
Sustainability and Community Resilience Committee
ATTACHMENTS UNDER SEPARATE COVER

Date: Wednesday 1 June 2022
Time: 9.30am
Venue: Council Chambers, Civic Offices,
53 Hereford Street, Christchurch

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03 June 2022

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Tēnā koutou katoa

**Submission on Te Mahere Urutaunga ā-Motu: draft National Adaptation Plan and Kia Urutau, and
Kia Ora: Kia Āhuarangi Rite a Aotearoa, Adapt and Thrive: Building a Climate-Resilient New Zealand**

1. Christchurch City Council (the Council) thanks the Ministry for the Environment (MfE) for the opportunity to comment on the draft National Adaptation Plan (NAP) and the Adapt and Thrive proposals.
2. The Council commends the Government on the delivery of the NAP alongside the National Emissions Reduction Plan to ensure that there is a holistic approach taken across climate adaptation and mitigation, and would like to see a similarly holistic approach to ensure that the resource management, three waters, local government, and emergency management reforms are developed in alignment.
3. The Council recognises the need for clear national direction on climate adaptation and welcomes the opportunity presented by the draft NAP to gain clarity about Government's planned actions and priorities to adapt and increase our resilience. However, the Council is disappointed at the short consultation timeframe and minimal efforts to engage widely with communities through this process.
4. The Council encourages MfE to invest more time, resource and effort in its interface with others to ensure it is listening and hearing from all parties. Without this dialogue there is a risk that communities do not provide the necessary social license to undertake the significant reforms that are proposed. In particular, the Council recommends that further engagement occur in advance of the Climate Adaptation Act.
5. The Council has attached a detailed submission, which responds to the consultation questions; and summarises over-arching themes within this letter.

Plan signals direction and actions but work must occur at a faster pace to gain sufficient momentum

6. The NAP sets out a number of planned actions, most of which are already known and scheduled. Therefore, Council questions whether the NAP is sufficiently aspirational to drive meaningful change and is concerned that the timelines signalled in the NAP are too slow to provide the required level of clarity around roles and responsibilities to enable local government and others to act with the necessary level of momentum.
7. In the interim, local government is already working with communities and mana whenua across New Zealand to undertake adaptation planning, using different tools, policies and approaches, and 'baking in' investment decisions that will be in place for decades to come. Council encourages Government to drive reform programmes at a faster pace to reduce the potential for inequities, misalignments, and missed opportunities.

Reform programmes lack clarity for local government roles and responsibilities

8. As signalled in the NAP, significant, complex and wide ranging reform is underway concurrently across resource management, water services, emergency management and the future of local government. Each of these inter-dependent legislative reform programmes impact on the roles and responsibilities of local government, and yet the future of local government is scheduled to be clarified last in the sequence.

9. Local government is being asked to respond piecemeal to multiple consultations, in the absence of a clear picture of the eventual shape of our roles and responsibilities. As a result of this lack of coherence, Council is deeply concerned that inter-dependencies will be missed and unintended consequences will occur.
10. Council seeks earlier guidance around the eventual roles and responsibilities of local government to allow us to operate effectively and, importantly, to ensure that communities and other stakeholders also share an understanding of the final destination of these reform processes.

Disproportionate emphasis on local government's existing roles and responsibilities

11. Government has clearly signalled that the responsibilities and costs of adaptation need to be shared across all parties. Within that context, Council was surprised to note that the NAP places disproportionate emphasis on local government's existing roles and responsibilities, while de-emphasising central government's responsibility to ensure equitable and fair funding and financing of adaptation actions, provide training and support to local government, participate in regional planning, and manage risks to public goods and assets.
12. There appears to be a presumption that central government's role is to only 'support' through legislative change and provision of guidance, rather than taking the central role in planning and implementing risk reduction measures. Council is concerned about the apparent delegation of all responsibility for natural hazards to local government and the simultaneous emphasis on restricting the Crown's fiscal and legal exposure, while remaining silent on the exposure of other parties. The proper approach would be to limit all parties' fiscal exposure by creating a framework for the most cost-effective adaptation decisions, and then, where exposure remains, share this appropriately across parties.
13. This concern is compounded by the lack of any focus within the NAP about how collaboration will occur between central and local government as well as with other parties. Direct involvement of central government is required to drive national alignment and ensure equitable delivery of outcomes sought by the NAP.

With increased responsibilities, come increased costs and resourcing requirements

14. The Council considers that it is well-placed to lead local adaptation planning due to our connections with communities and mana whenua and our knowledge of local environments. However, if central government assigns additional roles and responsibilities to local government through legislative change, there must be commensurate allocation of funding to enable resourcing of these responsibilities.
15. We note that in accordance with s5ZS(4)(f), 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 point is critical because 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.
16. The Council would like to see the establishment of a centralised funding pool that distributes general taxation equitably and fairly across the regions that need it most in a model akin to Waka Kotahi's National Land Transport Programme. As with land transport funding, local government should contribute a local share based on considerations such as benefits-realization, size of the local ratepayer base, and relevant levels of exposure. While the Council acknowledges that central government cannot bear all costs of climate adaptation, neither can local government.

Design tools, guidance and policies with end users

17. The Council welcomes the commitment to delivering data, information, tools and guidance as these are critical to creating efficiencies and delivering adaptation planning in an equitable, nationally consistent manner. However, these will only be useful if they are co-developed with end users, and delivered in a more timely way than is currently signalled.
18. The guidance provided to date by MfE has been insufficiently implementation-orientated to support delivery of outcomes. There may be opportunities for central government experts to be embedded within local government to share their knowledge and expertise but importantly to also build a better understanding of the local government operating environment and local context. The Council urge central government to adopt a more collaborative approach to addressing the collective actions needed to create momentum by seeking

out opportunities to pool expertise and resources from central and local government, iwi, communities and the private sector.

Canterbury earthquake experience should directly inform the Climate Adaptation Act

19. Christchurch has experienced New Zealand's most significant managed retreat through the Crown's red zoning process. Each component of a managed process has been tested and hard lessons have been learned. Impacted residents and agency practitioners were faced with some of the greatest challenges of their lives in working through such a novel process at a time when the city was continually still experiencing aftershocks. In light of this, the Council was surprised to note the limited references to learnings from the Christchurch experience in the Adapt and Thrive document.
20. In respect of the expertise that sits within agencies and communities in Christchurch, the Council seeks the opportunity to help inform the development of the managed retreat legislation with a particular focus on ensuring we learn from the past. Council would welcome the opportunity to engage in detail and looks forward to hearing from MfE in response to this invitation.

Take a more community-centred approach

21. People and communities are at the heart of the NAP and yet as noted above, there has been an absence of any genuine attempt to engage communities in the consultation process. People should be able to easily understand the system-wide reform programme, and have a clear picture of the roles and responsibilities of all parties, including their own responsibilities. The Government needs to take a greater role in building hazard literacy and understanding of climate science and impacts across people of all ages. It's critical that the Government take people along the journey.
22. Core to this, is the urgent clarification of compensation arrangements for managed retreat. At present, private property owners in at-risk areas have no port of call, which creates anxiety and increases distrust and loss of confidence in institutions. The Council calls for early disclosure and consultation of the Government's plans in this respect.

Conclusion

23. In conclusion the Council is seeking the following:
 - Act with greater urgency and aspiration, and speed up central government delivery of actions
 - Cut through the complexities and iterative nature of the wider reform programme and provide local government with early clarity of our future roles and responsibilities
 - Take a leadership role in delivery and act as a responsible partner with local government by front-footing fair and reasonable funding arrangements commensurate with our responsibilities
 - Design tools with end users – we know what is needed for successful implementation, and our skills are integral to the success of this work
 - Listen to communities, learn from communities, be upfront with communities to prepare them for the future
 - Respect experiences of the past – learn from the people involved in the Canterbury Earthquakes and red-zoning processes
24. Thank you again for the opportunity to provide feedback.

For any clarification on points within this submission please contact jane.morgan@ccc.govt.nz

Yours faithfully

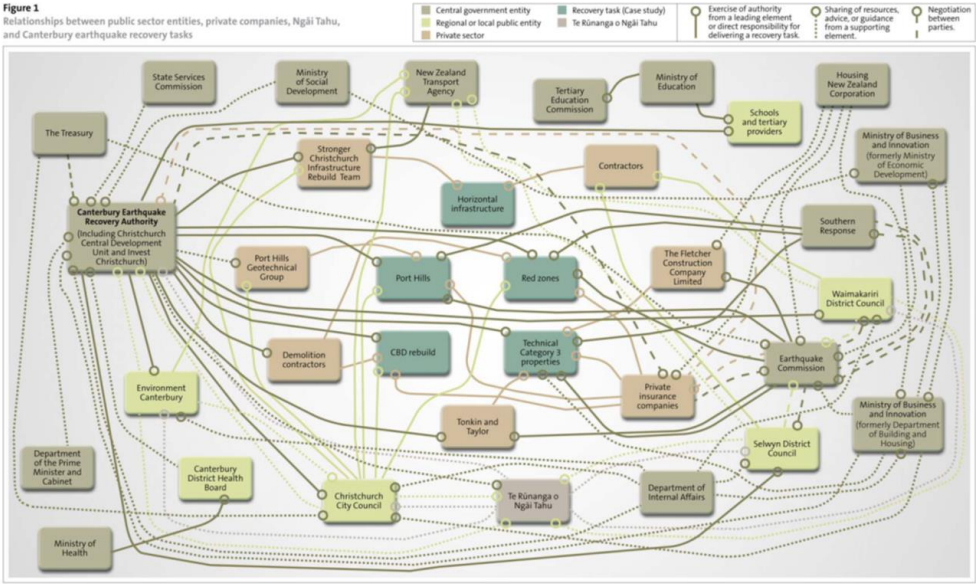
Signed by either GM (staff submission) or the Mayor (Council submission)

Christchurch City Council Submission: draft National Adaptation Plan and Adapt and Thrive: Building a Climate-Resilient New Zealand

General questions	
51. Do you have any other thoughts about the draft national adaptation plan that you would like to share?	<p>The Council is responding to this question first as it provides an opportunity to comment on over-arching issues not addressed in other questions.</p> <p>Engagement</p> <p>The Council considers that the consultation period was too brief to allow for the meaningful engagement with stakeholders and communities that both the NAP and managed retreat proposals deserve. Opportunities for engagement with communities and local government appear to have been limited to two webinars each, which, given the national scale of upcoming change, is perfunctory by any measure.</p> <p>We encourage MfE to invest more time, resource and effort in its interface with others to ensure it is listening and hearing from all parties. Without this dialogue there is a risk that communities do not provide the necessary social license to undertake the significant reforms that are proposed. In particular, the Council recommends that further engagement occur in advance of the Climate Adaptation Act.</p> <p>Compounding our concerns about the limited reach of the engagement to date, are concerns that insufficient time has been allocated to meaningfully incorporate feedback on the NAP in advance of an August 2022 publication date.</p> <p>NAP structure</p> <p>The Council welcomes the NAP as a document that sets out the Government's plans, providing a level of transparency and clarity for communities and stakeholders. However, while the NAP lists these plans and actions, there is little clarity about the inter-dependencies between the actions, and how they will be coordinated. There is also no overall description of how the adaptation objectives will be met.</p> <p>Similarly, there is no holistic overview between the chapters. Yet these are highly integrated systems that need to be thought of in tandem, for example, the interface between communities and infrastructure does not seem to be fully explored. Even within chapters, a more holistic view needs to be taken.</p> <p>We suggest that in future, the NAP includes numbering to reduce the challenges in referencing feedback against components of the document. In addition, testing of the consultation questions might have produced a shorter set of more sharply defined questions.</p> <p>Concerns with the process of developing the NAP</p> <p>The Council is concerned about the process that the Minister undertook to establish the draft NAP. The Minister is obliged to take a number of matters into consideration when developing the NAP (s5ZS(4)), including any response from a s5ZW request. While the Minister is not <i>required</i> to issue a s5ZW request, if he had done this, it would have enabled a more informed draft NAP. Without knowing what steps local government (or other reporting organisations under s5ZW) are already taking (which would be provided under s5ZW(1)(c)), the NAP cannot ensure consistency with the steps already taken, or recommend an alternative approach.</p> <p>In accordance with s5ZS(4)(f), the NAP should be more explicit around funding of the proposed actions. In particular, where local government is expected to fund an action, this must be stated. The NAP talks about setting clear roles/responsibilities for different entities. As noted elsewhere in our submission, having sufficient funding to carry out these actions is a critical concern of entities where they are given new roles or responsibilities and without front footing funding, the NAP is setting up organisations such as local government to fail with their adaptation action.</p> <p>There is no line of sight to the NCCRA risks and we encourage future versions of the NAP to more clearly connect actions to identified risks.</p>

