way in which is consistent with the principles of Te Tiriti.
39. We also recommend that guidance is produced:
 - to address the socio-economic disparities that arise as part of adaptation, i.e. those who can pay to defend versus those who could only afford to retreat, to ensure inequities are not exacerbated
 - to cover all known natural hazards – e.g. erosion, landslides, drought, earthquake and liquefaction among others – and provide a framework to carry out multi-hazard risk assessment

Recommendations

That the Interdepartmental Chief Executives Climate Change Board become a cross-sectoral board.

That local government co-designs the guidance outlined in the Plan to ensure the guidance is workable and fit for purpose.

That MfE works with their colleagues, Māori and local government to strategically align the NAP with other key reforms including Resource Management, Three Waters, and the Future for Local Government.

Bring forward the development of mātauranga Māori guidance to ensure te ao Māori is incorporated into the development of adaptation plans.

Natural Environment

40. Taituarā supports the critical actions and supporting actions contained in the Natural Environment section the draft Plan, despite the unclear criteria used to determine which actions are critical or supporting. Biodiversity is a key aspect of our natural environment ecosystem, restoring and building resilience in our ecosystems will be critical actions in the work to develop the adaptive capacity of Aotearoa. However, the future work programme proposals of 'developing mātauranga Māori indicators' and 'establishing an integrated work programme' should be prioritised. This would provide a framework under which actions will be able to realise the co-benefits of activities and meet Te Tiriti obligations. The latter of these outcomes will bolster the low resilience of Māori that is identified in the plan.

41. Taituarā notes the importance of implementing the National Policy Statements on Freshwater Management and Indigenous Biodiversity. Both National Policy Statements have clear benefits to improving the resilience of our natural environment. The draft Plan needs to highlight the role of local government in implementing these National Policy Statements and outline the support central government will provide to ensure a consistent application across Aotearoa. This support and guidance could extend to providing local government officers a clear timeline regarding the release of the NPS IB, therefore allowing councils to establish the capacity to gather data and information, work with landowners to implement changes and plan for indigenous ecosystems.

42. A significant number of the actions included in this section require the implementation of Policies and projects across the Motu. These will require delivery through local government. It is key to the success of the implementation that local government are supported in the delivery of these

actions. Ensuring fit for purpose guidance, funding and reviewing the implementation of these projects will be key when expanding the scope of projects to those not currently included in the draft Plan. A clear feedback loop which enables learnings to be shared amongst central government departments and local government will be necessary to ensure the ongoing improvement in adaptation planning and biodiversity enhancement across Aotearoa.

Recommendations

Bring forward the actions of 'developing mātauranga Māori indicators' and 'establishing an integrated work programme.'

Establish a feedback loop to understand the key learnings from the current projects which can then be disseminated to providers of future projects.

Establish a co-funding framework to support delivery of these actions at the central and local government level.

Homes, Buildings and Places

43. Taituarā supports the actions identified under the Homes, Buildings and Places section. In particular, we commend the focus on ensuring iwi and Māori are prepared for climate adaptation. Prioritising these work programmes is critical to facilitating a just transition to a climate resilient future. There are significant gains in adaptive capacity that can be realised under work programmes contained within the plan. This is key to the resilience of Aotearoa moving forward as the built environment provides the bedrock of many communities. Without adequate provisions to protect (or relocate) homes, public buildings, and taonga, there is a risk to the ability of New Zealanders to be reliant and thrive under the impacts of climate change.
44. Local government have a key role in the regulation and planning of buildings and homes. The implementation of the Government Policy Statement for Housing and Urban Development, changes to Land Information Memoranda, and aspects of the Building for Climate Change work programme by local government will be critical to achieving the adaptive objectives outlined in the Plan.
45. Local government will be a key conduit for information given to building owners and developers. Of particular significance is the role of territorial authorities in providing LIMs to prospective buyers. We welcome the

proposed changes to LIMs led by DIA. These changes will improve the information buyers have and allow climate risk to be an appropriately weighted consideration in the decision of whether to purchase the property or not. In addition to this, we support reducing the liability of councils for providing information through LIMs as this will curtail the fears many local authorities have about including climate data on LIMs.

