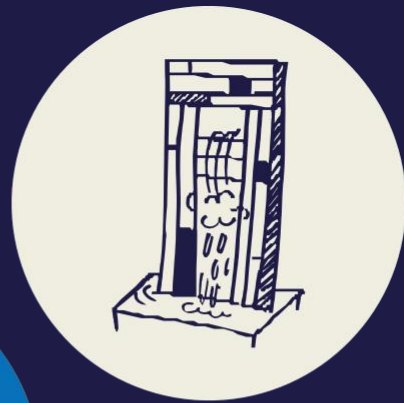


# HAMILTON CITY COUNCIL SUBMISSION

## Draft National Adaptation Plan: April 2022 Consultation Document

Ministry for the Environment



7 June 2022



**Hamilton  
City Council**  
Te kaunihera o Kirikiriroa

# Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to the priority '**A green city**'.

The focus of this priority is to become a sustainable city by challenging the way we grow our city and how we live within our city. To achieve this, we want to take a thoughtful and city-wide partnership approach between businesses, organisations and community groups to tackle how the city responds to climate change.

## Council Approval and Reference

This submission was approved (under delegated authority) by the Chair and Deputy Chair of Hamilton City Council's Environment Committee (as resolved at the Council's 10 May 2022 Environment Committee meeting).

Hamilton City Council Reference D-4188382- Submission # 687

## Key Messages

1. While Hamilton City Council supports in general the **Draft National Adaptation Plan**, we do have a number of significant concerns about the Draft Plan's overall direction and content.
2. The content/points raised in this submission reinforce and build on the work of previous submissions made by Hamilton City Council in the climate change space.
3. Hamilton City Council support the need for a National Adaptation Plan and commends the work proposed and underway across all sectors to respond to Climate Change. We acknowledge that the work proposed is far reaching, addresses all sectors and offers many opportunities.
4. While we support many of the reform and changes underway and proposed in the Draft Plan, we find that the Plan underestimates the changes required in the corporate and economic sectors to achieve future proof systems that will help us survive climate change.
5. A strong partnership approach is required with local governments, community, iwi-Maaori, and business. We would like to see a stronger lead for collaboration and more innovative direction in addressing the change.
6. We support the aims to create more resilience within the current economic system, our natural environment, and communities, but feel a wider definition of what resilience means for our communities and local economies and a firmer strategic direction to achieve this is required.
7. The Draft Plan does not address the risk of operating within a fragile and unsustainable global economy, address changes needed to create security within our food systems or offer a clear enough pathway for communities to build the capacity to respond or the resilience to adapt.
8. A stronger focus is required to build resilience through our communities, businesses, economy, with an emphasis towards the opportunities to address social inequity that these opportunities bring. We would like to see more focus on the opportunities directly within the community, such as increasing social enterprise, community energy and food systems.
9. The Draft Plan offers a mostly market-driven response. Driving a circular economy as outlined in the recently released Emissions Reduction Plan is only part of a wide range of required solutions.
10. We are concerned that although it is made clear that local government has a major role to play in Climate Adaptation, there has not been sufficient and meaningful consultation. We are not aware of any workshops or opportunities to input, discuss or understand this Draft Plan before its release. Given the extremely short timeframe to respond to the Draft Plan, it is not possible to engage our business adequately to provide qualitative feedback or add any substantial local insights across the substantial number of new policies and reforms.
11. The Draft Plan offers no indication of providing guidelines to councils for adapting infrastructure, land use and engaging communities to the impacts of climate change.
12. With an urgent need for local government to respond to both adaptation and mitigation and a wide-reaching amount of change and reform to address, there appears to be no review of the current inadequate funding models, to address climate adaptation. We therefore recommend that a review of funding models be undertaken to respond to adaptation needs.
13. More clearly defined roles and responsibilities for individuals, iwi, communities, businesses and government are required in the Final Plan, with a defined framework for central and local government collaboration. Without clear responsibility (including defined funding mechanisms), there is a significant risk of inaction (and litigation).

