

National Adaptation Plan Consultation
Ministry for the Environment
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Kia ora koutou

SUBMISSION ON THE DRAFT NATIONAL ADAPTATION PLAN

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the draft National Adaptation Plan (the NAP).
2. The DCC supports initiatives to minimise the harm from climate change and future proof the environment.
3. The DCC notes the proposed actions for managed retreat as part of the reform of the Resource Management Act.
4. The DCC understands from the discussion at the Local Government workshop for the draft NAP on Tuesday 10 May 2022, that this is the first consultation on the NAP, and that there will be another opportunity to make a submission specifically on development of the managed retreat framework later in 2022. The managed retreat framework will be legislated as part of the Climate Adaptation Act that the government is expecting to introduce by the end of 2023 (p28 of [Draft-national-adaptation-plan.pdf \(environment.govt.nz\)](#)).
5. The submission on the draft NAP is due 3 June 2022.

How will the National Adaptation Plan work?

6. The DCC would like further clarification as to how the NAP will be prioritised at a local level, in the context of the differing environments and environmental challenges across Aotearoa New Zealand.
7. The DCC appreciates the support and partnership of the Otago Regional Council (ORC) on matters of shared responsibility and interest. The DCC would welcome further clarification of how actions in the NAP will be identified and managed at a local level, and how central government will work together with local government organisations to achieve the planned outcomes. We need better clarity of roles and responsibilities of district and city councils, regional councils, and central government in relation to natural hazards and climate change adaptation, across all legislation.
8. The DCC supports a centrally led and coordinated data and information portal, providing easy, rapid and comprehensive access to data, information, evidence and guidance to support councils in their climate change adaptation planning.

9. At the Local Government workshop for the draft NAP on 10 May 2022, there was discussion amongst attendees about how “intolerable risk” was being defined in the context of the NAP. The DCC supports clarification on this, and welcomes further information about the overall risk management approach within the NAP and how this will be used.
10. The DCC welcomes more detail around how cultural heritage perspective will be included in regard to the “Houses, Buildings and Places” section of the NAP, which was an issue noted at the Local Government workshop.
11. The DCC supports concerns raised by other attendees at the Local Government workshop about short-term or interim actions to minimise climate change which are not addressed in the NAP.
12. The DCC would appreciate greater urgency in the delivery of the actions included in the NAP.

Dunedin’s Strategic Approach to Climate Change Response

13. The DCC has been progressing work on climate change mitigation and adaptation since 2009. Having a high degree of exposure to sea level rise, Dunedin is particularly aware of the consequences of inaction on climate change adaptation.
14. In June 2019, the DCC declared a climate emergency, and brought forward the DCC’s city-wide net carbon neutrality target by 20 years, adopting a two-part emissions reduction target (‘Zero Carbon 2030’) as follows:
 - a. net zero emissions of all greenhouse gases other than biogenic methane by 2030; and
 - b. 24% to 47% reduction below 2017 biogenic methane emissions by 2050, including 10% reduction below 2017 biogenic methane emissions by 2030.
15. Te Ao Tūroa – The Natural World, Dunedin’s Environment Strategy 2016-2026 envisages a partnership approach to delivering on the city’s climate change adaptation and mitigation ambitions.

South Dunedin

16. Dunedin is home to a particularly challenging area of national significance for climate change adaptation. South Dunedin, along with other low-lying areas of the city such as Harbourside, is exposed to a range of natural hazards. Climate change is expected to increase the intensity, frequency, impact and consequently the risk presented by many of these hazards.
17. The flat area of South Dunedin is likely to be the area of Dunedin City most affected by climate change.
18. South Dunedin supports a diverse community of around 12,000 residents with strong connections to place. Local identity, social and economic indicators and levels of resilience, are all highly varied. The complex and interconnected nature of these issues requires an equally integrated response.
19. The DCC is concerned that climate change could exacerbate existing inequalities in Dunedin, noting that much of Dunedin’s most affordable and accessible housing is currently located in South Dunedin. Historically, the location was an important manufacturing and service area

for Dunedin. It remains important for light industry and has also evolved into a destination retail area.