	<p>Disproportionate emphasis on local government roles and responsibilities</p> <p>While the NAP has extensively and repeatedly cited the roles and responsibilities of local government there seems to be a lack of appreciation for the complexities of how local government operates. Currently, we do not have constructive legislation or policies that we can use to fulfill our responsibilities, nor is the local government governance structure set up to support effective long-term decision making. In addition, our ability to raise funds is reliant on ratepayers support through Long Term and Annual Plan consultation cycles. There is typically little appetite for rates increases and this hampers our ability to deliver on responsibilities to the fullest extent possible.</p> <p>In this context, the Council notes several instances in which local government roles and responsibilities have been cited before some of the consultation questions while central government responsibilities such as funding and financing arrangements, providing training and support to local government, participating in regional planning, and managing the risks to public goods and assets were omitted. This places disproportionate emphasis on local government responsibilities while de-emphasising central government responsibilities and we request a more balanced narrative in the final NAP.</p>
1. 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.	<p>Climate change will impact the built and natural environments of Ōtautahi Christchurch through extreme heat events leading to droughts, wildfires and water supply issues, and extreme rainfall events and sea level rise leading to flooding and erosion which have flow-on effects such as decreasing the efficiency of our stormwater system, encouraging 'coastal squeeze' and prohibiting road access to isolated communities.</p> <p>We have undertaken a Climate Change Risk Screening process which has identified the risks and vulnerabilities our district may face as our climate continues to change. The consequences of these changes are widespread and multi-faceted. Some considerations are below:</p> <p>Community concerns</p> <p>Low-lying coastal and inland communities who are already prone to river flooding, coastal flooding, coastal erosion, and rising groundwater are increasingly concerned and anxious about their future. Much of this concern is driven by uncertainties about when and how impacts will be felt; whose responsibility it is to address these impacts, and who will pay for adaptation costs. Understandably, homeowners are worried about the equity in their property, and their future insurability; and renters may become increasingly concerned about their ability to find affordable housing in the future. Communities are looking for reassurances now; and local government is not in a position to provide the clarity they are seeking.</p> <p>The legacy of the Canterbury Earthquake Sequence has exacerbated these issues. Some of the hardest hit communities were in low-lying areas along the rivers and coastlines of the east of Christchurch and these areas are now susceptible to sea level rise in an unfortunate double whammy for those who have already experienced the challenges of rebuilding and repairing their homes and communities. Some members of these communities feel dissatisfied with earthquake repairs, leading to a distrust of the Council and the Government.</p> <p>However, it's important to acknowledge that communities are also not united on climate change topics and for many people the immediate pressures of Covid-19 and the increased costs of living are of greater priority.</p> <p>Many community organisations are cognisant of climate change and will be able to adapt by modifying their services, while others may be concerned that they will not be able to afford to make the necessary changes.</p> <p>The Council's ability to deliver against historic levels of service for infrastructure</p> <p>The Council's three waters and transport infrastructure will become increasingly vulnerable to climate impacts. Some low-lying coastal and inland communities are already experiencing the impacts of more frequent and extreme storm events with flooded roads and ponding water. Parts of Christchurch have experienced dry weather flooding during extreme tide events or prolonged surface ponding at times of extreme groundwater levels. These temporary inconveniences will become more frequent but communities are already signalling to the Council that these impacts are unacceptable.</p>

	<p>The practical and financial challenges of meeting people's expectations of historic levels of service will only grow for the Council. In a low trust post-earthquake environment there is little community appetite for a hard conversation around the trade-off of either decreasing the level of service provided, or increasing rates to enable us to continue to deliver at historic levels of service. This challenge is compounded by the community desire to have certainty on future outcomes.</p> <p>Emergency responses</p> <p>Climate change is already starting to impact on the Council's emergency response capacity. We expect the rate of change to accelerate. There will be greater frequency, duration, extent and intensity of emergencies and potentially novel events, leading to more plans, staff and resources needed to prepare for, respond to and recover from them. We expect to see more concurrent events – leading to reduced levels of service, responder fatigue and reactive responses as time between events doesn't allow for risk reduction efforts to be implemented.</p> <p>While NEMA has been supported with additional resourcing, all declared emergencies require significant local CDEM and other resources. These resources are often heavily reliant on volunteers and this may become increasingly unsustainable going into a future of more frequent, more intense natural hazard events. The emergency management sector, at all levels, needs to expand in size and capability ahead of the threat of climate change.</p> <p>The Council's operations</p> <p>Like organisations across the country, the Council is responding to business as usual demands and the need to pivot quickly to start facing the challenges of climate change. Every aspect of the Council activity needs to be reconsidered, from the criteria used to assess candidates for Long Term Plan (LTP) funding, the engagement we need to have with communities about climate changes issues, through to the impacts on the Council buildings where HVAC operation patterns need to shift to more cooling and less heating. The Government's reform agenda and the significant changes signalled in that also place significant demands on our resources to respond at pace to engagements and to align current work with the new direction.</p>
2. The national adaptation plan focuses on three key areas. Please indicate which area is most important for you:	<p>The Council believes that each of these focus areas are important and need to work together.</p> <p>Focus area one: reform institutions to be fit for a changing climate</p> <p>Focus area one is of critical importance. Existing roles and responsibilities of institutions are confused and set out across multiple statutes. However, the roadmap for the current reform programme is also lacking cohesion and clarity, with concurrent legislative processes each impacting on the future roles and responsibilities of local government. The Future for Local Government review and subsequent reform process will be fundamental to determining the role local government can play in climate change adaptation and yet the clarity this signals is not due until April 2023. Earlier guidance around the eventual roles and responsibilities of local government is needed to provide a less opaque picture for local government and enable effective feedback on the wider reform programme.</p> <p>In Christchurch we are particularly focused on the criticality of a simple and clear set of roles, responsibilities and accountabilities, given our post-earthquake experiences in which communities and agencies were hindered by an opaque, confusing and complex agency ecosystem. By way of illustration we attach a diagram below that outlines the relationships between central and local government, iwi and the private sector in the post-earthquake recovery environment. These myriad relationships left communities and agencies unclear on accountabilities, resulting in a loss of trust in institutions as well as well as wasteful conflict between institutions. We encourage central government to undertake a similar mapping process to test whether the current reform process is leading us towards greater or lesser clarity than this.</p>



The Council is concerned about the time required to introduce and pass new legislation. Local governments are continuously making decisions that 'bake in' our future approach to adaptation. Decisions made now will have an effect during the NAP implementation period. The NAP should provide interim guidance that enables local government to operate in alignment with systems pending reform to avoid interim decisions needing to be unwound.

The institutional and legislative reforms represent a huge workload for local authorities. Many will not have the resources to adequately implement the reforms. Government should consider special funding support for additional resources and deepening of skillsets in local government.

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

Focus area two is also highly important and would be most beneficial for communities if accompanied by a focus on education and hazards literacy.

End-users should be included in research design, development, testing and delivery to ensure that outputs meet the needs of their intended audience.

Partnership principle

"Collaborate – Adapt in partnership with iwi, hapū, Māori and all New Zealanders."

The Council was concerned to note that this principle references partnership with mana whenua and "all New Zealanders". The Council would support the inclusion of a standalone principle that acknowledges the primary importance of the Treaty partnership.

<p>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 government and central government should play in:</p> <ul style="list-style-type: none"> • Improving resilience to the future impacts of climate change? • Sharing the costs of adaptation? 	<p>Collaboration between asset owners, banks, insurers, the private sector, utility providers, local government and central government to build trust is key, and all parties should take responsibility for improving resilience going forward, and for sharing costs.</p> <p>We recommend the establishment of a centralised funding model that allows for fair and equitable distribution of funds to areas of greatest need. This could broadly mirror the Waka Kotahi model for transport funding in which regionally-prioritised projects are submitted for subsidization at 'local share' rates determined according to factors such as population base and levels of exposure. A 'local share' could be contributed by local government, and consideration could be made of a contribution from other parties such as insurers. An approach like this would help to spread funds from general taxation to areas of greatest need, using agreed criteria and with a shared mandate and accountability for outcomes across both local and central government.</p> <p>Local government</p> <p>While the Council acknowledges that central government cannot bear all costs of climate adaptation, local government also cannot. The NAP states that adaptation costs are to be "shared", but does not specify the legislative basis for 'sharing' or in what proportion and for what assets 'sharing' is to occur.</p> <p>Central Government determines the role of local government through legislation; and local government therefore has little choice about the extent to which it is responsible for adaptation actions and associated costs. The NAP seems to indicate local government will pick up additional roles and responsibilities in the delivery of adaptation actions, but is silent on whether this will be support by additional funding. Additional funding would be critical because the only funding mechanism currently available to local government is raising rates. This mechanism is not palatable to communities and is subject to consultation processes, making it an unreliable source of funding to cover the inevitable cost of additional responsibilities, and can lead to short-term outcomes.</p> <p>If central government elects to take a greater level of responsibility through the legislative reform process, funding can be gathered through general taxation. The Council consider this a more appropriate mechanism for funding adaptation than a reliance on rates increases. We are all responsible for the emissions that have driven climate change and we should therefore all share some responsibility for the funding of adaptation actions.</p> <p>Funding from tax revenue has the additional advantage of being able to be spread across areas that need it most. We cannot keep relying on local government to raise rates, especially in areas with smaller populations or with disproportionately higher levels of exposure. Furthermore, there is pressure to consider targeted rating, raising further questions around equitability particularly when lower socioeconomic communities are at risk.</p> <p>Banks and insurers</p> <p>The Canterbury Earthquakes demonstrated the importance of alignments with the banking and insurance industries in hazard-related matters. However, the NAP lacks sufficient detail about the opportunities for partnering with these sectors; and mechanisms for stimulating innovation from these sectors.</p> <p>The Council notes that adaptation actions such as seawalls and bunds are funded almost exclusively by local government through ratepayer contributions, yet the benefits of these risk reduction activities accrue to banks and insurers (in addition to private asset owners). Banks benefit from the added resilience to assets they have lent on; and insurers are able to maintain a viable market for insurance as a result of this risk reduction activity.</p> <p>While ICNZ have been vocal in communicating climate change and hazard risk to communities, we are yet to see the same leadership by the banking sector. In both cases, once banks and insurers withdraw from high-risk areas, a strong signal will be sent to communities about their long-term viability.</p> <p>The Council would like to see a more collaborative approach between local and central government and these sectors to consider opportunities for a fairer cost-sharing arrangement; and we would like to see the banking and insurance sector report with greater transparency about changing insurance policies and lending retreat.</p>
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	<p>Developers Currently, those who develop in at-risk areas take profit with the consequences transferred to the buyer. Should they share in these consequences? Central government, through the RM reforms can strengthen direction to avoid development in at-risk areas to avoid increasing our collective exposure.</p> <p>Private asset owners The Council is cognisant of the complexities of establishing a cost-sharing arrangement with private property owners. Precedent has been set in Christchurch as a result of the red-zoning offer that people would be fairly compensated by the Crown for managed retreat. This precedent will be challenging to unwind. While some commentators suggest that private asset owners should be solely responsible for their own assets, there are very few New Zealanders who can afford to abandon their homes and businesses in at-risk areas and rebuild elsewhere with no public assistance.</p> <p>However, some form of cost-sharing is needed to send a strong signal to asset owners that there are consequences to building in high risk areas. Ultimately, asset owners are responsible for their own decisions. The pressure on local government to maintain current property values in at-risk areas is not sustainable and should not be viewed as a responsibility of local government.</p> <p>Any decision to ‘draw a line in the sand’ and place greater responsibility on private asset owners should be socialised well in advance of implementation and based on extensive community engagement. Any corresponding compensation model should operate on a sliding scale to avoid perverse outcomes.</p> <p>Utility and transport providers Adaptation plans are likely to require modifications to utility services and transport corridors, through relocation, reinforcement or abandonment of assets. The costs associated with these modifications could fall to local government as the implementation of the plans is likely to involve Council decision-making. Wider legislative reform may be necessary to enable effective cost sharing for impacts on utility providers and transport corridor operators, who have built in at-risk areas. In addition, local government may need to be protected against future loss in profit claims associated with changing land use.</p> <p>Intergenerational issues The Council would like to see consideration of intergenerational equity issues. Typically, local government debt-funds infrastructure such as stopbanks and these costs are shared across future generations who will also benefit from these services. However, it is inappropriate to shift the financial burden to future generations who bear no responsibility for climate change. It is also inappropriate to continue to rely solely on unsustainable ‘protect’ measures that increase that burden through ongoing maintenance costs and loss of natural environments. Consideration of these issues and further direction on these matters is critical and could be addressed through the development of a National Adaptation Framework (see Q.7).</p>
<p>5. The National Climate Change Risk Assessment recognised that there may be economic opportunities in adapting to a changing climate.</p> <ul style="list-style-type: none"> What opportunities exist for your community or sector? 	<p>The Council supports the focus on seeking opportunity from adaptation and provides the following thoughts:</p> <ul style="list-style-type: none"> Innovation across all sectors can help to reduce emissions, make systems more efficient and save money. For example, in the energy industry, central government can enable and support a shift towards distributed energy generation and feeding excess energy back into the grid. Canterbury has a highly productive and diverse agricultural economy. Changes in climate are likely to create opportunities to grow new crops either instead of, or in addition to existing crops. It will also increase the investment in the security of supply of water for irrigation. Investment in innovation and technology on farms to increase efficiency may also lead to economic benefits in business and community continuity. Another opportunity is the increased efficiency and reliability of transporting people and freight through an improved transport network that mitigates climate change related disruption, creates new transport assets, and provides alternative transport modes. New forms of construction such as adaptable buildings and using resilient materials can deliver a range of benefits to human health and increased life time of homes. The government could support this by supporting industry research and investment.

