



This submission has been submitted on behalf of CCRU.

CCRU is a Coastal Community based group in Christchurch. A group which counts Architects, Coastal Science and Climate change Specialists, Mathematicians, Social scientists and Residents with vast local knowledge amongst their numbers. We have a support network to call upon from other disciplines such as RMA specialists and Coastal Engineers. CCRU also interacts with resident groups, local authorities and government entities regarding coastal issues. Most recently CCRU were instrumental in facilitating the repair of a disconnect in the CHC district plan through section 71 of the regenerate Act

This submission is specifically regarding Question 8. We have read your Draft comments with interest and in general we support many of your comments.

Q8

How are local authorities factoring in response and adaptation to climate change and other natural hazards (such as earthquakes) to their infrastructure and financial strategies? What are the cost and funding implications of these requirements?

- We agree that there is a mismatch between the resources and capabilities available to local authorities and the scale of their adaptation challenges. There is weighted focus on post event responses and too little on pre-event action or pre-adaption. This is also compounded in areas where there has been damage from other hazards such as earthquakes or rock fall. Local authorities are seemingly unable to distinguish between spending required for immediate need and the upfront cost of long-term planning for the slower onset of climate change. Stalling any repair process at all.
- We agree that the central government approach to providing financial assistance to communities affected by natural disasters tends to be ad hoc and inconsistent. This has resulted in vast inequity and has certainly been the Christchurch experience post-earthquakes. There have been some big winners financially and many that have sadly lost thousands. With housing being the largest financial asset of many new Zealanders, this inequity is primed to be repeated in the management of climate change response.
- Your statement – “No consistent and centrally managed mechanism for funding the costs of managed retreat exists”. - While we agree with this statement specifically in regard to funding, we are concerned that managed retreat is being seen as the primary go to funding point. We view that funding needs to take a flexible approach that allows funding to respond in a manner that is most appropriate for a community or an areas circumstances

In our view there is not enough consistent information on what is exactly meant by “managed retreat”. The words are thrown around as more of a threat without any substance or plan. Managed retreat for hazards that have already occurred and are continuing to occur – retreat for hazards that are based on hard empirical data will need to be managed differently than those based on non-local modelling, are proposed and have yet to show evidence. Lumping Climate change and other hazards together for this reason will be problematic. We consider managed retreat to be the last funding option available when all other options have been explored and exhausted. The exceptional circumstances would be advancement of said hazard that was too fast to mitigate (cliff collapsing for example). People are in immediate danger.

- We also agree as a result; local authorities are attempting to develop their own approaches and that these will generate inconsistencies and inequities across New Zealand. No mechanisms are in place to ensure the costs of climate change adaptation are shared equitably across the existing population, and intergenerationally.



This will occur not just between cities but within communities and between suburbs. We have seen evidence of this in Christchurch where some suburbs have been funded for mitigation and other have not. This Cherry picking of response within a city has seen development stifled and community wellness significantly decline in those communities awaiting or not viewed as “worthy” of a pre-adaptation response. Additionally, the focus has been on residential coastal areas only and this has served other areas in the city to believe they do not need to respond or are not affected. Central Cities like Auckland Wellington and Christchurch have significant exposure and therefore cities should be concentrating on funding a city-wide response plan with the view that different areas would require different adaptation methods and timelines. The lack of a city-wide funding context will contribute to isolation and segregation of certain areas. This will no doubt also contribute to the lack city wide support for spending streams in particular areas.

In addition, CCRU add the following

There appears to be little differentiation between urgent action required, existing communities and development of a new area. While new development can largely be funded and managed through planning, mitigation set backs etc. Existing communities if not in imminent danger have an intrinsic value that is not being recognised or calculated. In some established communities where little immediate or historic danger is evident, given the timeline onset of SLR is slow but undetermined- mitigation and monitoring could be money well spent- and the favourable option. There seems a stigma attached to mitigation as it has an upfront cost and is seen as being short term. The question needs to be asked what is short term? These up-front costs need to be amortized out over the life time of the project and significant value should be attributed to the role of public funding designed to minimise risk and enhance societal resilience.

It appears the “go to choice” of response by local authorities is to use Planning rules. It is low cost and the financial burden is borne by others. Restrictive planning rules cause a financial, emotional and social cost to the community. It introduces fear that managed retreat is a councils’ objective (‘managed retreat by stealth’ is what the community believe the council wants).

Local Bodies are often not effectively conducting balanced Section 32 assessments required under the RMA where they are to “identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for growth”. It appears the equal weight of importance is not being given to the social and cultural costs of policy implementation when weighed against environmental and economic values. People are viewed as statistics or numbers.

It is questionable wither current environmental planners have the capacity or are the most appropriate to be the primary information providers or decision makers in an issue as large as mitigation, managed retreat and its funding. That is no disrespect to them and their field, but this is a very different and difficult issue and requires the input of multiple disciplines to successfully evaluate. These issuers require a series of experts but most importantly it needs to involve the communities that are potentially affected, from the beginning.

Communities should be engaged. The mental health costs of those communities need to be considered given that this is a long-term issue. There will also be an element of inequity for those who may be within hazard zones. Many are poorer communities with little voice over issues that allow them to be stampeded by authorities.



Finally, while flexible and successful funding models will be the hub of the wheel that drives our climate change response, there are many other spokes that will need to evolve to support “no regrets expenditure” and make the wheel turn. Consistency within and between higher level documents such as the RMA, building codes. MFE and Coastal policy statements need to occur. Better monitoring and more appropriate risk assessment by authorities, modern and flexible response by insurers that supports adaption and mitigation of properties and a move away from planning as the sole response vehicle are certain areas in need of attention for best practice outcomes.

CCRU would also like to point out that as a group we are working towards a pre-adaption response for an affected Coastal area. Two of our expertly qualified members have just returned from overseas where they have been researching and discussing available forms and models of adaption funding. This will form a body of research they will present later this year. It may be worthwhile connecting with us on this issue in the near future.