46. 'Building property resilience' and the associated assessment frameworks are also well within the purview of local government. Councils hold planning functions which determine the location of buildings and development. Furthermore, communicating property level guidance and supporting property owners and developers to understand the climate risks associated with their buildings and what adaptive measures are required will be required during the consenting process. We encourage MBIE to work with local government to ensure the guidance and regulatory changes are fit for purpose and implementable.

Recommendations

That local government co-designs the guidance outlined in the Plan to ensure the guidance is workable and fit for purpose.

Infrastructure

47. Taituarā supports the critical and supporting actions identified under the Infrastructure section. Local government governs and manages a significant portion of the infrastructure in Aotearoa New Zealand, \$5billion of which is vulnerable to sea level rise.⁴ The government needs to work with local authorities 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. Developing assessment methodologies and a resilience code for infrastructure will provide local government and other infrastructure asset owners the tools required to properly understand and manage the risks associated with climate change. These tools are long overdue. Local government needs to make clear signals to their communities surrounding what changes need to be made in relation to the infrastructure services they provide and where they will provide them.

⁴ Vulnerable: the quantum of local government infrastructure exposed to sea level rise. Link: <https://www.lgnz.co.nz/assets/Uploads/d566cc5291/47716-LGNZ-Sea-Level-Rise-Report-3-Proof-FINAL-compressed.pdf>

Incorporating these signals into infrastructure strategies and Long-Term Plans will be necessary to ensure the infrastructure investment occurs in the right place.

48. The proposed changes to the Resource Management system will be a key factor in planning for climate resilience. The National Planning Framework will provide the national direction and guidance needed to ensure a consistent approach to climate risk reduction and adaptation across New Zealand. Spatial strategies that direct future investment will also be critical to ensure both that infrastructure investment mitigates community risk to climate hazards and financial risk to local government through stranded assets. The Regional Spatial Strategies proposed under the Spatial Planning Bill will be vital to help determine the level and location of infrastructure investment required. This goes both for the retreat of infrastructure and the provision of new infrastructure to accommodate displaced communities.
49. As a matter of priority, the Government must develop a national spatial strategy and provides tools to restrict further development in areas of high or increasing risk, manage this risk and facilitate the retreat of communities, homes and infrastructure in areas where risks are intolerable.
50. We highlight the lack of inclusion of local government and the actions required to implement many of the proposed policies under this chapter. There appears to be a lack of consideration of the dual role of local government to both determine the activities of an area (and the necessary infrastructure required to service those activities) and as a provider of infrastructure. We support the critical and supporting actions contained within the infrastructure section but recommend that the central government works with local government to ensure the policies and plans are implementable. For example, Taituarā supports the development and implementation of the Waka Kotahi Adaptation Action Plan but strongly encourages Waka Kotahi to work with local government to co-design and then co-implement the plan. Local government also manages transport infrastructure and the opportunity to ensure integrated decision making should be seized. Furthermore, the risks to assets and signalling of the resilient infrastructure investment identified in the plan will be key considerations as future regional land transport plans are being developed. Partnering with the local government sector early in the development of the Waka Kotahi Adaptation Action Plan will allow for barriers to implementation to be identified early and will result in policies that are fit for purpose.

Recommendations

That local government's role in planning for and providing infrastructure is better acknowledged.

That local government and Iwi/Māori co-design the Plans and Guidance proposed under this section.

That officials work to ensure robust national direction on climate adaptation is provide for in the National Planning Framework and in a national spatial strategy.

Communities

51. Taituarā supports the prioritisation on social cohesion and inclusion throughout the Communities section. This will be crucial to communities building adaptative pathways. Taituarā agrees with the actions proposed under this section. However, we feel improvements could be made to the teaching and learning and food security actions.

Teaching and learning

52. We strongly support this action and recommend that this be upgraded to a key action. Public acceptance that climate change is a genuine phenomenon with an anthropogenic cause is generally high (76 percent in one survey we've seen accepted the proposition that climate change is a problem). But it is not universal. Getting climate change into the curriculum is a long-term measure for overcoming climate change denial and resistance to taking action. But short term we need an adult education component as well to work on those who take the decisions that create emissions, buy or not buy insurance etc.
53. We add that teaching and learning has a more general role in an adaptation plan. Teaching and learning is a fundamental for building personal resilience and life skills (e.g. financial literacy) that generate the personal capacity to adapt that will form a cornerstone of adaptation.