	<ul style="list-style-type: none"> Investment such as replacing or upgrading HVAC systems with more efficient systems can help adapt to a changing climate and reduce energy costs. The Council believes that central government has a leading role in investigating and implementing these opportunities due to their central roles in functions such as health, business and tourism etc.
System-wide actions	
6. Do you agree with the objectives in this chapter?	<p>The Council agrees that these objectives broadly form the necessary foundation for climate adaptation actions. The Council has the following comments:</p> <p>Objective One – Legislation and institutional arrangements are fit for purpose and provide clear rules and responsibilities Undertaking such extensive legislative reform concurrently creates uncertainties, sequencing challenges, and risks misalignments. Local government is responding to each legislative change in the sequence determined by central government without a full picture at the outset of our future role and responsibilities and those of other parties. It is therefore difficult to assess whether the reform programme will deliver against this objective.</p> <p>To illustrate this point, the three waters reform creates practical challenges for embedding climate adaptation into functions that are currently integrated. For example, flood management relies on land use planning to set aside stormwater management areas such as wetlands and retention ponds, and planning rules need to be in place to ensure that residential development close to stopbanks and seawalls is managed to reduce risk. Splitting water management and land use into separate entities could therefore risk miscommunication, siloed thinking, and perverse outcomes. In addition, the new water entities introduce an additional layer of decision-making in adaptation planning processes, combined with the challenges of dealing with ‘start-up’ organisations.</p> <p>Objective Two – Robust information about climate risks and adaptation solutions is accessible to all The Council recommends that guidance such as the latest climate projections data should be developed with an emphasis on plain language, using simplified scientific concepts, and should be accompanied by education to build hazards literacy so that all members of the community can assess their risks and take appropriate action. It’s important that the Government front foot misinformation and disinformation and provide leadership on the messaging needed to support the changes signaled in the NAP.</p> <p>Some Christchurch communities have raised concerns about the lack of planning, scientific and other technical expertise freely accessible to help people understand the impacts of hazards on their homes and neighborhoods. While local government has a role to play, our resources are limited and there may be opportunities for central government and academic experts to become more community-facing in this regard. Tools that are available to entities that are subject to the climate-related financial disclosure regime should also be made publicly available for adaptation purposes.</p> <p>Objective Three - Tools, guidance and methodologies enhance our ability to adapt The Council supports the provision of up-to-date guidance and information to support informed decision-making. As noted in the response to Q8, tools and guidance need to be co-developed with end users to ensure they have validity.</p> <p>Objective 4 – Unlocking investment in climate resilience The Council notes that there are no suggested actions related to this objective. As noted, above, if new responsibilities are placed on local government and other parties, these will require commensurate resourcing, funding and clear frameworks for attributing costs between these parties. The Council is interested to see more details in the final NAP.</p>

<p>7. What else should guide the whole-of-government approach to help New Zealand adapt and build resilience to a changing climate?</p>	<p>National Adaptation Framework and centralised funding model</p> <p>We propose the development of a National Adaptation Framework that sets out the roles and responsibilities of all parties, the policy parameters for adaptation decisions; cost-sharing arrangements, and any guidance around the processes for decision-making.</p> <p>A National Adaptation Framework would ensure that everyone has a shared understanding of these aspects of adaptation planning as we move forwards. It would support an equitable and fair approach across the country, and it would allow for clear direction on matters that are currently (and possibly will continue to be) set out across multiple pieces of legislation. Examples of the policy issues that could be addressed within the framework are prioritising naturalised and natural based options in line with the New Zealand Coastal Policy Statement; guidance on any weighting of social and cultural values, and the basis for cost-sharing across parties including management of inter-generational equity issues.</p> <p>As an example of this approach, the Christchurch City Council developed a Coastal Adaptation Framework to provide clarity to communities about how we intend to go about adaptation planning in order to be transparent about our policy settings. For example, our policy principles include <i>Recognise inter-generational equity issues</i>, <i>Prioritise natural and nature-based options</i> and <i>Focus on public assets that contribute to the health, safety and wellbeing of communities</i> (and not the protection of private property). We are being upfront with communities to help manage expectations as we proceed. Having tested this framework and received public feedback we now have a set of policy parameters that will be utilised as evaluation criteria as we assess different adaptation options.</p> <p>To support the implementation of a National Adaptation Framework the Council recommends the establishment of a centralised funding model that allows for fair and equitable distribution of funds to areas of greatest need. This could broadly mirror the Waka Kotahi model for transport funding in which regionally-prioritised projects are submitted for subsidization at 'local share' rates determined according to factors such as population base and levels of exposure. A 'local share' could be contributed by local government, and consideration could be made of a contribution from other parties such as insurers. An approach like this would help to spread funds from general taxation to areas of greatest need, using agreed criteria and with a shared mandate and accountability for outcomes across both local and central government.</p> <p>Coordination between local and central government</p> <p>There appears to be a presumption that central government's role is to only 'support', rather than taking the central role in planning and implementing risk reduction measures. The Council is concerned about the apparent delegation of all responsibility for natural hazards from central government to local government. The NAP seems to confine the role of central government to setting the legislation and providing non-statutory guidance to those who are implementing it, rather than considering whether it would be appropriate for central government to take the primary, community-facing role.</p> <p>We urge central government to strike a more optimal balance between leadership and support. It is inefficient in a small country to delegate all implementation in the absence of a coherent framework that brings together the national strategy and education, policy frameworks, consistent data collation and information requirements and reporting, quality control and sharing of best practice, incentives and matched funding.</p> <p>We are therefore concerned by the lack of any focus within the NAP about how collaboration will occur between the layers of central and local government. The Council notes that the lack of coordination between local and central governments was described as a risk in the National Climate Change Risk Assessment. National alignment is essential to ensure transparent and equitable outcome sought by the NAP, which can only be achieved by central government being directly involved in the process.</p>
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	<p>The Council therefore would like to see additional content in the final NAP that addresses the need for this coordination function to ensure that the NAPs objectives can be met; and to ensure dialogue continues between local and central government partners in relation to delivery challenges such as funding, resourcing, and the appropriateness of tools, guidance and policies.</p> <p>New ways of working for central government Following on from the previous point, we urge central government to adopt new ways of working collaboratively with local government, iwi, communities and the private sector by pooling expertise, resources and experience in a more structured way. While central government collaboration with the research community appears relatively strong, collaboration with practitioners has been poor, and this risks perpetuating a dynamic of insufficiently socialised, central government developed guidance and proposals not being fit-for-purpose for implementation-focused parties.</p> <p>We would like to see an intentional pivot to a co-design approach that creates opportunities for building mutual understanding and sharing best practice through secondments, co-design processes with practitioner networks such as the Aotearoa Climate Adaptation Network, regular conferences and seminars, as well as the default inclusion of practitioners in working parties and steering groups. A co-design approach would recognise that expertise is shared across all parties and enable the collective action required to build momentum to support the outcomes sought in the NAP.</p> <p>Climate-lens across funding for all projects The government needs to ensure that public funding does not go to projects that do not align with its adaptation objectives –e.g. a climate adaptation lens needs to be applied across all proposals before they are approved.</p> <p>Consistency in evaluating risks The government could support in considering risks across domains (for example, a comparison of built and social risks) and providing consistency in approaches when communicating trade-offs with communities.</p>
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?	<p>Co-create tools and guidance with users / standardise to create efficiencies The proposed tools will be critical, but they will only be useful if they are co-developed with end users. Guidance for local government should be co-designed with local government to ensure it answers the right questions, addresses the right challenges, and is fit-for-purpose in the local government context. The guidance provided to date by MfE has been insufficiently implementation-orientated to support timely and effective delivery of outcomes. There may be opportunities for central government experts to be embedded within local government to share their knowledge and expertise and to also build a better understanding of the local government operating environment and local context.</p> <p>It is also important to standardise as many processes and methodologies as possible. Under the current system, local governments are separately purchasing data, assessments and specialised expertise and this is both costly and inefficient.</p> <p>Reducing cost barriers to access climate data We would like to see additional funding for publicly-funded organisations like NIWA that gather climate data, and specialise in assessing and addressing climate risks. Those organisations could then provide ‘no cost’ support to enable local government and others to assess and respond to climate risks in a more cost-effective way. Within the current procurement landscape, these Crown Research Institutes price at a similar level to private sector consultants.</p> <p>Incorporate up-to-date localised information into national datasets / reduce duplication National datasets such as the adaptation information portal should incorporate localised information where this is available, to ensure unique local circumstances are considered and to avoid confusion and contradictory messaging. As an example of the risks of not integrating local information, the SeaRise project’s recently released guidance on vertical land movement excludes land movement caused by the Canterbury Earthquake Sequence, which</p>

	<p>may significantly under-estimate subsidence in some parts of Christchurch. Examples such as this can place local government in difficult positions with communities. Central government are urged to include appropriate caveats alongside the release of data and guidance and consider how information might be received in a local context to help with clear messaging. Downscaling of national studies is important to facilitate engagement with local communities and build trust.</p> <p>We would like assurance that the adaptation information portal will be developed in alignment with EQC's natural hazard risk portal and DIA's LIM review. Communities will need a consistent picture and there is a risk of duplication and/or misalignment with these pieces of work occurring in isolation.</p> <p>Move faster</p> <p>The IPCC's 6th Assessment Report emphasises the urgency required to scale up action across all sectors and we were hoping to see some of this urgency mirrored in the draft NAP. Local government is already undertaking adaptation planning and require tools and guidance immediately. Delivery of a scope only for the adaptation portal by late 2023 is too slow. Existing information (for example the 2021 Christchurch District Coastal Hazards Assessment) can, and should, be collated this year. As noted at p29 <i>"We will never have perfect information on climate change until it is too late to act"</i>.</p> <p>Similarly, the production of guidance on preparing adaptation plans by the end of 2026 misses the boat by several years when local governments are already developing adaptation plans with local communities. These plans will inform investment that will be in place for decades to come.</p>
<p>9. Are there other actions central government should consider to:</p> <ul style="list-style-type: none"> • Enable you to access and understand the information you need to adapt to climate change? • Provide further tools, guidance and methodologies • Remove barriers to greater investment in climate resilience? • Support local planning and risks reduction measures while the resource management and emergency management system reforms progress? 	<p>Roadmap and early clarity for local government on roles and responsibilities</p> <p>In response to Q2 and Q6, the Council raised concerns about the absence of a clear picture of the eventual shape of local government at the conclusion of the reforms process. The Council is concerned about the time required to introduce and pass new legislation and requests that the NAP provide early guidance on roles and responsibilities pending these reforms. Local government is continuously making decisions that 'bake in' future approaches to adaptation, including decisions which will have an effect during the NAP implementation period. The NAP should provide guidance now on future roles and responsibilities and require that local government operates in alignment with proposed reformed systems pending reform.</p> <p>Who pays / barriers to investment in climate resilience</p> <p>The NAP and associated managed retreat proposals are assertive about the need to 'share costs' but silent on the details of the proportionality of that sharing. The Council appreciates that the question of 'who pays' is complex, however until there is a clear answer it is unrealistic to expect that adaptation actions will occur at the necessary pace or with the most desirable outcomes. The Council is engaging with communities at risk of sea level rise; and using the <i>2017 MfE Coastal Hazards and Climate Change guidance for local government</i>, it is anticipated that the full suite of adaptation options will be explored. However, in practice there are no identified funding streams for managed retreat or for accommodation options such as raising floor levels on existing homes. Communities may therefore continue to seek solutions that have had a funding source, for example protective measures such as seawalls. This creates an unbalanced platform for planning and may lead to maladaptive responses and poor environmental outcomes.</p> <p>In addition to the lack of clarity about who pays, there is currently a lack of consequences for choosing not to invest in climate resilience. For example, developers can build homes that are poorly prepared for future climate shocks and face no consequences for transferring that risk to buyers. The Council considers that consequences should be addressed in the NAP. This relates to back the importance of swift decisions on a "line in the sand" being drawn, both geographically and by a certain date whereby investing in at risk areas becomes at the risk of the investor.</p> <p>Bringing the community along on this journey</p> <p>People should be able to easily understand the NAP and associated legislation, as well as the roles and responsibilities of all parties, including their own responsibilities as members of the community and/or owners of private properties. The system-wide reform programme set out in the NAP is significant, but the linkages between each component and the implications of these reforms are not well understood by the general public.</p>