14. For successful planning and implementation, the Final Plan also needs to include the individual actions that councils can take prior to 2024 to adapt to and build for risks. This would assist in supporting Focus Area 2 (Data Provision) and Focus Area 3 (Embedding Climate Resilience).
15. The Draft Plan focuses on government initiatives and actions underway. However, a large proportion of that restates the existing government settings and initiatives in place. Council recommends an incorporation of the direct linkages between the initiatives and objectives of the Draft Plan.
16. Council recommends that the Final Plan hold the lead agencies accountable for implementing the proposed initiatives and work programmes. It would be helpful to provide engagement details or a place for engagement for local councils to participate in and feed into some of the upcoming and proposed actions.
17. As we will never know when, where and to what scale or what level of destruction the next climate disaster will hit, we need to build diverse economies and food systems needing not only diversity on a global, national and local economic scale, but that are also diverse in the way that communities benefit (as opposed to only the current system that continues to profit shareholders and drive the economic divide).
18. We also support the following key points in LGNZ's submission to the Draft Plan:
  - *New Zealand's first National Adaptation Plan and the milestone it represents is notable.*
  - *However, the Plan is unambitious and fails to respond appropriately to impacts already being felt by communities, and the latest sea level rise predictions. A much stronger plan is needed, which outlines meaningful, outcome focused actions; provides direction to local government, communities and other stakeholders; provides local government with support and resources to undertake community engagement on adaptation; and clarifies funding and investment mechanisms, priorities and thresholds – including a scenario-based, outcomes focused approach to establishing Crown investment and funding.*
  - *The Plan does not reflect partnership or collaboration with local government, or iwi/Māori, communities or business. Partnership is critical to the success of adaptation.*
  - *The important and proactive climate adaptation work LGNZ, local government and communities have achieved and are delivering needs to be reflected in the Plan.*
  - *We support requiring an integrated, collaborative, joined up, intergenerational process for communities to drive and inform adaptation action in their rohe.*
  - *The proposed managed retreat framework part of the consultation will have the most widespread and long-term benefit for New Zealand.*
  - *However, reference to the other stages of adaptation – protect and accommodate- need to be included. We recommend four areas as the most urgent and needed in the Plan:*
    - *Sharing the costs of adaptation;*
    - *Government investment in resilience;*
    - *A co-designed national framework; and*
    - *Better integration with wider reforms impacting on local government and communities.*
  - *The Government would be wise to invest proactively now, to reduce community risk to tolerable levels and reduce the need for costly, reactive input.*

- *Despite the Plan, business as usual will continue. Local government will continue to play a leading role in risk management and adaptation. Transformational changes will come from outside of central government. Therefore, LGNZ and the local government sector should be a partner in the Government's ongoing climate change adaptation work.*

## Introduction

19. Hamilton City Council appreciates the opportunity to make a submission to the Ministry for the Environment's **Draft National Adaptation Plan** (the Draft Plan).
20. The content/points raised in this submission reinforce and build on the work of previous submissions made by Hamilton City Council in the climate change space - refer point 25 below.
21. Hamilton has a population of almost 180,000 and is defined as a Tier 1 City under the National Policy Statement for Urban Development. All Tier 1 locations must provide for growth and change District Plans by August 2022 to enable this growth. The population of the subregion is projected to increase by around 30 percent over the next 30 years. This gives rise to a range of complex issues affecting land use, management of natural and physical resources, transport and essential infrastructure provision, all in the face of climate change.
22. Hamilton City Council support the need for a National Adaptation Plan and commends the work proposed and underway across all sectors to respond to Climate Change. We acknowledge that the work proposed is far reaching, addresses all sectors and offers many opportunities.
23. While we support many of the reforms and changes already underway and proposed in the Draft Plan, we find that the Plan underestimates the changes required in the corporate, economic and infrastructure development sectors to achieve future-proof systems that will help us survive climate change and how the changes need to align.
24. Hamilton City Council supports the submission made by LGNZ to the Draft National Adaptation Plan (refer to the key points in LGNZ's submission - reproduced in point 18 above).

## Previous Submissions made Covering Climate Change

25. Hamilton City Council takes a considerable interest in matters regarding climate change and has made a number of submissions that address this issue in recent years - for example:
  - Hamilton City Council's 16 March 2022 initial submission to the **Waikato Region Public Transport Business Improvement Review** - refer [here](#)
  - Hamilton City Council's 24 February 2022 submission to the November 2021 consultation document **Proposed Product Stewardship Regulations: Tyres and Large Batteries** - refer [here](#)
  - Hamilton City Council's 10 December 2021 submission to the October 2021 discussion document **Taking Responsibility for our Waste: Proposals for a New Waste Strategy - Issues and Options for New Waste Legislation** - refer [here](#)
  - Hamilton City Council's 24 November 2021 submission to the October 2021 consultation document **Transitioning to a Low-Emissions and Climate-Resilient Future: Emissions Reduction Plan** - refer [here](#)
  - Hamilton City Council's 16 November 2021 submission to the **Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill** - refer [here](#)
  - Hamilton City Council's 4 November 2021 submission to the **Land Transport (Clean Vehicles) Amendment Bill** - refer [here](#)