Recommendations

That all teaching and learning programmes related by climate change incorporate an assessment of adult learning needs and principles.

That strengthening teaching and learning related to climate change be designated a key action.

Food security

54. The document quite correctly notes water security as a risk from climate change, but appears to be largely silent on food security. Although there is a Future Fibres Fund included in the list of actions there is no overarching framework for dealing with food insecurity. Yet we know that changing wind, rainfall and temperature patterns are likely to change the suitability of parts of New Zealand for different types of primary production. The Covid-19 pandemic has also highlighted the vulnerabilities that being the last stop on the planet can create for supply chains.
55. We have seen estimates that around 14 percent of NZ is food insecure.⁵ And what research we've seen tends to be focussed on the present needs and drivers. An adaptation plan needs to reflect that this issue will not go away – and indeed present rate of increases in food prices will bring this into further relief. The adaptation plan needs to add in actions around assessing/forecasting the demand for food, and undertaking a stock take of the amount of land suitable for meeting needs in future. The purpose of which is to identify any shortfalls and likely issues. (And completing the supply chain review wouldn't hurt).

Recommendations

Those actions around forecasting the nations likely food requirements, and a stocktake of land available to meet these requirements be undertaken

That completion of the freight and supply chain strategy be moved to a key initiative.

Economy and financial systems

56. Taituarā supports building resilience in our economy and financial systems. The Draft Plan identifies the economic risks that climate change is bringing. Putting a price on carbon, investigating carbon taxes and charges, and driving a circular economy will address some key flaws in our economic model. The current economic system is not resilient to market changes, so nor can it ever be resilient to climate change. We support these actions to help adapt our current economic system in the Draft Plan, but also think the opportunities to build resilience in local economies and address social inequity should be strengthened in the Final Plan. As we will never know when, where and to what scale or what level of destruction the next climate disaster will hit, we need to build diverse economies and food systems needing not only diversity on a global, national and local economic scale, but that are also diverse in the way

⁵ See Huang, Corneau et al (2020), Food Insecurity in New Zealand.

that community's benefit (as opposed to only the current system that continues to profit shareholders and drive the economic divide). We know climate change will exacerbate global supply chain issues and we must improve our local sustainable production opportunities for a more resilient economy. More work needs to be done by the government in liaising with regional and local development agencies to understand how their work can be leveraged to localise some of the actions identified in the draft NAP.

57. Furthermore, there is a missed opportunity to develop a cyclical funding mechanism where revenue from the ETS is used to support adaptation action across New Zealand. We would encourage exploring this option further.

Recommendations

That the government works with local development agencies to develop the resilience of regional economies.

To investigate using ETS revenue for adaptation activities.

The monitoring and evaluation framework needs further development

58. A DAPP process is dependent on regular monitoring and evaluation both of progress against the plan's objectives, and the effectiveness of the plan in promoting climate change adaptation. This is the basis for the feedback loops that are critical to a DAPP process, indeed without good monitoring and evaluation a plan can no longer be truly called dynamic.
59. The plan is a useful statement of the intended nature and levels of the overall system response i.e. that New Zealand needs to change the way institutions respond, provide better information and embed resilience into its planning. It is therefore entirely appropriate that the plan includes indicators that demonstrate that the system is making change.
60. Loosely speaking these might be termed output indicators and they would include indicators such as a particular policy review having been completed, legislation enacted and so on. The indicator set in Appendix 3 generally does this quite well.
61. However, these are indicators of activity. Completing a planned action is no guarantee that the action will/is actually promoting adaptation to climate change. In other words, the plan lacks a framework for monitoring the effectiveness of its actions. We look for indicators of:
- exposure – for example number of buildings in the coastal inundation zone, number of cars on roads or houses built in a flood plain