	<p>It's critical that the Government take people along the journey to ensure that there are no gaps between community expectations and central government reforms. Education, awareness raising and the provision of multiple opportunities for people to engage with the NAP and associated legislative change in order to provide 'bottom-up' input should be bolstered.</p> <p>Local government staff and local communities represent the bulk of individuals that have worked through and lived with the risks and decisions associated with climate change adaptation. A range of local adaptation planning processes are currently underway across the country and are increasingly investing in substantial and comprehensive process of community engagement. The NAP would benefit from a similar treatment – a range of iterative stages of consultation with meaningful feedback loops between central government and those councils and communities who have and will continue to work through adaptation planning.</p> <p>Encourage citizen science Associated with the point above, we would like to see greater central government investment in citizen science initiatives. Citizen science can be highly beneficial in measuring trends over space and time due to the large amounts of data that can be gathered over a long period of time, across a large geographic scale, and from multiple sites at the same time. As well as benefitting science, citizen science can improve community awareness, engagement, attitude, behaviour and skills.</p>
11. Are there additional actions that would strengthen climate resilience?	<p>Increasing hazards/risk literacy - individuals and communities, local government, iwi, regional and central government, businesses, banking all need support to better understand the challenges ahead and to help ensure they make informed decisions that increase our resilience as a country. Focus area two needs a stronger emphasis on 'communication and dissemination of information', rather than merely 'provision'. Central government should lead and coordinate the provision of consistent messages about the latest modelling and projections, the likely impacts of climate hazards, consequences for insurability and financial risk exposure and the processes, roles and responsibilities of all parties to respond to these issues.</p> <p>Building community resilience through social cohesion – climate change science and policy is underscored by multiple uncertainties, with different emissions scenarios and the reliance on a global commitment to act. These uncertainties drive divisions within communities, with some people challenging the validity of climate science, and others feeling frustrated and helpless about the future of the planet. There is a risk that the costs of adaptation are unfairly shared, and people with assets at risk are seeking reassurances that their investments are protected. A focus on a just transition is important, as is investment in social cohesion so that communities can support each other through this transition. Some initiatives from the Canterbury Earthquakes, for example the All Right? Campaign, Gap Filler and Life in Vacant Spaces were valuable in strengthening individual resilience and community cohesion.</p> <p>Strengthen understanding between central and local government, iwi and the private sector – As noted in our response to Q7, the challenges we face require novel and innovative solutions built on a shared understanding and trust between parties. The Council would like to see a deliberate programme of collaboration, with practitioners working in the adaptation sector being moved between organisations and agencies. Practitioners who implement adaptation activity and are community-facing should be heavily involved in supporting central government to design tools and legislation, and the technical and policy expertise of central government practitioners could add significant capability to some smaller councils, iwi and rūnanga.</p>
Natural environment	
14. Do you agree with the actions set out in this chapter?	<p>The Council broadly agrees with the actions set in this chapter. However, there is dependency on the National Policy Statement for Indigenous Biodiversity to deliver key climate change actions and build requisite ecological resilience. The prompt delivery of this document with clear actions and outcomes is key.</p>

15. What else should guide central government's actions to address risks to the natural environment from a changing climate?	<p>Under current systems, local government is required to prioritise the maintenance and enhancement of indigenous biodiversity to meet statutory obligations. Aspirational objectives are important, but without the support of clear national guidance and standards, they have remained unachievable. Therefore, the Council would like to see the finalisation of the NPS on Indigenous Biodiversity at pace.</p> <p>There are significant challenges for local government across New Zealand in delivering on these environmental guardianship functions for the following reasons:</p> <ul style="list-style-type: none"> • Tensions in balancing environmental needs against the drivers of intensification and development • Expectations by developers and communities that developments will be consented even in areas where environmental values will be negatively impacted • Funding and resourcing challenges, especially for smaller, rural councils <p>These tensions will be compounded as the changing climate requires both the built and natural environments to move and adapt.</p>
16. Are there other actions government should consider to:	<p>The Council proposes the following actions:</p> <ul style="list-style-type: none"> • Greater integration between government departments such as DoC, LINZ and MPI. For example, the differing approaches to conifer control between the Council, MPI and LINZ has led to greater control in some areas, and planting in others. Another example is the restoration of ecological corridors around streams. Integrated partnerships between agencies could prevent inconsistent and piece-meal management of these areas. • The Council supports strengthening biosecurity. The Council believes that a revamp of the statutory framework that addresses the conservative declarations of pest species and the time lag in declaring pest species would help to do this. • Funding is needed to mitigate the effects of ecological fragmentation and edge effects that will be exacerbated through climate change. • The RMA reforms should make adequate buffer zones around areas of ecological value mandatory to enable effective ecological migration. • The water reforms should ensure that sufficient interaction with local government remains to address local environmental issues around waterways.
18. Are there additional actions that would advance the role of Māori as kaitiaki in a changing climate?	<p>Partnering with mana whenua is key to adaptation planning; however in practice many rūnanga and hapū lack the capacity to respond to the multiple demands placed on them to work in partnership with local government.</p> <p>Building capacity for mana whenua through funding and resourcing mechanisms would help ensure that matauranga Māori and kaitiakitanga are embedded in our climate adaptation planning.</p>
Homes, buildings and places	
19. Do you agree with the outcome and objectives in this chapter?	<p>We broadly agree with the outcome and objectives set out in this chapter. The Council is supportive of a joint adaptation and mitigation approach, as neither can be fully effective without the other. The Council notes that although the second objective states "<i>new and existing places</i>", the majority of the explanation focusses on new buildings. Existing buildings will be some of the hardest to deal with and they should be given appropriate attention.</p> <p>The Council also notes that the section describing how actions across other outcome areas also contribute to the resilient homes, buildings and places could be stronger in respect of the resource management reforms. While the NAP states that "<i>system-wide reforms will encourage a long-term and</i></p>

	<p><i>proactive view</i>”, the term “<i>encourage</i>” leaves the door open to challenging the level of proposed action and could potentially create difficulties with implementation at the local level. There needs to be a <u>requirement</u> to take a long-term and proactive view to account for climate change.</p> <p>This chapter should work alongside the ‘communities’ and ‘infrastructure’ chapters to ensure that an equity lens is applied and to ensure that the built environment is managed holistically, rather than at the scale of individual structures.</p>
20. What else should guide government’s actions to increase the resilience of homes, buildings and places?	<p>The Council believes there should be a greater focus on how to incentivise retrofitting of existing buildings, where this is appropriate.</p> <p>Internationally there are models of public and philanthropic funding that support property owners to build greater resilience into their properties. For example the ‘Build Back Better’ scheme in the UK which offers customers access to reimbursement costs of up to 10,000 pounds, over and above work to repair damage and loss caused by a flood. The funds pay for the installation of flood residence measures that will help householders to return to their homes sooner after a flood.</p>
21. Do you agree with the actions set out in this chapter?	<p>Avoid development in at-risk areas</p> <p>The Council notes that contrary to the 2017 <i>MfE Coastal Hazards and Climate Change guidance for local government</i>, on page 9 of <i>Kia urutau, Kia Ora: Kia āhuarangi rite a Aotearoa, Adapt and thrive: Building a climate-resilient New Zealand</i>, the adaptation options do not include ‘avoid’ as an option. Stronger emphasis should be placed within the NAP on avoiding development in at-risk areas, in addition to the focus on Building Code reforms.</p> <p>Update Building Code performance requirements</p> <p>The Council supports urgent prioritisation of the action to update the Building Code to ensure that minimum regulatory requirements for buildings take climate data into account. However, we note that delivery of this action is not due until 2028.</p> <p>Significant construction is underway and will continue in the absence of this guidance, leaving us with a legacy of new buildings that will not be resilient to future climate impacts. Similarly, we would like to see more urgent delivery of the associated actions: Management of adaptation related to regulatory change, and Design methodology for risk assessments of public buildings.</p>
22. Are there other actions central government should consider to?	<p>Make it applicable locally</p> <p>A coordinated approach alongside local government is essential to ensuring that actions are applicable at local scale. While some issues are nationally applicable, other are location-specific and need to respond to local circumstances, where local government and local communities are the experts.</p> <p>Limit the loss of heritage values</p> <p>Strategies to limit the loss of heritage values need to be included. Built heritage may need to be strengthened for more extreme weather events, designs may need to be modified to counteract new threats such as insect pests, and in extreme cases where heritage items are threatened, relocation to a new site may need to be facilitated.</p>
23. Is there a role for government in supporting actions to make existing homes / buildings more resilient?	<p>Yes, Government support could include making existing buildings more resilient by providing information on the nature of the most appropriate types of works and materials, sharing best resilience and green-energy practice, prototyping and testing new and innovative adaptations, increasing the number of housing schemes for displaced people, and offering financial support through funds or incentives for implementation.</p> <p>The Building Code and other relevant documents also need to support any approaches.</p> <p>Any unintended adverse effects that approaches may have on increasing inequities need to be mitigated.</p>

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?	<p>People located closest to high-risk areas as well as low socioeconomic groups with less disposable income to increase their assets resilience will be most impacted. Therefore we support the following actions in the NAP; build property resilience, establish an initiative for resilient public housing, support kaitiaki communities to adapt and conserve taonga, ensure minimum regulatory requirements for buildings to take into account future climate data, work with community housing providers to enable effective climate hazard responses, and partner with Māori land owners to increase the resilience of Māori-owned land, homes and cultural sites.</p> <p>We would like to see the final NAP more actively address risk through prohibiting the construction of buildings in flood-prone areas, while also ensuring that the strategic planning process provides alternative locations and opportunities for growth and relocation away from coastal hazard areas. Prohibition may need to be linked with managed retreat. There is risk in prohibiting development without managed retreat where communities could stagnate and go into decline. The Council understands that some activities may still need to occur in high-risk areas due to their specific locational or functional need.</p> <p>Coastal structures such as WW2 defences, wharves, jetties and boathouses will be some of the first structures at risk and should be addressed in the creation of plans.</p>
25. What are current barriers to increasing buildings' resilience?	<p>The key barriers are cost, uncertainty, an unwillingness to invest in what is seen as a problem for future generations.</p> <p>It is also difficult to find suitable sites for relocated buildings and Building Code requirements for relocated structures can be demanding and expensive.</p>
Infrastructure	
26. Do you agree with the outcome and objectives in this chapter?	<p>The Council broadly agrees with the outcomes and objectives set in this chapter as they broadly align with good asset management practices.</p> <p>We note that the objectives may be more difficult to achieve in developed areas than in areas of new development. Infrastructure planning and implementation has the opportunity to lead behavior change by making positive change easy and negative status quo more difficult. Extending the outcome to <i>"Our infrastructure is resilient to a changing climate, so that it protects or enhances the wellbeing of all New Zealanders <u>and promotes adaptation and mitigation outcomes</u>"</i> could be one way to acknowledge that infrastructure planning can help facilitate adaptation outcomes.</p> <p>We believe that there needs to be more integrated thinking to achieve a holistic approach with decision-making based upon actual risk. Objective I1 should be broadened to include risk as well as vulnerability throughout the asset lifecycle so that the consequences of failure remain a focus during planning, design, construction, operation and demolition. Consideration of the whole asset lifecycle is important to support wellbeing outcomes and avoid maladaptation.</p> <p>Infrastructure is a system of systems, and systems thinking should be fundamental. However, the NAP perpetuates siloed approaches through the separation of topic areas. For example, demand management could defer costly upgrades and minimise risk of maladaptation.</p> <p>Objectives I2 and I3 recognise the need to take a long-term view in infrastructure decision-making and investment, and this is vital to ensuring that climate change impacts over the long term are able to be adequately aligned with and given meaningful effect through the Councils development of the LTP. It is crucial that central government establish the policies, guidance, methodologies and tools for local governments to facilitate that development within a long-term, intergenerational context, such as through the whole-of-life multi-value assessments of candidates in the LTP formation process.</p>