- Hamilton City Council's 4 August 2021 submission to the **Inquiry on the Parliamentary Paper on the Exposure Draft - Natural and Built Environments Bill** - refer [here](#)
- Hamilton City Council's 3 August 2021 submission to the **Government Policy Statement on Housing and Urban Development (GPS-HUD) - June 2021 Discussion Document** - refer [here](#)
- Hamilton City Council's 2 July 2021 submission to the May 2021 consultation document **Infrastructure for a Better Future: Aotearoa New Zealand Infrastructure Strategy** – refer [here](#)
- Hamilton City Council's 25 June 2021 submission to the **Transport Emissions - Pathways to Net Zero by 2050 - May 2021 Green Paper** - refer [here](#)
- Hamilton City Council's 23 June 2021 submission to the **Gas Market Settings Investigation Consultation Paper** - refer [here](#)
- Hamilton City Council's 26 March 2021 submission to the **Climate Change Commission - 2021 Draft Advice and Supporting Evidence to Government** - refer [here](#)
- Hamilton City Council's 16 October 2020 submission to the **Proposed Changes to Assist Reducing Carbon Emissions in the Building and Construction Sector** - refer [here](#)
- Hamilton City Council's 2 July 2019 submission to the **Climate Change Response (Zero Carbon) Amendment Bill** - refer [here](#)

26. All submissions made by Hamilton City Council can be accessed [here](#)

## General Feedback

### STRATEGIC DIRECTION

27. We largely support the 140 programs, packages, reforms and policy changes presented in the Draft Plan. However, although these actions present lots of steps in the right direction, a clearer and bolder strategic direction for the Final Plan is needed.
28. Bolder and more ambitious strategic actions are required particularly to build community resilience, strengthen local economies, and address social inequities. We support the aims to create more resilience within the current economic system, our natural environment, and communities, but feel a stronger definition of what resilience means within our communities and firmer strategic direction to achieve this is required.
29. Council supports the strong focus on gathering data and providing information. Data is valuable to help us understand how regional areas, agriculture, biodiversity etc will be impacted. It is important to note we cannot accurately predict exactly what the impacts of climate change will be, and when they will hit. IPPC reports over many decades demonstrate that the science constantly changes, and each report shows that the rate of predicted risks is coming faster than the previous prediction.
30. There should be a stronger strategic emphasis in building resilient communities, increasing biodiversity, diversifying our food chain and economic and infrastructural dependencies so that we are stronger to withstand both the predictable and unpredictable changes to local climate and respond to emergency weather events. We strongly support modernising the emergency management system to deal with the scale of climate change that is coming.
31. Council also notes that food security is a key adaptation issue that is severely under-represented in the Draft Plan and needs a strategic response.

## PARTNERSHIP

32. A strong partnership approach is required with local government, community, iwi-Maori and business. Effective consultation seems to have been limited in creating the Draft Plan, which is lacking in a collaborative approach. This poses a risk to the effective delivery of the Plan across key areas.

## ACTIONS TO BE TAKEN

33. The Draft Plan needs to present stronger ambition for bold action. For example, the recommendations from the CCAT working party state that there is a need to *“Be informed.... organised... and take dynamic action”*. This business-as-usual approach in the Draft Plan does not align with current projections from the IPPC and the magnitude of the challenge. We would like to have more confidence that the government is rising to this challenge and setting the bar for councils, corporates and communities to be bold. We would like to see an ambitious strategic approach that supports more urgent actions to future proof our cities, build resilient communities and responds in accordance with the magnitude of the challenge.
34. We would also like to see a stronger emphasis on public education campaigns and resources to execute campaigns. Our response to Climate Change requires communications to the same scale that the government responded to Covid-19. It is not adequate to expect councils to engage the community effectively on climate adaptation or mitigation without a large-scale national campaign. The Gen Less campaigns are not driving the level of education and behaviour change required, and do not touch on how we need to adapt to climate change.
35. There is not a single type of service or business that does not need to address climate mitigation and adaptation. More recognition of the skills shortage, capability and capacity to adapt to climate change across the country is required. Recognition should include funding and training programmes to support councils, businesses and communities to increase knowledge, capacity or skillsets to mitigate and adapt to climate risks. Upskilling and integrated climate change courses should be designed for tertiary education providers, local councils, organisations, infrastructure, business, agriculture, horticulture and industry sectors.
36. A large proportion of the Draft Plan restates existing government settings and initiatives in place and focuses on government initiatives and actions already underway. Hamilton City Council recommends an incorporation of direct linkages between the initiatives and objectives of the Draft Plan. For example, 1. Specific outcomes from the initiatives that lead to resilience, risk mitigation and adaptation. 2. Specific guidance and support that local councils can expect coming from the central government. 3. An indication of available funding sources to enable councils to effectively participate in meeting the objectives of the Plan.
37. Overall, the Draft Plan doesn't align with the speed in which action must be taken based on latest IPPC reports. For example, the Climate Change Adaptation Act is not due until 2024 and therefore there will be no funding until 2025.
38. Hamilton City Council recommends that the Final Plan hold the lead agencies accountable for implementing the proposed initiatives and work programmes. It would be helpful to provide engagement details or a place for engagement for local councils to participate in and feed into some of the upcoming and proposed actions.

## OUR CLIMATE REALITY

39. Hamilton City has an urban landscape and regional economic activity that is underpinned and serviced by significant three waters infrastructure. This infrastructure is an important factor for both climate change resilience and mitigation.