- capacity – for example, number of alternate routes available to replace a main route at risk of flood inundation, percentage of people with income protection insurance
 - risk mitigation e.g. length of new sea wall or stopbank, use of and investment in nature based solutions
 - readiness e.g. people with emergency 'grab and go' kits, community led adaption plans in place etc.
62. In addition to these types of indicators we recommend that outcome level indicators are used to confirm that the things we are doing are delivering what we thought they would, and that there are additional indicators at the system level to inform us of the health of the system. For example, indicators that illustrate how mindsets have shifted, what we value has been enhanced, the nature and quality of relationships, how the system is learning and evolving and whether there is a more equitable distribution of power and resources.
63. Effective monitoring and evaluation is the difference between a living plan and a dust-gatherer. Putting in the time and effort now will have a payoff in greater public understanding and acceptance of the measures (at least in the medium-term), ensuring the plan survives changes in political direction, and (nor least) in reducing the costs associated with policy failure. It will also provide a basis for the next plan!
64. Whilst we acknowledge the statutory responsibility of the Climate Change Commission as an independent monitor of the plan and is tasked with assessing the impact actions undertaken have on building adaptive capacity, this does not mean that the Plan does not need a robust monitoring and evaluating frameworks. Working with the Climate Change Commission and other partners to clearly identify measures of progress, set targets, and develop indicators for inclusion in the Plan would be beneficial.
65. While commenting on monitoring and evaluation, we note that these frameworks will be critically dependent on local authorities to supply data to support these. For example, local authority x built x new metres of sea wall, or has a survey showing 80 percent of households have a grab and go' kit. The monitoring and evaluation framework must be co-designed and its implementation co-funded.

Recommendation

To work with the Climate Change Commission and local government to ensure the plan's monitoring and evaluation framework be supplemented with measures that

assess the effectiveness of the actions taken to adapt to climate change, that objectives and outcomes are being achieved and the overall system is working.

Managed Retreat

66. The recently released predictions from NZSeaRise highlight the urgency and scale of risks associated with many homes and infrastructure close to the coastline. For many of these communities the risks associated with their homes is beyond mitigation, managed retreat will be the only option. Managed retreat is difficult. People have understandable attachments to where they live. More than homes, buildings and public assets, these are communities. Furthermore, the strong connection of Māori to their whakapapa cannot be understated. As such managed retreat needs to be fully supported with difficult conversations being held as soon as necessary. Clear messages and guidance to communities will be a critical aspect of managed retreat. This will not only provide certainty to affected communities but also work to reduce the level of misinformation surrounding government's managed retreat programme. As such we request that a centralised communications campaign (akin to that for COVID19) is delivered by MfE.
67. Taituarā broadly supports the adaptation process outlined in the consultation document. It provides a clear and transparent framework under which communities can develop long term plans to retreat from unsuitable areas. A coordinated and integrated plan with local government, Māori, and the community involved in its design will be crucial to getting local buy-in to the managed retreat process. Even then the journey will not be easy. In addition to this the enabling legislation will provide certainty to communities and local government. Central government will need to provide more than this legislative framework, however. Financial support and guidance for local government will be necessary to ensure a consistent approach and just transition across Aotearoa.
68. One aspect of the framework that is absent however, is the consideration of adaptation and mitigation co-benefits. Particularly as it relates to how the retreated land should be treated. Land use change is a good opportunity to investigate options for carbon sequestration and improving the resilience of our indigenous biodiversity. For example, rehabilitating contaminated land to be returned to wetlands would not only ameliorate the negative effects of previous development but also sequester carbon. This would achieve the dual adaptation and mitigation goals of the government whilst improving our biodiversity.