	<p>Objective I2 could be more directive. Considering and understanding climate impacts does not necessarily precipitate action. A third point to direct infrastructure investment <u>only if it supports adaptation plans and principles in support of community wellbeing</u> would provide a clear signal to infrastructure providers.</p> <p>Well considered asset management will also consider cascading impacts between networks and hazards. A systems approach can help identify interactions and cascades between networks to fully inform vulnerability and fragility. If the word “new” were removed from objective I2 then more holistic thinking would be facilitated and could inform the scope of the critical action to “Develop a methodology for assessing impacts on physical assets and the services they provide”.</p> <p>We also recommend that the text under objective I3 should state “<i>Avoid maladaptive outcomes through well considered asset management. This means considering long-term climate impacts when we make decisions whether/how to maintain, upgrade, repair or replace existing infrastructure</i>”. Deciding that it is time to stop repairing or replacing infrastructure and to allow levels of service to decline needs to be an option in adaptation in order to limit overall costs to the community, and that should be explicit. There is a clear incentive to realise residual value in existing assets, avoid stranded assets and maladaptive outcomes but this will be difficult to achieve within existing frameworks.</p> <p>Maximising value delivered from existing assets will require clear coordination between all service providers. In order to equitably share costs, legislative change may be necessary so that local governments do not have any obligation to make good losses incurred by other utility service providers. For example, service providers may seek compensation for the residual value of assets in areas where their assets that are to be put out of service, abandoned or removed to achieve broader environmental outcomes. In line with the objectives set in <i>Kia urutau, Kia Ora: Kia āhuarangi rite a Aotearoa, Adapt and thrive: Building a climate-resilient New Zealand</i>, an obligation needs to be placed on all utility service providers to make financial provision for delivery of adaptation plans. This issue is also explored in response to Q53.</p>
27. What else should guide central government's actions to prepare infrastructure for a changing climate?	<p>There are currently short-sightings in the NAP where local government's responsibility for water and waste is referred to (such as table 4 on page 65) without anticipating changes that may occur as a result of the three waters and/or local government reform. For example, giving effect to Te Mana O Te Wai may necessitate stronger alignment of adaptation outcomes with wider community and environmental outcomes.</p> <p>We have identified that a new decision-making framework is needed to determine the best approach to at-risk infrastructure investment. Considering climate-related risks when planning for investment in infrastructure will decrease the risk of maladaptation and ongoing costs of maintenance and renewals. We have been unable to find relevant decision-making frameworks or guidance and suggest that there is an opportunity for this to be jointly developed by local and central government.</p> <p>The Council recognises that community well-being and quality infrastructure are intrinsically linked. As such, infrastructure objectives need to align with community outcomes so that the purpose of infrastructure is not lost. This is expressed through Figure 6 of the NAP, however this could be reinforced through the inclusion of the words ‘community well-being’ in objective I2 as follows “<i>considering long-term climate impacts when we make decisions on infrastructure design and investment so the right infrastructure is in the right place to support community well-being, and not in the wrong place</i>”.</p> <p>All government agencies which have an impact on the stated objectives being achieved need to be actively facilitating and supporting the actions identified. Te Waihangā, Waka Kotahi and Treasury have been identified in the NAP. However, to provide the essential direction of the investment and decision making for the longer term, inter-generational infrastructural planning required to adequately accommodate climate change impacts, the development of local government's LTP's must be suitably facilitated by the agency responsible - the Department of Internal Affairs.</p>

	<p>Government should support simultaneous work on adaptation of community, infrastructure and buildings, especially in flood and coastal zones that are high risk and need a dynamic adaptive pathway planning approach. These systems are so interconnected that adaptation of one cannot be done without consideration of the other. For example, a decision to invest in strengthening infrastructure can send a misleading message to the community, and that is maladaptation.</p> <p>Some utility service providers are protected against losses incurred by the actions of others (e.g. adaptation measures taken by local government). However, these actions may be necessary to deliver desired adaptation outcomes. Central government could require utility providers to make financial provision for losses in asset values or future earnings associated with withdraw of service so that costs do not all fall on local government.</p>
28. Do you agree with the actions set out in this chapter?	<p>The Council broadly agrees with the actions set in this chapter. However there is no clear roadmap that signals how the overarching outcome will be delivered over time as the current actions alone will not meet the objectives.</p> <p>We strongly support the action to “<i>develop a methodology for assessing impacts on physical assets and the services they provide</i>”. This is an essential to providing an equitable basis for evaluating options consistently across all jurisdictions for both mitigation and building resilience/adaptive capacity. The action needs to take a whole-of-life approach to effectively capture the climate impacts and enable reliable decision-making based on the life of key infrastructure assets. As such, it will form a key component in the Council’s LTP formation, alongside the results of other priority actions listed in the NAP and in particular the potentially hugely beneficial outcomes from the Treasury action of integrating adaptation into Treasury decisions on infrastructure.</p> <p>The Council supports the action of “<i>scoping a resilience standard or code for infrastructure</i>” with some reservations. This may work for new infrastructure built away from hazardous areas but it is also important to avoid the perverse outcome of requiring costly upgrades of infrastructure in areas exposed to climate risks that may not have a long life or be required for a long duration. It would also be good if this were aligned with the LGA requirements for Asset Management Plans and other LTP documents. Allowing local governments to vary service provision in at-risk areas will minimise costs.</p> <p>We strongly support the critical action to “<i>integrate adaptation into Treasury decisions on infrastructure</i>”. We also would like to see a similar requirement to integrate climate resilience into local government documents, which ultimately dictate how the Council invests in its assets, such as the LTP and in particular the Infrastructure Strategy, the Financial Strategy and Activity Plans. We would strongly encourage the methodology, guidance and tools which are to be applied to the Treasury action be required to be applied to the Councils’ evaluation and decision making on asset investment to ensure integration of adaptation and resilience into the LTP process and into the implementation of the LTP in both capital and operational activities. Continued application of the current, relatively near-term evaluation of LTP candidates based largely on one-dimensional analysis will not allow appropriate integration of the longer term climate adaptation factors and will result in investment decisions which are counter to the longer term, intergenerational well-being of the community. Minimising whole of life carbon should also be integrated into decisions.</p> <p>Under the critical action to “<i>integrate adaptation into Treasury decisions on infrastructure</i>” we support the plan to “<i>set up durable investment management systems and processes to respond to, and fund and finance climate action, with positive climate and resilience outcomes</i>” as current tools are inadequate for infrastructure providers. This action could also include extending funding horizons in LTP financial and infrastructure strategies and could also necessitate securing rating against projects in the future of lower certainty.</p> <p>The Council supports the critical action to “<i>develop and implement the Waka Kotahi Climate Change Adaptation Action Plan</i>”. We ask that lessons learned in developing this plan are shared with local government to inform management of our own assets. Again, we urge simultaneous action plans to</p>

	<p>minimise whole-of-life carbon costs. We also urge thinking that integrates all modes of transport in this plan, working alongside KiwiRail, Maritime NZ and public transport operators.</p> <p>The Council supports the supporting action to “<i>manage dry-year risk through the New Zealand Battery Project</i>”, but urges government to see this as just one tactic in the overall National Energy Strategy.</p> <p>The Council supports the action to “<i>encourage and support the evaluation of climate-related risks to landfills and contaminated sites</i>” and “<i>explore funding options to support the investigation and remediation of contaminated sites and landfills vulnerable to the effects of climate change</i>”. If this work is carried out proactively rather than reactively, it will cost less and take less time. Lessons can be learnt from the Canterbury Earthquake land clearance and the legacy issues of contaminated land. Council would welcome engagement with central government on this and other legacy issues.</p> <p>The Council supports the action to “<i>integrate adaptation into Waka Kotahi decision making</i>”. We also would like to see a similar requirement to integrate climate resilience into local government documents such as the Infrastructure Strategy and the LTP. Minimising whole-of-life carbon costs should also be integrated into decisions. We urge Waka Kotahi to liaise with Kiwi Rail and others on this action.</p> <p>The Council strongly supports the supporting actions to “<i>progress the rail network investment programme</i>” and “<i>invest in public transport and active transport</i>”. This should be part of integrated transport plan.</p> <p>We support the action to “<i>support the integration of climate adaptation and mitigation in new and revised standards</i>”. We urge Government to include this approach in all plans (including the National Energy Strategy) and seek whole-of-life assessments eg. consider the emissions of users as well as those produced building, maintaining and decommissioning the road. If there is an alternative lower emissions option such as rail this should be taken instead.</p> <p>A whole-of-life approach to infrastructure is essential. The assets themselves need to be resilient but the system as a whole and how we use it is crucial; we must not lose sight of the purpose of the infrastructure, being to support vibrant and healthy communities. Having separate plans for different aspects of the system is a useful step, but we need holistic, integrated, transformational change of the whole system.</p>
<p>29. The national adaptation plan has identified several actions to support adaptation in all infrastructure types and all regions of Aotearoa.</p> <p>A. Do you see potential for further aligning actions across local government, central government and private sector asset owners?</p> <p>B. Do you see any further</p>	<p>We would like to see a more complete picture of infrastructure types which may necessitate further actions. Two such areas are traversed below.</p> <p>Stormwater and flood management</p> <p>We note that there is no specific programme of action seeking to proactively integrate the management of flood works such as stopbanks with stormwater infrastructure such as holding ponds, wetlands, and swales and we are concerned that three waters reform will further complicate this space leading to fragmented governance and accountabilities.</p> <p>Flooding from rivers and the sea is already one of our biggest climate impacts, and will likely be exacerbated by sea level rise, rising groundwater and land subsidence. It is very difficult to manage the water without the ability to simultaneously manage the land, including by setting aside sufficient land for infrastructure like wetlands and swales. Leaving stopbanks and other river works outside the scope of the three waters reform creates significant issues as actions such as the proactive reduction of flood risk will fall across the remit of new water entities, local and regional government. Without aligning actions across these organisations, flood management will fail and maladaptive outcomes will arise. We will not achieve the outcomes sought in other reform processes if objectives for adaptation do not extend to consideration of holistic outcomes, including wider land use.</p> <p>In addition, stopbanks can cause increased flood risk unless coupled with appropriately aligned planning rules. A stopbank is designed to protect against a defined size/recurrence interval of flood. When a bigger flood comes the bank will fail or overtop. Planners may assume that now there is a stopbank in</p>

opportunities to include local mana whenua perspectives and mātauranga Māori in infrastructure adaptation decision-making?	<p>place, it is safe to develop right up to the bank. When the bigger flood comes (and such floods are set to become more frequent), there will now be more buildings exposed than before. Alignment of central government resource management reform, three waters reform, local/regional government planning, and the research sector (e.g. NIWA's national flood model project) is essential to successful resilience building in this area.</p> <p>Water supply for irrigation and stock water</p> <p>There is no mention of water supply infrastructure for agriculture, horticulture and viticulture. This is critical infrastructure for a critical industry, and should not be omitted. There is an opportunity for MPI, iwi Māori and regional councils to work with the primary sector, Rural Support Trusts and infrastructure owners to build resilience in the sector and this may require legislative and regional plan reform to allow changes to water allocations in areas that are already, or will become over-allocated.</p>
30. Are there additional infrastructure actions that would help to strengthen Māori climate resilience?	<p>Wastewater options should be climate resilient (e.g. septic tanks and effluent fields should continue to work as groundwater rises, so that sewage does not end up in waterways), and power generation and water collection should be encouraged at marae.</p> <p>Water quality and quantity during drought and after storms needs careful attention in all areas, but is especially important in mahinga kai areas. Mahinga kai values can be enhanced through improved access to traditional harvesting areas, which could be realised through adaptation, particularly with an integrated approach to delivery against the objectives identified in the wider reform programme.</p> <p>There may need to be some thought given to resilience of aquaculture-related infrastructure, including the how to address rising water temperature and ocean acidification.</p>
31. Are there any other tools or data that would help infrastructure asset owners make better decisions?	<p>Investment in infrastructure decision-making tools for the LTP</p> <p>Consistent guidance and tools for supporting the integration of adaptation and resilience building into decision-making for infrastructure investment are crucial. It is imperative that these are made available (even if prepared as a transitional set) to support the development of the next LTP (2024-2034). If this timing does not occur, a 3-year cycle opportunity for making the necessary changes to investment evaluation will be lost, and the challenge for change will be even greater at the next LTP 3 years later.</p> <p>Urban design tools</p> <p>Densifying urban centres in areas of low risk rather than sprawling cities can encourage behaviour change such as decreasing car use. However, this type of planning and design needs to include tools to enable planning with infrastructure providers as it increases demand on existing networks that were designed for a smaller population (for example, the wastewater network).</p> <p>Urban planning guidance also needs to be provided on how to provide enough shade in cities, and how to best utilise unformed legal roads.</p>
Communities	
32. Do you agree with the outcome and objectives in this chapter?	<p>The Council broadly supports the outcomes and objectives set in this chapter. However, as per the Emissions Reduction Plan, the Council believes that a more comprehensive focus on climate change education is also highly valuable.</p> <p>The Council actively supports the teaching of the Climate Change Curriculum in schools in Christchurch and would like to see greater support of this programme and climate change education in general embedded across schools in New Zealand, from early childhood through to secondary. However, its</p>