40. The Draft Plan and 2020 National Climate Change Risk Assessment consider *“Risks to potable water supplies (availability and quality) due to changes in rainfall, temperature, drought, extreme weather events and ongoing sea-level rise”* as one of the 10 priority risk areas. (Page 10).
41. The Draft Plan mentions (and Council agrees) that weather events such as heavy rainfall and flooding are likely to be more frequent and intense, and there will be periods of drought. This will put significant ongoing pressure on the water supply system and management. (Page 8). For Hamilton City, the risk of water availability is a reality. Hamilton City’s municipal supply water is drawn from the Waikato Awa which is very close to being fully allocated. Substantial central government investment in wastewater and stormwater infrastructure funding is required.
42. The need to respond to severe weather events also conflicts directly with other direction from central government, such as the requirement for higher density development in the NPS-UD. New high density housing developments must be built to withstand predicted climate change events; for example, ‘green’ and/or permeable surfaces are required to withstand increased stormwater surges.
43. The Draft Plan mentions that several councils are already addressing the impacts of climate change and proactively integrating climate risk into current and future planning. It would be helpful if the Final Plan included examples of existing initiatives underway for other councils to incorporate into their strategies. (Page17).
44. The Draft Plan mentions (and Council agrees) that local governments are at the forefront of climate response. (Page 17). This includes responsibilities to plan for and invest in improving community resilience. Council has an existing programme of work aimed at flood risk management activities, but this can be expensive and time consuming to execute. Hamilton City Council recommends that the Final Plan consider provision of specific financial assistance to local governments in terms of programmes in place to mitigate flood risk and drought.
45. Hamilton City Council also recommends that the Final Plan mentions that local government needs a streamlined system of decision-making between the regional and district and city councils. This would also require significant inter-council communication, alignment and reprioritisation, which would require a firmer direction and assistance from the central government.

## System Change

### GENERAL COMMENTS

46. Systemwide objectives include having legislation and institutional arrangements in place that provide clear roles and responsibilities; having accessible robust information; having tools and guidance and methodologies for adaption and unlocking investment.
47. Hamilton City Council supports these objectives as they will provide the support needed to make good decisions on where and how to build for resilience, and guide adaptation.
48. However, although we support that the National Adaptation Plan is far reaching in both its objectives and programs and is integrated through a large amount of government policy, the Draft Plan reads as a collection of activities, mostly already underway and needs a stronger overarching strategic approach.
49. The Draft Plan doesn’t respond to the risk of operating within a fragile and unsustainable global economy, address changes need to create security within our food systems or offer a clear enough pathway for communities to build the capacity to respond or the resilience to adapt.
50. The Draft Plan notes that local government provides a critical link between climate change adaptation policy and communities through its planning and emergency management functions and community engagements. Nationally consistent policy guidance is needed to assist in this. National policy could preclude activities that are not resilient to climate change. This would support national direction.



51. Hamilton City Council believe that the new tools, guidance and methodologies set out in the Draft Plan are on the right track for Council and its community, iwi and hapū, and businesses or organisations to assess climate risks and plan for adaptation. (Question 7). However, central government need to address further the guidance, funding, resourcing required for local government to succeed. Collaboration and wider share of responsibility is required. More consultation with local government is required to get this right.
52. Council recommends definition of roles and responsibilities, and funding mechanisms available to meet responsibilities, and a framework for how and when collaboration will occur between governments and agencies and communities.
53. For successful planning and implementation, the Final Plan also needs to include the individual actions that councils can take prior to 2024 to adapt to and build for risks. (Page 28). This would assist in supporting Focus Area 2 (Data Provision) and Focus Area 3 (Embedding Climate Resilience).

## RESPONSIBILITIES

54. More clearly defined roles and responsibilities for individuals, iwi, communities, businesses and government are required in the Final Plan, with a defined framework for central and local government collaboration. Without clear responsibility (including defined funding mechanisms), there is a significant risk of inaction (and litigation).
55. We understand reform is needed. Whilst on the whole Council is in support many of the proposed system changes that are placed with local government, there are much wider changes required. Local governments are not driving the unsustainable systems that are causing climate change. Our economic and corporate systems need to transform to set a sustainable path to steer away from catastrophic climate change, and to also respond to the required climate adaptation already left in their wake.
56. We believe much more thought should be given to how corporates will respond to and fund a response to climate change. Sustainability is now becoming a key part of how businesses and corporations operate. However, this can be 'tokenistic', misleading (greenwashing) and profit is still the bottom line. This system has already taken once abundant and robust ecosystems to the fragile brink we face today. A new direction, beyond triple bottom line reporting, must come from government that requires companies to ensure that the environment becomes the bottom line, and key industries must contribute to the regeneration of what is lost.
57. Hamilton City Council request a review of corporate responsibility in New Zealand, to ascertain what models could be applied to ensure there is a strong role from corporations in the protection and regeneration of our ecosystems.
58. Guidance on how local governments will develop adaptation plans with communities is not made clear in the Draft Plan. There needs to be a consistent approach and scope to achieve local assessments and plans. To achieve the scale of change needed, central government must consider more closely how it can work with local government to ensure we are not each developing and paying for (or lacking) the tools we need to deliver (for both adaptation and mitigation).
59. We would like to see strong leadership from central government to provide a cohesive approach to developing and delivering the communications, education, planning, technical tools, skills and capacity that local government will need to deliver both adaptation and mitigation.

