

3 June 2022

Ministry for the Environment
Email: adaptation@mfe.govt.nz

SUBMISSION ON DRAFT NATIONAL ADAPTATION PLAN AND MANAGED RETREAT

Kāpiti Coast District Council (Council) appreciates the opportunity to submit on both sets of consultation questions for the *Draft National Adaptation Plan (NAP)* and *Managed Retreat*.

Our Council is well-known for its long history of climate change action. While the Kāpiti Coast District made national and international headlines in 2012 for our efforts to establish District Plan rules in line with the New Zealand Coastal Policy Statement, Council has actually been working with the community to develop evidence-based coastal adaptation plans since the 1970s.

Our submission draws on the lessons we have learnt to (i) provide examples of the challenges local governments encounter when developing and implementing plans for climate change adaptation and (ii) suggest additional actions central government can take to support local government.

The most significant points of our submission are:

- *Focus area one: reforming institutions to be fit for a changing climate* is the most important focus area because, of the three proposed, it will have the widest impact across local government. Both central and local government require the necessary powers and tools to enable a sufficient and timely response to climate change.
- In addition, actions that could result in transformational change to the economic and financial systems are critically important. Our economic and financial systems can create powerful incentives for adaptation, and opportunities for new funding models.
- Council agrees that the risks and costs of adaptation must be shared, but on the other hand Council is concerned that the draft NAP overestimates the ability of some stakeholders to pay while downplaying the role for central government. For local authorities and their communities, the costs associated with adaptation exceed their means, which means that adaptation will not ever happen at the speed required unless new funding solutions are developed. In addition, these funding challenges and concerns over impacts on property values cause significant fear for residents, inhibiting their ability to meaningfully engage on these matters as the conversation becomes dominated by these financial considerations.
- Council would like to see further action on risks G3 and G5 of the National Climate Change Risk Assessment (NCCRA) as these are crucial for local governments:
 - G3 – Risks to governments and business from climate change related litigation, due to inadequate or mistimed climate change adaptation.
 - G5 – Risks of delayed adaptation and maladaptation due to knowledge gaps resulting from underinvestment in climate adaptation research and capacity building.

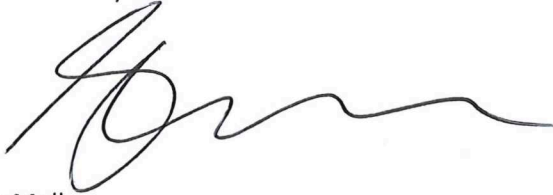
- Note, however, that our Council does not entirely agree with the causal factors identified in risk G5 of the NCCRA. While risks of delayed adaptation and maladaptation are a significant issue, in our Council's experience, delayed adaptation and maladaptation are not due to underinvestment in climate adaptation research and capacity building. Instances of delayed adaptation and maladaptation are primarily due to difficulties in reaching consensus on preferred long-term adaptation plans, land use rules, and who pays. This has, unfortunately, often resulted in decisions being made in Courts of Law rather than in partnership with community, tāngata whenua, academics and technical experts. This also inhibits consistency of practice.
- Council contends that central government's primary role in climate change adaptation on a local scale is facilitating and supporting (through tools, information, resourcing, and funding) local government, mana whenua, and communities to make the right decisions for reducing climate change risk and building resilience. As such, Council would like to see greater resourcing to enable mana whenua to co-govern and/or realise iwi and hapū adaptation priorities.
- It is also important to note that there is a significant amount of information held by local government, mana whenua, and specialist experts that does not appear to be acknowledged in the draft NAP. In many instances, central government appears to be behind the 'rest of us' and will slow our progress down while it gets up to speed. It is critical that central government utilises the extensive knowledge base that already exists. This is discussed further in our responses, primarily to the questions posed in the infrastructure section and the questions about managed retreat.
- Guidance for local government should not be developed by a team that does not fully understand the local government experience. Local government involvement is critical because practitioners who have been at the coal face of local adaptation discussions are needed to develop practical guidance and advice. As a key delivery arm for infrastructure, land use planning, and regulatory services, local government experts can make significant contributions to the suite of working groups that will be developed to implement the NAP. While pleas for local government involvement have been made time and time again, this is absolutely crucial for climate change adaptation.
- In addition, central government must give more consideration to local government processes and, when establishing timeframes for involvement, be sensitive to local government constraints. A case in point is the timeframe on this call for submissions. It is too short for local government's governance processes (particularly if a draft submission is to be presented to Elected Members for their feedback) and comes at an incredibly difficult time of year as local governments are also working to meet their financial year-end reporting requirements.

Council welcomes this National Adaptation Plan. Even if the world manages to limit global warming to 1.5°C, long-term climate change impacts are inevitable and Aotearoa New Zealand must be prepared.

Climate change mitigation continues to be critically important too, as this will impact the rate and severity of change. In the Kāpiti Coast District, 57% of greenhouse gas emissions are from light transport. As a transition to low-carbon transport is required to reduce our District's transport emissions, Council was extremely disappointed to note that Budget 2022 failed to invest in extending the Wellington metropolitan commuter rail network north of Waikanae.

Council supports the submissions made by the Aotearoa Climate Adaptation Network and the other Wellington region councils. Council understands that hearings are not planned for this consultation process but would be pleased to speak to our submission if there is any opportunity to do so.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sean Mallon', written in a cursive style.

Sean Mallon
ACTING CHIEF EXECUTIVE