	<p>just as important, if not more so, to ensure that educational opportunities enable New Zealanders of all ages to be more informed and understanding of the risks of climate change and empowered to make informed decisions and subsequent actions.</p> <p>As mentioned in Q.9, we would support investment in citizen science initiatives that both help to bridge data gaps and improve community awareness, engagement, attitude, behaviour and skills.</p>
33. Do you agree with the actions set out in this chapter?	<p>The Council broadly agrees with the actions set out in this chapter.</p> <p>National direction on requirements for LIMs</p> <p>The action to improve natural hazard information on LIMs is very important and the Council welcomes DIA's leadership in this space. However, the new national direction on requirements for natural hazard information is not due until 2024 and we consider this too slow.</p> <p>S44A of the LGOIMA specifies that information identifying each special feature or characteristic of the land are to be included in the LIM if they are known to a territorial authority but are not apparent from the district scheme or a district plan. Special features or characteristics of the land may include but are not limited to potential erosion, falling debris, subsidence, or flooding. Shallow groundwater may also be a hazard that needs to be included on a LIM. The Council may also include more general information about coastal hazards.</p> <p>Section 44A needs to be more specific about what hazards are to be included. Reliance on discretionary inclusion of information leaves the Council open to challenge, with some community members seeing LIM updates as negatively impacting on property values.</p>
34. What actions will provide the greatest opportunities for you and your community to build climate resilience?	<p>Community resilience can be improved through hazard awareness and increased social cohesion. The following key actions are essential and listed in order of priority: C1 Building community resilience through social cohesion, C1 Expand current funding for proactive community resilience, SW2 Provide access to the latest climate projections data, SW2 Develop 3D coastal mapping, C2 Assess socioeconomic and climate vulnerability for Māori, SW1 Set national direction on natural hazard risk management and climate adaptation through the National Planning Framework, C3 Connect communities to wider response and recovery support, SW1 Modernise the emergency management system, HBP3 and HBP4 Support kaitiaki communities to adapt and conserve taonga/ cultural assets, HBP4 Research how cultural heritage contributes to community wellbeing and climate change adaptation.</p>
Economy and financial system	
38. Do you agree with the outcome and objectives in this chapter?	<p>The Council generally agrees with the outcome, objectives and actions in this chapter but believes they could be more aspirational. While economic risks are well presented, the focus seems to be on maintaining current economic wellbeing via adaptation rather than highlighting and encouraging the potential to use climate change adaptation to build a stronger and more equitable economy.</p> <p>We are seeking clarification on the definition of "wage" on p.85. Do you mean a general high salary/income across the board or increasing the income of wage earners? This approach is also only beneficial if the cost of living does not keep increasing.</p>
40. Do you agree with the actions set out in this chapter?	<p>The Council supports the speedy introduction and expansion of the climate-related disclosure regime. Careful consideration will need to be given as to how the regime applies to public entities – in particular, s5ZW CCRA requests should require reporting to align with CRD requirements/standards to avoid public entities having to report the same information in different formats or to different standards.</p> <p>The action to deliver the national Freight and Supply Chain strategy should include thinking on the production or harvesting of materials in other parts of the world, and the transportation costs.</p>

	<p>The action to “develop options for home flood insurance issues states” that it will explore “options to support access and affordability of insurance for floods”. This should only be the case for older houses similar to the Flood Re scheme in the UK. New assets should bear the cost of inundation or physical protection, or preferably not be located in at-risk areas.</p> <p>Monitoring actions should monitor:</p> <ul style="list-style-type: none"> • Excesses and how they are changing • When premiums become unaffordable • Where people are no longer buying insurance or where insurance has retreated altogether • How flood-related risks are balanced against other risks within an insurer’s overall portfolio • Exposure of the banking sector to debt on uninsured assets <p>Comprehensive reporting on climate risk is an excellent way of increasing awareness of the business sector to their exposure, and could lead to much improved resilience by way of voluntary adaptation. Supporting information and education is critical to allow proper analysis.</p>
41. Are there other actions central government should consider:	<p>Central government could use the tax system to incentivise behaviour change and investment in low-carbon technologies, prioritise investment in low carbon agriculture and processing, work to reduce emissions from transporting large volumes of unprocessed goods, and consider how emissions resulting from the tourism industry can be addressed.</p> <p>Central government should also support the establishment of climate-friendly procurement across the whole economy, not just government.</p>
44. In the context of other risk management options (eg, flood barriers, retreat from high risk areas), what role should insurance have as a response to flood risk?	<p>Flood insurance plays a pivotal role in resilience as it enables the insured party, generally most of the community, to quickly recover from a shock. Without the financial support of insurance then the community would take much longer to recover. The issue with insurance is that it can only be used after damage has been incurred and only to reinstate the property to the condition prior to the event. Inherently it does not reduce the exposure or provide for implementation of adaptation principles.</p> <p>Differential premiums can help support adaptation principles as they are a clear signal that change is required. The differential premiums can be applied based upon the risk not the eventuality of the hazard. Ideally, the cost of insurance should reflect the actual residual risk associated with occupation of the land. If the market is distorted or there is subsidisation across the community then these messages will be diluted.</p> <p>As insurers do not offer contracts for greater than one year there is no incentive to reduce risk to the property. One option to support adaptation would be to lock in longer contracts with incentives to homeowners to manage residual risk. For example, an upfront payment or lower premiums could be made available to a homeowner who has opted to flood proof their dwelling on the condition that they agree to an insured period of five or more years. Alternatively, the ‘Build Back Better’ approach (from the UK Flood RE scheme) could apply in where there is significant residual value in the assets.</p> <p>No matter the insurance approach taken, it should be equitable and fit for purpose. There needs to be;</p> <ul style="list-style-type: none"> • An option for a global, catchment-wide solution, rather than only on a one-by-one property basis • Provisions for land swaps and rebuilds outside of high-risk areas • Provisions to not obviate property owners from moral hazard responsibilities or from prudent mitigation or adaptation responses.
45. Should the Government have a	<p>Yes, central government should have a role in supporting flood insurance.</p>

<p>role in supporting flood insurance as climate change risks cause private insurance retreat?</p> <ul style="list-style-type: none"> Does your answer to the above question depend on the circumstances? 	<p>It may be suitable to offer some government based insurance if it is carefully bounded as it would be inappropriate to incentivise the remaining occupation of land if it is unsafe to do so or if it is contrary to agreed adaptation plans. Insurance would also have to be time bound, for example:</p> <ul style="list-style-type: none"> Only offered to homeowners who purchased their houses prior to implementation of the scheme (or earlier) or possibly homes built before a certain date in order to minimise any risks with supporting inappropriate development or artificially supporting coastal property values. Offered only until adaptation plans are in place and only beyond if they show ongoing occupation of the land is desirable or possibly offered only for a limited time, say 10 years, to enable some residual value to be realised. It may be suitable to only offer sum insured policies that reduce in value with time, to incentivising early action. <p>The Council requires insurance for its own assets. Cost effective insurance for all asset classes will be important while adaptation plans are implemented. As per our response to Q44, the insurance should provide an incentive to flood proofing of infrastructure so losses are minimised. Some preferential value placed on premiums for infrastructure protected by nature-based solutions would support wider policy objectives.</p> <p>As set out above, the circumstances could be the property was constructed or purchased prior to a given date to avoid perverse outcomes. The amount of insurance available could also be used as a tool to limit the wider communities exposure to high value property damage (i.e. there would be a cap on the sum insured). It would be more difficult to extend this application to the Council's assets due to the demand driven sizing of infrastructure.</p>
<p>46. If you think the Government should have a role in supporting flood insurance, how do you envision the Government's role, and how is this best achieved?</p>	<p>It will be critical to maintain the two core benefits of insurance; 1) signalling the need for adaptation and 2) boosting disaster recovery. These benefits could realised through appropriate policy settings and proactive interventions as opposed to being met through insurance. However, the upfront cost of policy approaches may not realise the maximum residual value in the existing assets.</p> <p>Council note the possibility of moral hazard with government agencies being aware of the risk presented, but providing intervention only after the harm has occurred. This involves knowingly allowing harm to fall upon community, particularly if adaptation plans are in place to address the risk but have not yet been triggered.</p> <p>It may be that community adaptation triggers are set at thresholds higher than insurance retreat. If so, and if fully funded adaptation plans are in place then there should be no need for government insurance. The key being the timeliness of both the planning and the interventions, both of which could be supported by government.</p>
<p>47. If the Government were to directly support flood insurance:</p> <p>A. Best way to provide support?</p> <p>B. Should the Government's focus be to support availability or affordability of insurance, or both?</p> <p>C. How should costs of support be funded?</p> <p>D. Benefits and downsides</p>	<p>A: Learning from the Canterbury earthquakes indicate that government funding being applied through private insurance is far more effective for policy holders than dealing with multiple insurers for a single event. An MoU between insurers and the Government could be set up for flood insurance in the same way that one has been created for natural hazards. An alternative approach to this could be to set up an arrangement similar to the Flood Re scheme, however, this cross-subsidises the cost of insurance across the wider community diluting the benefit that differential premiums can achieve.</p> <p>B: The government focus should be on accelerating the planning and implementation of adaptation plans. If interventions are timely and effective then the need for government insurance is avoided. However, if government insurance assistance is required it should be focused on both the availability and affordability of insurance as they are interlinked.</p> <p>D: As described above, there is a moral hazard presented by providing the insurance, however it does provide the advantage of realising some of the residual value of at risk assets.</p> <p>E: As above, temporary based upon a number of potential factors.</p>

<p>of approach?</p> <p>E. Should support be temporary or permanent?</p> <p>F. If temporary, what measures, do you think would be needed to eventually withdraw this support?</p>	<p>F: Successful implementation of adaptation plans.</p> <p>G: This could depend on the scale of the impact the proportion of a community's commercial property at risk. Communities need commercial activities to thrive. If a small community lost all of its commercial property due to the unavailability of insurance then the whole community may be impacted. If it is a smaller proportion then the ongoing viability of the community is far less likely to be questioned. Inherently there is value in commercial activity to provide a vibrant community, and as such, it should be considered. There is also direct harm to operators, staff and owners as a result of climate change.</p>
48. How effective do you think insurance "price signal" is for providing incentives to reduce flood risk?	It is likely to be relatively effective at reducing the incidence of new flood risk but may not work so well for existing risk that increases over time and where the costs of risk mitigation are high. This may see some properties reducing in value over time and being increasingly attractive to those who are not in a position to adequately cover themselves from the risks they take on. The stronger price signals will be more keenly felt by those least able to afford them. This will give rise to a reduction in insurance coverage in vulnerable communities. Having the price signal moderated by deprivation may be one tool to reduce the adaptation burden on the most vulnerable.
49. In your view, should a scheme similar to Flood Re in New Zealand be used to address current and future access and affordability issues for flood insurance?	<p>Yes, it would address insurability but as discussed above, this presents a moral hazard. The better outcome is timely development and implementation of adaptation plans to address the risk.</p> <p>The issue of equity also arises when a comprehensive scheme is used. Both central and local government will be hard pressed to develop equitable policies to support the community when it is more likely for lower socio-economic to be affected more. Any schemes need to factor this in.</p> <p>There are also other potentially effective schemes such as those used in Waitākare City or more commonly in the US where the Government buys properties in at-risk areas and leases them back to owners for as long as they are viable, thereby retrieving some of their investment.</p>
50. How do you think a scheme similar to Flood Re could support or hinder adaptation initiatives?	<p>If appropriately developed, it could support adaptation, however, the funding would be better put towards accelerating the adaptation planning and implementation.</p> <p>There is also the risk that communities will be outraged if the flood management system fails in a larger-than-design event. Communication on what a flood scheme does and does not do is essential for communities and planners to ensure that accompanying actions are appropriate. There is also a danger of complacency while the scheme is in place, and so the accompanying actions regarding reducing risk are urgent.</p>
Managed Retreat	
<p>52. Do you agree with the proposed principles and objectives for the Climate Adaptation Act?</p> <p>53. Are there any other principles or objectives you think</p>	<p>Legislative principles and objectives for managed retreat</p> <p>New objective proposed – resilience and risk reduction</p> <p>The existing objectives miss the opportunity to clarify the primary objective of this proposed legislation. Therefore, the Council proposes the addition of a new objective: <i>To build resilient communities and reduce risk to people and places.</i></p> <p>In line with this proposal, we encourage reconsideration of the framing of the principles as a whole to better articulate the outcomes sought for people, communities, and the environment.</p>