20. South Dunedin is central, flat, conveniently located and home to many businesses, schools, and popular amenities such as the St Clair and St Kilda beaches. South Dunedin, and other low-lying areas such as Harbourside, host a range of essential infrastructure and DCC assets, which support services for wider Dunedin. There is great opportunity to realise a fully collaborative partnership approach by embracing transformational change in South Dunedin.
21. The DCC would welcome central government playing an active role in partnering with local government to address these local risks, noting that local government currently has significant resourcing pressures in responding to climate challenges, as well as a lack of clear legislative pathway to navigate these issues with the local community.
22. The DCC and ORC have been jointly funding a strategic programme to understand and respond to the climate change adaptation challenge in South Dunedin, taking progressive steps to jointly fund staffing and programme inputs. The DCC has invested significant resource into community-centred engagement to discuss climate challenges for Dunedin, including a targeted engagement in relation to the St Clair-St Kilda coastal area (culminating in a recent plan discussing challenges, views and potential approaches) as well as a broad major engagement with stakeholders in the wider South Dunedin urban area (over the past two years of direct approaches, involving over 60 community meetings and approximately 2,000 individuals).
23. The DCC acknowledges that this work will require an agreed strategy, effective collaboration within and across Council organisations, and meaningful partnerships with mana whenua, the South Dunedin community and other stakeholders. We recognise that there is an opportunity to identify a shared vision of the future for South Dunedin, and to develop a range of potential pathways to achieve this vision.
24. There are many current uncertainties, however the approach the DCC is taking in partnership with the ORC is attempting to support decision-making based on the Dynamic Adaptive Planning Pathways approach, as referenced in the draft NAP. Clarification, at a legislative and regulatory level, about the roles and responsibilities of key stakeholders, including asset owners, insurers, banks, private sector, local and central government, would greatly support these processes.
25. The DCC acknowledges the organisations and groups that have engaged and are engaging in understanding the South Dunedin landscape, including GNS Science, Otago University departments, and student research groups. The DCC recommends the government draw on this knowledge to assist in other areas around Dunedin and nationally.

Te Ao Māori

26. Consistently successful engagement with iwi Māori results in better decision-making, more robust and lasting solutions and more engaged people and communities. The DCC is also moving towards a future where it will be business as usual for our staff to view council work through a Māori responsiveness lens.

27. The DCC is committed to growing our partnership with mana whenua through considered collaborative engagement as befitting Treaty of Waitangi partnership. The DCC is currently developing a Māori Strategic Framework, as part of a broader strategic refresh project.
28. The DCC would like further information about how the mātauranga Māori values that are referenced in the NAP will be implemented locally. The DCC notes that the NAP is underpinned by the Rauora Framework. The DCC would appreciate greater clarity on how the framework will support mana whenua climate/environmental values.
29. The DCC would appreciate research and data gathering towards informing any approach to the treatment of Māori land (as discussed in Question 70), and a tighter definition around who is a 'Māori Land Owner'.
30. The DCC notes the importance of cultural competency and historical knowledge in informing the treatment of Māori land, and would like more information about how this will be assessed and then incorporated into the NAP.
31. The DCC encourages a thorough and appropriate engagement across Te Ao Māori communities in the development and implementation of the NAP.
32. The DCC would like a stronger role for local government and iwi Māori in the design, implementation and monitoring of the actions in the NAP.

Civil Defence and Emergency Management

33. The DCC's Civil Defence Emergency Management activity contributes to its commitment to being a sustainable and resilient city, with a strong link to the strategic direction of "Safe and Healthy People" as detailed in its Social Wellbeing Strategy 2013-2023.
34. The DCC has a statutory role to plan and provide for all matters of civil defence and emergency management within its district. This is delivered by the activity through planning with a wide range of organisations, including the ORC, to ensure a coordinated response to and recovery from emergency events, maintaining emergency facilities and equipment, delivering training and public education programmes and ensuring the city has the latest hazard information available to it.

Concluding remarks

35. The DCC would like the principles of a 'Just Transition' to be embedded in all actions included in the NAP.
36. The DCC would appreciate further information on how the actions included in the plan will be budgeted for, and how financial support for actions managed at a local level will be funded. This includes the ongoing costs of data, information and evidence to support ongoing climate adaptation decision-making.
37. The DCC would like the intergenerational equity of debt funding public adaptation works to be considered in developing and implementing the NAP.

38. The DCC would like clarity on the current decision-making pathway for climate change adaptation across statutes and the likely data, information, and evidence requirements to support that process.
39. The DCC recognises a need for better alignment and integration of data, information and evidence requirements and decision-making processes across legislation for climate change adaptation.
40. The DCC welcomes the release of the Rauora Framework, and the further integration of transformative approaches to adaptation, grounded in Te Ao Māori. The DCC is committed to embedding a Treaty-based enduring partnership approach with iwi Māori across adaptation approaches.
41. The DCC encourages the government to actively consider how the development of the managed retreat framework and Climate Adaptation Act could address the complex technical, legal, social and financial issues likely to be relevant to the urban planning future of South Dunedin and other affected areas.
42. If you would like to clarify any of the issues raised in the submission, please do not hesitate to get in touch.
43. The Mayor or his delegate would like to speak to this submission.

Kā mihi



Aaron Hawkins
MAYOR OF DUNEDIN