## FUNDING MODELS AND MECHANISMS

60. With an urgent need for local government to respond to both adaptation and mitigation and a wide-reaching amount of change and reform to address, there appears to be no review of the current inadequate funding models, to address climate adaptation. Hamilton City Council recommends a review of funding models to respond to adaptation needs.

61. The Draft Plan states that local ability to fund adaptation and flood protection is likely to be a challenge, as many among the population have very low incomes, as measured by the socio-economic deprivation index. Meeting these costs may be beyond the financial capacity of the ratepayers and councils. (Page 34). Hamilton City Council recommends that the Final Plan includes development of a National Adaptation Fund, similar to the Climate Emergency Response Fund. (Page 39). This will enable councils to effectively respond and adapt to climate change.
62. Developing funding and investment mechanisms to incentivise and support investment into resilience measures should be prioritised now (rather than 2025). How the Climate Emergency Response Fund can be utilised to support building community resilience and climate adaptation should also be addressed now.
63. The role of industry in funding the response to the climate crisis must be considered. Society can no longer afford to support a system that allows business and corporates to degrade and destroy the environment, while the onus to respond, repair and regenerate is put on to the taxpayers and ratepayers.
64. There also needs to be alignment of funding cycles between local and central government to effectively deliver on strategic and spatial planning where this requires adaptation for resilience.

#### INTEGRATION BETWEEN REFORMS

65. Significant Local Government, Resource Management, Emergency Management and Three Waters reforms are underway. In general, Hamilton City Council supports the outcomes sought from such reforms. However, these must be carried out as an integrated and coordinated package. Council has previously recommended in the 'Infrastructure for a Better Future – Aotearoa New Zealand Strategy' that the role of the Infrastructure Commission is critical to help coordinate reforms to achieve key benefits relating to infrastructure and how it responds to climate change – refer [here](#)
66. In its submission on Resource Management Reform 'Opportunities to Improve System Efficiency (May 2021), Council considered that the Resource Management Act reform could support the Water reform programme. Council supported linking spatial planning legislation and freshwater reform to maximise infrastructure resilience. The proposed new Acts and integrated planning can lead the way for carrying out robust infrastructure resilience planning and managing climate change adaptation in a consistent way and recognition of geographical hazard constraints via spatial planning. This will provide efficiency and certainty for decision-makers and the development community.
67. A significant impediment to successful strategic and spatial planning and climate change adaptation are competing priorities that are emerging between different government departments, policy and legislation. This includes competing priorities between the requirement for higher density development (National Policy Statement - Urban Development and the Housing Supply amendment Act) and the need for increased resilience or managed retreat. These competing issues need to be resolved across central government as they will result in significant time and cost for local government to address. The Final Plan needs to consider how these tensions between legislation will be addressed.

#### MANAGED RETREAT

68. Legislation is proposed to support managed retreat. Hamilton City Council agrees with LGNZ that the proposed managed retreat framework part of the consultation will have the most widespread and long-term benefit for New Zealand.

- 69. Managed retreat could require new infrastructure for displaced and relocated people or upgrading existing infrastructure to provide additional capacity and withstand new conditions. This could put further service and financial pressure on the water supply system in terms of both quantity and quality of water needed to be supplied to the community. Central government funding and guidance will be required.
- 70. Managed retreat away from Hamilton would require significant shifts in planning and alteration of existing water networks and scope of services. (Page 28). Hamilton City Council recommends that the Final Plan incorporates transition risks arising from adaptive measures.
- 71. There needs to be shared responsibility for both the costs (and action) required for adaptation such as managed retreat. Risks and responsibilities should be shared across property, landowners, business owners, local government, central government, and banking and insurance entities.

#### DATA AND INFORMATION SHARING

- 72. Hamilton City Council agrees that data to support resilience planning and adaption is essential. A minimum standard of data should be set to ensure greater levels of efficiency and consistency between infrastructure providers and industry members (and as a result, greater outcomes).
- 73. Hamilton City Council supports the proposal to develop and implement a common set of guiding standards and protocols to ensure consistency in the format and delivery of digital information. This should be done in consultation with industry.
- 74. Council notes that the Draft Plan does not recognise the enormity of producing data (such as flood hazard data and mapping) and communicating data with community. The onus appears to be pushed onto local government. Hamilton City Council consider that central government should have the role of ensuring consistency of information (i.e., data format), standards and getting 'buy in' from all infrastructure providers and providing that clarity in the Final Plan.
- 75. **Central Government should provide funding mechanisms to enable both the collection and distribution of information.** Without this funding, there will be delays in achieving plan objectives if infrastructure providers do not have the time, funding, and more importantly the resources to undertake any works required.
- 76. Guidance is also required on how to manage the uncertainty around climate models, especially given the long lifetime of some infrastructure.