69. Adaptation planning and the prospect of managed retreat is already underway for many people in Aotearoa. The impacts of climate change are already being felt and adaptive pathways are already being developed. Local government has a critical role to play in managed retreat. Indeed, the local government sector has already undertaken a number of measures to address the impacts of climate change on communities as a result of severe natural hazard events. Developing a clear legislative framework for the process of managed retreat will provide clarity and consistency to the currently ad-hoc planning process. Providing a robust and fit for purpose legislative framework for managed retreat is a critical action that will determine the success (or lack thereof) of local government's adaptation activities.
70. Local government has been at the forefront of adaptation planning in Aotearoa New Zealand and the insights many councils have gained through their process would be invaluable knowledge to the development of the CAA. Working with the sector to take stock of what learnings have been attained during their adaptation planning processes and what issues may arise that are not covered by the proposed frameworks would be beneficial to the development of the of the CAA. MfE must work with Taituarā to gather the learnings from councils who have undergone adaptation planning to date.
71. The overarching objective of managed retreat should be building resilience and reducing risk to people and places. Taituarā supports the objectives and principles for managed retreat as proposed in the consultation document. In particular we support the objective of maintaining cultural/community connectedness where possible. Ensuring communities of interest remain connected and culturally significant activities can still occur will be critical to the spatial planning local government undertakes. We understand that the National Planning Framework will provide direction for identifying climate risks and developing areas of lower climate risk. This consistent approach and enabling framework will facilitate councils to plan for and develop activities in climate resilient locations.
72. Taituarā agrees with the impact and role of iwi/Māori that has been highlighted in the consultation document. A framework which encompasses not only managed retreat of buildings and homes but also taonga and wahi tapu will be necessary to cover the connections Māori have to places which do not include built structures. This framework needs to encompass (and establish a plan to protect) culturally significant sites which cannot be moved. For example, urupa and whenua burial sites will need to be protected. Further work needs to be undertaken to specifically outline what obligations local and central government have in relation to Te Tiriti o Waitangi.

Recommendation

To work with the Taituarā and the local government sector to ensure the CAA is fit for purpose.

To, in conversation with key stakeholders, crystalise responsibilities and funding options for local government under the proposed managed retreat process.

That central government delivers a communications campaign to inform communities about climate risks and the managed retreat framework.

Summary of Recommendations:

Systems and frameworks

- (1) That the final NAP adopts the Three Horizons Framework and Dynamic Adaptive Policy Pathways approach.
- (2) Incorporate Te Ao Māori and mātauranga Māori into the final NAP and clearly establish the Te Tiriti obligations of government with respect to adaptation planning.
- (3) That MfE works with their colleagues, Māori and local government to strategically align the NAP with other key reforms including Resource Management, Three Waters, and the Future for Local Government.
- (4) Bring forward the development of mātauranga Māori guidance to ensure te ao Māori is incorporated into the development of adaptation plans.
- (5) Bring forward the actions of 'developing mātauranga Māori indicators' and 'establishing an integrated work programme.'
- (6) That all teaching and learning programmes related by climate change incorporate an assessment of adult learning needs and principles.
- (7) That strengthening teaching and learning related to climate change be designated a key action.
- (8) Those actions around forecasting the nations likely food requirements, and a stocktake of land available to meet these requirements be undertaken
- (9) That completion of the freight and supply chain strategy be moved to a key initiative.
- (10) To work with the Climate Change Commission and local government to ensure the plan's monitoring and evaluation framework be supplemented with measures that assess the effectiveness of the actions taken to adapt to climate change, that objectives and outcomes are being achieved and the overall system is working.

- (11) That officials work to ensure robust national direction on climate adaptation is provide for in the National Planning Framework and in a national spatial strategy.

Funding

- (12) That central government works with local government to establish funding for the delivery of the proposed actions.
- (13) Establish a co-funding framework to support delivery of these actions at the central and local government level.
- (14) That central government, in conversation with local government and other key stakeholders, develop a framework for how adaptation costs will be shared.
- (15) To investigate using ETS revenue for adaptation activities.

Working in partnership

- (16) To work with the Taituarā, LGNZ, and the local government sector to ensure the CAA is fit for purpose.
- (17) To, in conversation with key stakeholders, crystallise responsibilities and funding options for local government under the proposed managed retreat process.
- (18) That MfE works with local authorities with experience in adaptation planning to bring a practical perspective to the development of policy frameworks and guidance.
- (19) That the government conduct joined up conversations with local government, Māori and sector leaders to better link actions and deliver co-benefits.
- (20) That the Interdepartmental Chief Executives Climate Change Board become a cross-sectoral board.
- (21) That local government co-designs the guidance outlined in the Plan to ensure the guidance is workable and fit for purpose.
- (22) That the professional development programme delivery is brought forward.
- (23) That local government's role in planning for and providing infrastructure is better acknowledged.



Professional excellence in local government

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