would be useful?	<p>Amended objective - threshold for managed retreat to be clarified <i>To set clear roles, responsibilities and processes for managed retreat from areas of intolerable risk.</i></p> <p>We support the inclusion of an objective that provides direction on when a retreat is desirable. To support this objective, we seek development of a national standard that establishes risk categories and thresholds, and a clear definition of “<i>intolerable risk</i>” to avoid subjective decision-making and to thereby ensure a more consistent and equitable approach to retreat across New Zealand.</p> <p>When considering risk tolerability and application of retreat thresholds, a multi-hazards approach should be adopted as there may be considerable non-climate related risks, such as earthquakes or volcanos, which should be part of decision making.</p> <p>However, reliance on “<i>intolerable risk</i>” alone may also compromise a more proactive approach to retreat and may impede the social and ecological benefits of a timely retreat. The assessment of ‘when retreat is desirable’ should also provide for the identification of areas where the benefit of pre-emptive, timely, retreat is likely to yield social and environmental benefits and efficiencies associated with implementation.</p> <p>For example, the social benefits of a timely retreat could include prevention of primary and secondary stressors such as dealing with repeated flooding, multiple insurance claims, managing repairs and rebuilds, and living in temporary accommodation. These stressors enormously impacted on people’s wellbeing in parts of Christchurch that were badly impacted by the earthquakes but which were not red-zoned ie no retreat option was available.¹</p> <p>The environmental benefits of a timely retreat could allow space for species reliant on the inter-tidal zone to also retreat as the seas rise. A reliance on “<i>intolerable risk</i>” only precludes the kinds of environmental outcomes encouraged through the NZCPS and may passively advantage those (engineered) options that only buy time and further imbed residual risk.</p> <p>Therefore, the Council proposes the addition of a new principle that captures the following concepts: <i>To provide guidance on what constitutes “intolerable risk” to ensure that managed retreats are equitably initiated across New Zealand; and to ensure communities have clear visibility of the criteria that the decision-makers are applying. Guidance should be cognisant of the ecological and social benefits of a proactive and timely managed retreat.</i></p> <p>New objective proposed – roles and responsibilities for legacy issues, learnings from the Canterbury Earthquake ‘red-zoning’ The Council would like to see upfront consideration of three specific legacy issues of a retreat which the Crown should be cognisant of and be prepared to proactively address; provision of services, management of stranded assets, and land amalgamation and remediation.</p> <p>Provision of services - Following the red-zoning of land in the aftermath of the Canterbury Earthquake Sequence, around 30 private property owners opted to decline the Crown offer and stay in the Ōtākaro Avon River Corridor. Under sections 130(2) and s124 of the Local Government Act 2002, the Council is required to provide ongoing water and wastewater services to these properties. Ongoing provision of wastewater services alone to some of these properties costs up to \$25,000 annually each (compared with \$220 for a typical urban property).</p> <p>In these circumstances, the Council should be enabled to reduce levels of service and/or retreat infrastructure provision where it is deemed unsustainable and uneconomical to continue. However, it is critical that this consequence of a managed retreat is known in advance so that private property owners can make informed decisions if they elect to (and are allowed to) stay in a retreat area.</p> <p>Furthermore, local government needs a tool to enable a sinking lid on the quality of infrastructure and service provision to deliver cost effective options while adaptation planning is underway or being applied, in order to avoid costly maladaptive outcomes.</p>
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¹¹ For more information see the [Canterbury Wellbeing Index](#) and the [Canterbury Wellbeing Survey](#).

	<p>Stranded assets, future use and land remediation – Stranded assets can include those with uncertain legal ownership, such as abandoned private protection structures, seawalls, landings and jetties that with sea level rise may move from land to being located within the Coastal Marine Area and which may contain hazardous materials. Examples of these are the large number of structures found along the estuary edge of the red-zoned land in Southshore, Christchurch. These were not removed by the Crown after properties were red zoned and have been left for the Council to deal with.</p> <p>However, the current statutory framework is unclear and does not provide certainty as to which statutory agency (local government, regional government or DOC) has the power and/or responsibility to remove these structures. Dealing with these has proven to be very difficult and costly.</p> <p>Other stranded assets are owned, for example by utility companies who then seek compensation from local government for their losses; a cost that local government is not equipped to fund. Again, in post-earthquake Christchurch the Crown took no steps to remove utilities from the red zoned land or to remove the utility owners legal rights to retain their utilities on the land. These assets can become liabilities both financially and environmentally to local government who is then required to negotiate their removal with the utility companies involved. In addition, local government should be protected against future loss-in-profit claims associated with changing land use.</p> <p>In addition, the removal of roads can be problematic as the process to formally stop roads under existing statutory processes is focused on the need for the road for access rather than on other factors such as managed retreat. Current processes provide for public consultation and appeal rights to the Environment Court, with the result that it may not be legally possible to formally stop a road if it is still required for access. Even if a road can be legally stopped, the physical removal of roads is a lengthy and costly process that requires management and disposal of hazardous substances such as coal tar.</p> <p>The approach to the management of stranded assets is dependent on the future uses of the land. In many cases, it may be desirable or necessary to remove these assets in order to remediate the land, but in other cases assets may remain in situ. We note that the Crown did not remove horizontal infrastructure in the red-zoning process due to the costs and complexities of doing so, and we expect that local government is not then expected to do so with fewer resources and funds available.</p> <p>Land amalgamation - Lastly, the process of reconfiguring and amalgamating individual land titles in the retreat area can be very difficult, costly and lengthy and can significantly delay land remediation and the transition to future uses of the land, particularly if a managed retreat is staged over many years. In Christchurch, the Crown offer to red zone residents closed in 2012 and the process of the amalgamation of land titles being undertaken by LINZ remains far from conclusion a decade later.</p> <p>Local government is not funded, and does not employ the specialist staff required, to undertake such land reconfiguration and amalgamation work. In the Christchurch red zone example this work is being undertaken by the specialist survey, property and legal staff of LINZ at a very significant cost.</p> <p>A clear legal pathway to address these issues is integral to managed retreat legislation that is fit for purpose.</p> <p>Therefore, the Council proposes an additional objective that captures the following concepts: <i>‘To clarify post-retreat roles and responsibilities relating to provision of services to private property owners who opt to remain in a retreat area’, management of stranded assets, land management and land remediation.</i></p> <p>Scale</p> <p>The Council notes that the principles and objectives are silent on the implications of scale. A retreat of less than 100 homes such as in Matatā is a significantly different proposition to the red zoning and retreat of almost 8,000 properties that occurred in Ōtautahi Christchurch. Some local authorities might deal with only one retreat area, others might be dealing with multiple retreat areas. The resources, capacity and capability of local government is varied and therefore,</p>
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	<p>the Council recommends that scale is implicitly considered within the objective “to provide clear criteria for when central government will intervene (or not) in a managed retreat process”.</p> <p>Partnership principle <i>“Iwi/Māori are represented in governance and management and have direct input, and influence in managed retreat processes, and outcomes for Iwi/Māori are supported.”</i></p> <p>The Council was concerned to note that the role of Iwi/Māori in governance and management was limited to ‘representation, direct input and influence’, as this does not appear to reflect the principles of Te Tiriti, which would support an acknowledgement of ‘partnership’ status within this principle.</p> <p>The Council’s coastal hazards adaptation planning process is founded on the acknowledgement of the intrinsic values of the whenua, wai and the environment held by Te Rūnanga o Ngāi Tahu and Papatipu Rūnanga. Therefore, our guiding principles include: <i>“We will uphold the principles of the Treaty, including the principles of partnership and the active protection of Ngāi Tahu interests in land and water. This commitment includes recognising rangatiratanga and the duty to actively engage with mana whenua”</i>. We would support a similar strengthening of the principle in the NAP.</p> <p>Funding and financing adaptation principles and objectives</p> <p>Crown limiting its exposure, increases the exposure of others The Council supports the principle <i>“risks and responsibilities are appropriately shared across parties including property owners, local government, central government and banking and insurance sectors”</i>. However, this does not align with the principle to: <i>“limit Crown’s fiscal exposure”</i> and the objective <i>“to reduce liabilities, including contingent liability to the Crown”</i>.</p> <p>The Council considers that these principles are unacceptably silent on ensuring certainty and limiting local government’s fiscal exposure to this potential liability. Moral hazard must be considered and the Council would therefore encourage a more overtly partnership-orientated approach. Where the Crown limits its exposure others are expected to pay more, and there are clear inequities and inefficiencies in using a rates base to fund adaptation, when a tax base is spread across the country. The proper approach would be to limit all parties’ fiscal exposure by creating a framework for the most cost-effective adaptation decisions, and then, where exposure remains, share this appropriately across parties.</p> <p>Therefore, the Council proposes that wording of these principles is amended as follows:</p> <ul style="list-style-type: none"> • Fiscal exposure is shared across all affected parties. • To reduce liabilities, including contingent liability to the Crown and local government. <p>Simplicity vs Fairness The Council considers that the principles <i>“solutions are designed to be as simple as possible”</i> and <i>“beneficiaries of risk mitigation should contribute to costs”</i> have the potential to drive contradictory outcomes.</p> <p>Identifying who benefits and by how much can create complexities. As an example, while some coastal residents are directly affected by sea level rise, most residents from across the district utilise and enjoy our coastlines and rivers. The roads and other infrastructure in these areas may also service wider non-coastal communities. Calculating a fair contribution based on their benefits is challenging.</p>
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	<p>The Council also notes, that as we transition towards a new climate future, some communities will experience greater impacts and earlier challenges, but all of us have been responsible for the climate crisis that we are experiencing, and we will all benefit from adaptation and risk reduction through reduced costs to the wider economy.</p> <p>Transitional provisions</p> <p>Local government is already undertaking adaptation planning with communities exposed to climate impacts. Consideration must be given to how transitional provisions will work given exposure is potentially already in effect. The Climate Adaptation Act must also seek to ensure consistency with existing work undertaken by local government in this area, or at least incorporate learnings from consultation received as part of local projects.</p>
54. Do you agree with the process outlined and what would be required to make it most effective?	<p>Learn from Christchurch's experiences</p> <p>Christchurch experienced New Zealand's most significant retreat through the Crown's red zoning process. Each component of a retreat process (with the exception of advance planning and preparation) was tested and hard lessons were learned. Impacted residents and agency practitioners faced some of the greatest challenges of their lives working through such a novel process at a time when the city was continually still experiencing aftershocks.</p> <p>The Council notes the limited references to the Christchurch experience in the document; and is surprised that no attempt has yet been made to engage directly with those who were involved in leading the process, as well as those who experienced the process.</p> <p>In respect of these difficult experiences, the Council respectfully seeks the opportunity to help inform the development of the managed retreat legislation with a particular focus on ensuring we learn from the past. We welcome the opportunity to engage in detail and look forward to hearing from MfE.</p> <p>The Council has the following comments on the draft process:</p> <p>Community needs to be in the centre</p> <p>The Council is surprised to see a managed retreat process that does not have community in the centre. Ultimately none of these actions are needed if people do not understand the rationale for change, are not fully engaged in the processes, do not feel empowered or heard, and are not able to accept the outcome of a managed retreat.</p> <p>Local government is likely best placed to lead this process due to our close connections with our communities; but if the process doesn't overtly recognise and foster a co-creation approach with communities, local government will fail to deliver timely, effective, or fair outcomes.</p> <p>Initiation</p> <p>The draft process signals the use of multiple initiation pathways. Is there a hierarchy? Some pathways are more bottom up and others more top down. Who decides which pathway to use? If this decision is left to local government it will be highly complex, national direction is needed. How do the SPA and NBEA operate to support retreat? How do local governments who are already working with communities avoid crossover and duplication through multiple pathways?</p> <p>Many local governments are currently undertaking adaptation planning processes based broadly on the <i>2017 MfE Coastal Hazards and Climate Change guidance for local government</i>, which recommends a highly collaborative co-creation process. In Christchurch, we are working in partnership with rūnanga and communities through the establishment of Coastal Panels who will recommend adaptive pathways for decisions. We consider this collaborative approach essential in some communities where earthquake legacy issues have led to reduced trust and confidence in agencies. This 'bottom up' process has the benefit of increasing community buy-in for the outcome, but it is a complex, resource-intensive and slow process.</p>