#### CRITICAL AND SUPPORTING ACTIONS – FOCUS AREA ONE

- 77. Hamilton City Council considers that many aspects of institution reforms listed under Critical Actions will assist with achieving climate change adaption outcomes. Council does have some concerns around this, as noted in its 4 February 2022 submission to the **Working Group on Representation, Governance and Accountability of new Water Service Entities** - refer [here](#)
- 78. Hamilton City Council supports the supporting actions, especially those relating to establishing a foundation for working with Maaori on climate change, implementing the Natural Disaster and Resilience Strategy, and developing emergency management workforce especially where this relates to three waters infrastructure. Council is in support for more comprehensive support for implementation.

## **CRITICAL AND SUPPORTING ACTIONS, AND PROGRAMME OF TARGETED GUIDANCE – FOCUS AREA TWO**

- 79.** Hamilton City Council supports the critical actions, especially those relating to providing climate change projections and completing a case study on co-investment for flood protection. This will be important for Council planning for the future for the four well beings, developing appropriate resilience standards and specifications for infrastructure (and property), and looking at ways for affordable protection.
- 80.** Hamilton City Council supports the programme of targeted guidance for adaptation and is pleased to see that there is some urgency afforded in the timeline.

### **EMERGENCY MANAGEMENT**

- 81.** We support the need to modernise the Emergency Management system and agree that Climate Adaption will require us to adopt a new approach moving forward.
- 82.** Release of the Draft National Adaptation Plan is timely from an Emergency Management perspective as firstly the Waikato CDEM Group is underway with the Trifecta Programme that will ensure the Act, Plan Order/Guide, and NDRS Roadmap are aligned in content and outcomes, as well as ensuring the projects are coordinated and aligned with other NEMA projects and workstreams. This can coincide with the National Adaption Plan that will likely have application in the Natural Environment and system changes.
- 83.** Additionally, the Waikato CDEM Group is about to embark on a risk assessment process to support the development of their next five-year Group Plan (a legal requirement). There is a requirement to reassess the risks associated to the regional hazards to help determine the Group's priorities for the next 5 years. A number of the hazards within the current Group Plan have had further research in the past few years and have potentially changed the Group's understanding of the consequences to the region. Climate Adaption will require the Waikato CDEM Group to adopt a new approach moving forward.

## **Natural Environment**

- 84.** Hamilton City Council strongly support the need for nature-based solutions in urban environments but would also like to see an active approach to increasing the percentage of nature and indigenous biodiversity in urban areas.
- 85.** We are in strong support of the need to consider our Natural Environment throughout our adaptation response.
- 86.** We strongly agree that nature-based solutions buffer against climate impacts, while also fostering wellbeing, sequestering carbon and increasing biodiversity.
- 87.** As mentioned in the Draft Plan, invasive species and climate change are a significant threat to New Zealand's native species. Urban growth and intensification, deforestation, wetland drainage and the degradation of eco systems are also significant threats not mentioned.
- 88.** We largely agree with the critical and supporting actions that are outlined in the Draft Plan, although note that there are a large number of programs that are already underway. The approach seems far reaching but lacking in strong strategic direction.

89. We agree to the critical action to implement the DOC Climate Change Adaptation Action Plan with the aim of understanding what actions are needed to protect our native biodiversity. This is vital and will need to be ongoing, we do know that climate change is and always will be unpredictable. At the same time taking immediate action to protect our remaining natural ecosystems is vital and mobilising a national effort to restore native biodiversity is required.
90. We strongly agree with the need to establish an integrated work programme to deliver climate, biodiversity and environmental outcomes. We think this is a critical action and needs higher priority.
91. We strongly agree on the action to implement the National Policy Statement on Indigenous Biodiversity and believe this should have a stronger emphasis to ensure landowners and councils protect existing mature and high functioning biodiversity as a preference to restoring degraded and lost ecosystems. Restoration is a significant investment and outcomes are achieved over long timeframes.
92. We would like to see a more significant response to increasing nature in urban environments. Our cities will continue to grow and intensify, encroaching on our rural areas and further degrading ecosystems. Increasing native green spaces can also reduce and treat stormwater runoff, reduces urban heat island effect and improves health and wellbeing.
93. Hamilton City Council has recently invested \$29 million over 10 years into our Nature in the City Programme, with the aim of increasing native vegetation in Hamilton from 2% to 10% by 2050. We see this as seed money to leverage additional funding from other parties, including central government. We know that a byproduct of this planting will be carbon sequestration - in fact one of our community restoration groups recently reported they had planted more than 20,000 trees along the Kukuataaruhe gully, potentially sequestering 94 tonnes of carbon dioxide from the atmosphere every year, for at least the next 50 years.
94. Clarifying these benefits more accurately and reporting on them is an important part of our programme and central government could assist through research into and application via ETS "look up tables" of planted native forestry. The current carbon look-up table for natives is currently accurate only for naturally regenerating kanuka/manuka shrubland.
95. We support the need to improve biosecurity outcomes on dairy, sheep and beef farms. However, we question where the response is to both diversifying farming industry to more nature based farming solutions and increasing the native biodiversity on farming land.

