



**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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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.