	<p>Conversely, existing RMA processes are seen as ‘top down’ by communities. The Council has little visibility of the details of the proposed Regional Spatial Strategy or NBA Plan processes, but raises a risk that these will also be viewed as ‘top down’ processes.</p> <p>If communities feel ‘done to’ rather than ‘done with’, managed retreats will not be accepted by communities. A survey of those red-zoned property owners who accepted the Crown offer in Christchurch found that 82 percent considered that having an offer was better than not having an offer². However, the fallout of this ‘top down’ process was a legacy of distrust in agencies (only 38 percent stated that they had trust in agencies), and a range of other wellbeing impacts that should be front of mind for Crown in drafting the Climate Adaptation Act.</p> <p>We are seeking urgent clarification about the future of the non-statutory approach currently recommended by MfE which local government is currently using. The Council has concerns about the longevity and mandate of the MfE process. What status will adaptation plans have in the future? Is it realistic to expect that decisions made by communities (and local governments) today, based on current values, will have weight in the future as communities evolve. Is it realistic to expect local governments to continually revisit and update these over time? What impact might this have on communities who are living with this uncertainty?</p> <p>The Council would like to see urgent updating the <i>2017 MfE Coastal Hazards and Climate Change guidance for local government</i>, in collaboration with practitioners and in alignment with the development of the new proposed pathways set out above. Without visibility of the scale and timing of policy revisions local government is awkwardly positioned when communicating adaptation science and delivering related processes.</p> <p>Planning and preparation</p> <p>It is extremely unrealistic to expect that this is a single step. This assumption indicates that design of the process requires greater involvement of practitioners with implementation expertise.</p> <p>In reality, implementation of a full retreat process will require continual planning and preparation as each small step in the process requires myriad actions and coordination of expertise from multiple disciplines. In addition, our understanding of risk is constantly evolving and must constantly be responded to.</p> <p>Local government may not currently have sufficient programme management expertise to provide oversight to these kinds of processes and smaller councils are often reliant on technical experts or consultants to lead this work in addition to their core roles and at significant cost. As described above, leveraging the work of Crown Research Institutes may be one way to deliver equitable outcomes across local governments.</p> <p>Preparation involves considerable expenditure on technical and other expert advice that is not typically embedded within local government. Millions of dollars will have been spent by local government across New Zealand on consultants who produce similar information multiple times. Stronger leadership is needed by MfE to deliver tools that are fit for purpose for practitioners. As a first step, the Council encourages MfE to establish a close working relationship with the Aotearoa Climate Adaptation Network to ensure they truly understand the barriers and needs of practitioners. After this, clear, thorough and consistent guidance on how to undertake the best hazard and risk assessments should be provided.</p> <p>Provisions in the NBA plan restricting activities before a managed retreat plan is implemented, should also consider provisions for the removal of development and restoration or remediation once a trigger point is reached.</p>
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² <https://quakestudies.canterbury.ac.nz/store/object/524619>

	<p>Enabling investment, active retreat and clean-up</p> <p>A glaring omission in this draft process is any reference to funding. Who is paying for retreat? Who is paying for investment?</p> <p>There should not be an assumption that local government can cover the costs involved in all components of retreat. The Council is required to engage with communities on any rates increases through the LTP and Annual Plan cycles. It is naïve to expect that ratepayers will submit in support of costly, geographically specific, and at times nebulous costs associated with managed retreat.</p> <p>The Council has the following questions and comments about the draft process:</p> <ul style="list-style-type: none"> • Does it allow for lowering of levels of service / ending service provision for those who elect to stay – and does it also allow for lowering of levels of service in the period before a retreat is required? • Does it address the issues of managing remaining structures or abandoned structures and land amalgamation outlined in our response to Q52/53 • Will guidance be provided on the removal of assets; horizontal infrastructure and also HAIL/landfill? Who pays for removal?
55. What do you think should trigger the process?	<p>It will be critical that the eventual decision-maker has guidance on which to rely when determining whether a retreat strategy is appropriate. This will support community understanding and reduce the potential for a contested outcome and/or geographical inequities in approach.</p> <p>As noted in our response to Q52&53, considerations should include identification of risk tolerance categories and appropriate signals and triggers that indicate action is needed in time for retreat to be effective. Criteria could extend to the full range of hazards present on the land. However, reliance on “intolerable risk” alone may compromise a more proactive approach to retreat and may impede the ecological and social benefits of a timely retreat.</p> <p>In some cases, retreat may be triggered by a significant event in an area where adaptation planning has not yet begun. It would be naïve to assume that local government has the capacity to plan in advance for the possible retreat of all communities and therefore guidance should also address unplanned retreats triggered by significant events.</p> <p>Communities are aware of the criticality of monitoring of change to ensure the evidence base is there to inform these types of decisions. There is a need for a monitoring framework that allows for the collection and reporting of data that can be collected nationally but should be published at a very localised level i.e. insurance retreat data as well as data that can be collected by communities at a very localised scale.</p>
57. What roles and responsibilities do you think central government, local government, iwi/Māori, affected communities, individuals, businesses and the wider public should have: A. in a managed retreat	<p>Local government as the decision-maker?</p> <p>Local government is well positioned to work with communities and mana whenua to undertake adaptation planning, as we understand local communities and local environments. However, local government needs to be enabled to lead this work and that requires the following conditions to be in place:</p> <ul style="list-style-type: none"> • An unequivocal mandate/imperative for local government to act to ensure that carefully planned processes do not become political footballs. Governance considerations through the local government, RMA and three water reform processes should actively reinforce this. • Funding and resourcing support from central government in acknowledgement of the significance of this new responsibility for local government. • Enabling legislation and guidance, tools and policies that have been designed in tandem with local government to ensure they are fit for purpose. • Local government funding responsibilities should be confined to Council-managed public infrastructure. • Ongoing collaboration across layers of government, and other parties to ensure rapid escalation and responsiveness of policy to emerging issues. • Practical support especially for smaller councils e.g. secondments, ‘flying squads’, centrally supported sharing of practice, tools and guidance.

<p>process</p> <p>B. sharing the costs of managed retreat</p>	<p>Central Government</p> <p>Central government needs to commit to an ongoing involvement in this work; broadening out from a strategic advisory role, to take a greater role in implementation support. The role of central government should include:</p> <ul style="list-style-type: none"> • Proportionate funding responsibilities; with a particular focus on compensation for private property owners. • Leadership of the interface with insurers and the banking sector including the initiation of any insurance scheme. • Clear direction to water entities and utility providers that they must prioritise collaboration with local government on adaptation planning and acknowledgement that the outcomes of managed retreat decisions will require funding the retreat and rebuilding of infrastructure. • Front footing the narrative with communities; by clearly communicating the latest climate science and challenging mis and disinformation.
<p>58. What support may be needed to help iwi/Māori, affected communities, individuals, businesses and the wider public participate in a managed retreat process?</p>	<p>Canterbury earthquakes – psychosocial support</p> <p>Many lessons from the Canterbury Earthquake response and recovery are pertinent and we encourage further dialogue on these. Further information on each of these suggestions is available at the EQ Recovery Learning site.</p> <p>A psychosocial wellbeing framework based on the IASC (2007) Psychosocial Pyramid should be in place to guide those leading managed retreat processes. This should emphasise and enable community-led wellbeing approaches in recognition that communities know best what they need to support themselves. Community grants can help ensure that community-led activities can be delivered. It is critical to support community leaders who may be the primary interface between communities and agencies. These leaders are usually unpaid and are at risk of burnout as they become the intermediary between agencies and communities.</p> <p>In addition, more specialised support from services established by central government should be available for those who need them. Examples include navigation services that help people who need additional support to work through complex systems such as applying for grants, dealing with insurers, moving into temporary accommodation, and connection into with mental health and wellbeing services where this is needed. The Earthquake Support Coordination Service is an example of this approach. A mana whenua-led navigation service should be established within or alongside this approach.</p> <p>Managed Retreat Tribunal</p> <p>Another critical form of specialised support is the early establishment of a claims resolution service. Again, this is a learning from the Canterbury Earthquake Sequence in which the Residential Advisory Service was established to alleviate pressure on the courts and provide faster resolution for people in communities. A similar model emerged from the Weathertight Homes experience.</p> <p>Regardless of how robust any managed retreat compensation system is, there will always be complex cases where individuals need the support to bring a claim because the process has produced an unjust result for them. While the courts are technically set up to be the forum for such claims, it is likely that due the volume of claims, support required for potential plaintiffs, specialist knowledge required for the management and adjudication of such claims, we will need a specialist ‘Managed Retreat Tribunal’.</p> <p>In the case of the earthquakes or the leaky home crisis, the resolution services and tribunals established by the Canterbury Earthquakes Insurance Tribunal Act 2019 and the Weathertight Homes Resolution Services Act 2006 came far too late and only after many years of dispute, costs and anguish for the claimants and defendants. We should use these experiences to anticipate the likely need for these services in the managed retreat scheme.</p> <p>We recommend that the legislation include a section to establish this service. These services will provide speedy resolution for potential claims, rather than decades of litigation for those with complex claims. Support services for those who cannot afford private representation to bring a claim will also help resolve equity issues.</p>

59. Managed retreat will have many costs, who do you think should be responsible / contribute to these?	<p>Costs should be shared appropriately across all parties and to support discussion on this we would like to see some proposals from MfE that break down the components of the process and propose a range of scenarios for cost-sharing that we can respond to. This could form the basis of a subsequent engagement with communities and agencies.</p> <p>The Council notes that any cost-sharing schemes need to be carefully designed to avoid unintentionally incentivising parties to 'put off' adaptation planning until a specific date or trigger. A 'sinking lid' model may address some parts of this issue. The Council also believes that instead of promoting a national cost-sharing approach alone, innovative ways of funding climate change action should be explored.</p> <p>The Council's response to Q52&53 raised some legislative gaps (land amalgamation, dealing with stranded assets and dealing with land remediation) and these also create significant costs that require a funding source. An additional cost is that of providing security to ensure that vacant properties and neighbourhoods do not become targets of crime during the period between a retreat and demolition. Provision of reassurance to remaining residents is critical and should be a consideration when determining the retreat strategy (ie the degree to which retreat should be staged).</p> <p>We note that the whole proposal seems to be framed with retreat through buy-outs in mind. The proposal should be open to other retreat approaches such as land swaps, leasebacks, future interests and transferrable development rights. Council has developed a summary of the range of different approaches to adaptation including consideration of these other retreat options in our Catalogue of Coastal Hazard Adaptation Options.</p>
66. Under what circumstances do you think it would be fair or necessary for government to take approaches with a greater or lesser degree of intervention or support?	<p>Questions 60&66 reference central government "involvement" and "intervention" without providing definition of what shape this might take.</p> <p>However, p.15 of the <i>Kia urutau, Kia Ora: Kia āhuarangi rite a Aotearoa, Adapt and thrive: Building a climate-resilient New Zealand</i> document implies that central government might take responsibility for retreat off local government.</p> <p>While the specified conditions might support this where local government has capacity issues, the lessons from the Canterbury Earthquake experience suggest that this should be carefully considered to ensure that local communities do not feel disempowered and excluded from decision-making.</p>
61. Should commercial properties/areas and residential properties/areas be treated differently in the managed retreat process?	<p>It is not clear whether this question refers to planning processes or compensation regimes.</p> <p>The Council notes that some commercial businesses are located within residential areas and provide services and bolster the wellbeing of those communities i.e. pre-schools, fish and chip shops, petrol stations. In some cases, people will have a combined residential and commercial property ie corner dairies. It should not be assumed that small businesses are better equipped to deal with retreat issues than residential property owners.</p> <p>Therefore, it may be simpler and fairer to ensure that the whole community has the same rules/guidelines. The Council notes that following the Canterbury Earthquakes commercial property was not eligible for compensation and that created some challenges with uneven insurance cover meaning some commercial properties were unable to transition into new locations.</p>
62. Are there circumstances in which people shouldn't be able to	<p>Central government should provide direction on whether people are required to leave a retreat area, or whether people can elect to stay.</p> <p>As per our response to Q52&53, if people can elect to remain, the Council should be enabled to reduce levels of service and/or retreat infrastructure provision where it is deemed unsustainable and uneconomical to continue.</p>

stay in an area after community services are withdrawn?	<p>However, it is critical that this consequence of a managed retreat is known in advance so that private property owners can make informed decisions if they elect to stay in a retreat area. If they do so, they must be responsible for their own service provision in compliance with environmental standards.</p> <p>Other considerations include:</p> <ul style="list-style-type: none"> • risk to life • whether the future use of the land, for example for ecological restoration or provision of new infrastructure allows for residential properties to remain • In some cases, retreat may need to incorporate provision for some retention of access to/through or service of corridors to these areas
64. Do you think there are reasons for different groups to have different levels of involvement in a retreat process?	The Council is involving all members of affected communities in our adaptation planning process in recognition that people invest in community in different ways. Home ownership is not the sole determinant of community membership.
67. How do you think land with historical, cultural, social or religious significance should be treated?	On a case-by-case basis depending on local values and local needs.
71. How do you think post-event insurance payments could support managed retreat?	<p>Insurance payments could be used to support global solutions to risk management including property swaps out of areas subject to high natural hazard, such as floodplains, and this would give rivers more room to move, increasing resilience of whole community. There needs to be a shift away from individual claims being individually settled and rebuilding back into high risk areas.</p> <p>As mentioned above, learnings should be taken from the Canterbury Earthquake response.</p>
72. Should insurability be a factor in considering managed retreat from an area?	Insurance retreat is likely to be a signal that managed retreat may be a necessary step. Conversely, insurability does not signal that managed retreat may not be necessary at some point, because policies are renewed annually and therefore they provide little long-term certainty. As per Q46, community risk tolerance may be less than the insurability threshold so that adaptation triggers may be met before the insurance retreat occurs.