## Homes, Buildings, Places

96. Hamilton City Council strongly support plans to build public and private housing to reduce exposure to climate hazards and withstand extreme weather.
97. We support the need to understand what requirements will need to be made for existing housing stock.
98. We support the need for property-level guidance to inform homeowners and renters but believe incentives and loan schemes to support increasing resilience are also required.
99. There needs to be minimum standards for cooling homes as well as heating homes. New builds must be built to maximise passive heating and cooling design The opportunities to require or incentivise retro fitting for bad passive design should be considered for homeowners and landlords. Lighter roofing and paving, adding louvres and awnings or tinted glass, and requiring air conditioners for rented properties all must be considered as our summers become hotter.

100. There is a need for universally designed standards for new housing. Disabled people have particular difficulties with accessing homes and many would also be more vulnerable to heat, so it would help if new homes were designed to meet a minimum standard of accessibility.
101. We support the need for an assessment framework to help building owners, developers and new home builders to identify climate hazards, however we believe developers should be expected to start acting on this sooner.
102. We believe there needs to be a strong legislative stance to ensure all new building developments have both climate adaptation and mitigation plans. This should be acted upon swiftly. We do not need to research all the risks and opportunities before requiring the industry to start taking responsible action based on current knowledge and best practice.
103. The Draft Plan mentions the need to improving homes and buildings so they can withstand the expected range of temperatures, rainfall and wind and to improve energy and water efficiency. This section could be expanded to incorporate rainwater systems and risks associated with it. (Page 55).
104. It would be useful to expand the glossary section to include definitions of some key terms used to define assets, for example – definition of public buildings (and whether a water treatment plan would be one). (Page 58).
105. As stated previously in other sections, standards and guidelines that provide opportunities for new buildings that support climate change objectives is needed. Refer Hamilton City Council’s 16 November 2021 submission to the **Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill** - refer [here](#)

## Infrastructure

### GENERAL COMMENTS

106. Hamilton City Council supports objectives for infrastructure (reduce vulnerability, infrastructure fit for changing climate, and use of renewal programmes to improve adaptative capacity).
107. In general, Hamilton City Council also supports the actions across other outcome areas that contribute to resilient infrastructure. Of particular importance is addressing risk to potable water supplies. Council has legislative responsibilities to health and sanitation needs, protecting the awa, and ensuring the health and wellbeing of its community.
108. The importance of three waters infrastructure to be resilient and also ‘manage’ the effects of climate change for the community cannot be understated. It is important that three waters infrastructure is seen as significant, alongside other infrastructure defined as significant (such as hydropower). The Final Plan should support recognition of three waters infrastructure significance and define it as being nationally significant.

### POLICY DIRECTION

109. With regard to system reform, Hamilton City Council agrees with water reform objective to “*deliver water services in a sustainable and resilient manner that seeks to mitigate the effects of climate change and natural hazards*”. (Page 70). However, meeting the objectives of the Draft Plan would require new water entities to develop specific policies to enable resilience and adaptation. It would be beneficial for local governments and entities to receive clearer direction to shape those policies and operational changes.

110. To increase resilience and manage climate change effects such as drought, there is a need to diversify and find alternatives so that our water, energy, waste and systems are not all reliant on one central system. The Final Plan needs to consider how this can be achieved, and how this can be supported through legislation and policy. For example, water sensitive devices could be either mandated or households and communities provided incentive schemes for water tanks, no flush toilet systems, off grid renewable energy.

#### PLANNING FOR RESILIENCE

111. In its 16 November 2021 submission to the **Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill** (refer [here](#)), Hamilton City Council noted that a key focus of spatial planning is the protection of future corridors or areas for public infrastructure, and that the current designation process was unsuitable. Protection of corridors for critical infrastructure, due to location and geography, provides for infrastructure resilience, and, in turn, provides resilience to communities. This protection is important to achieve the plan's vision and should be noted as an action.
112. To achieve this, there will need to be a program of identifying future critical infrastructure corridors, providing legislative change and tools to protect corridors and provide for lead infrastructure. An action for designations for future critical infrastructure (such as municipal water supply and wastewater services) should be considered in the Final Plan.
113. Greater recognition of the role that the transport corridor has to play as blue/green corridors within communities and provision of stormwater/flood management is needed. There is an increasing need to have safe and dedicated facilities for walking, cycling/scooting and public transport to provide genuine mode choice over light vehicle use. This will require wider corridors and funding to maintain infrastructure to a higher level of service.
114. There is a need to have greater capacity in stormwater facilities as climate change is resulting in greater frequency of high intensity rainfall events. This will not only impact on corridors - it will also impact on the provision of developable land for growth, affordable housing and legislative requirements of NPS-UD on Tier 1 cities.
115. Opportunities for further alignment between national and local government could be achieved via the recognition of the role of the Government Policy Statement (GPS) on Land Transport – noting that this document guides Waka Kotahi NZ Transport Agency in the development of the National Land Transport Programme and regional councils in the development of Regional Land Transport Plans and Regional Public Transport Plans.
116. New developments require a natural hazard assessment, including an assessment of residual risk prior to intensification planning instruments. For example, Hamilton City Council is accelerating its programme to produce 100-year flood hazard mapping to cover the entire city. In the absence of this information significant developments will go ahead on land potentially affected by flood hazards putting people and property at risk. See Hamilton City Council's November 2021 submission to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill - refer [here](#)

#### MAATAURANGA MAAORI AND EDUCATION

117. Hamilton City Council strongly supports the promotion of the inclusion of maatauranga maaori into managing adaption, and further understanding and minimisation of impacts to cultural heritage. This aligns with Council's 'He Pou Manawa Ora Strategy'.
118. As infrastructure planners and providers, we particularly support the action of raising awareness of climate-related hazards and how to prepare for them. As noted previously, support from central government is needed for national education campaigns on climate adaptation and what it means for communities.



## CRITICAL AND SUPPORTING ACTIONS

119. Hamilton City Council supports the Critical Actions listed for infrastructure. This will assist with achieving climate change adaption outcomes, especially those relating to development of methodology for assessing risks to infrastructure, and development of codes and specifications for infrastructure resilience. It is important in a high growth city, that all new infrastructure specification requirements are understood by the development community and major infrastructure providers.
120. Hamilton City Council notes that the development of a standard or code for infrastructure only has a timeframe for scoping (2022-2024) but does not have a timeframe for development. The timeframe should be determined and stated so that infrastructure providers may plan for this.
121. Council is concerned about revisions to legislation, standards, building codes that are not aligned. This will cause frustration, non-compliance and adaptation objectives will not be met. If housing standards do not meet climate change adaption requirements, then infrastructure may need to be upgraded, a huge cost to the community. All these planning tools, legislation, standards and codes must be aligned.
122. Hamilton City Council supports actions relating to increasing uptake of tools to invest in infrastructure in urban areas and supports the integration of climate adaptation and mitigation in new and revised standards. Council notes that the timeframes for these is not imminent and considers that the timeframe should be shortened.
123. For key infrastructure such as wastewater treatment plants and their conveyance systems, it is also important to progress discussion on investment management and integration of managing climate risks.

## Community

124. Hamilton City Council support that councils are well placed to understand the needs of their communities and places and are a crucial part of delivering solutions on the ground. Local councils will need to help communities adapt. We are concerned that the Draft Plan doesn't address or indicate the scale of funding, capacity building and communications that will be required, or the opportunities for community-led action or community enterprise.
125. We strongly support the outcome that our people, places and systems are resilient and able to adapt. We agree with the aims in this section, and fully support that communities need to understand the risks to their place and wellbeing so they can prepare for and respond to climate impact. The Final Plan would be strengthened by reflecting a wider understanding of the active role of the community to become climate resilient.
126. The approach to provide information and support could be strengthened by including a plan to offer opportunities for communities to work together to create the solutions on a local level. There is a wealth of opportunities to build capacity and resilience in communities, that are not being considered.
127. We would like the government to consider what role community-driven action can play, and what schemes can be put in place to support communities to start taking action to be more resilient and adaptive themselves. Consideration should be given to how our larger corporates can support communities, with investigation into what drivers will help large organisations find ways to ensure people's wellbeing and the environment are not harmed and are balanced alongside profit, and support communities to thrive as part of a climate response.
128. Achieving resilient communities has to be through a collaborative/co-design approach. Many community groups have been working to build climate resilience for decades. Strong leadership and direction would help local communities achieve outcomes that can be scaled and replicated.

- 129.** Resilience requires diversity, yet our economy, goods, services, food, energy and transport operate in the current global financial system which causes our economy to be extremely fragile (and has pushed our ecosystems and climate to their limit). Food security is a key issue that lacks in the Draft Plan and can partly be addressed by incentivising local food enterprises in our communities. Our society cannot be resilient to climate change without thriving local community economies.
- 130.** The Draft Plan offers a mostly market-driven response. Driving a circular economy as outlined in the recently released Emissions Reduction Plan is only part of a wide range of required solutions. The Draft Adaptation Plan aims to address equity issues such as energy poverty but is missing a plan for building social capital. We would like to see schemes to support our communities to thrive, such as incentivising community energy networks, community owned EV shared fleets, and start up social enterprise loan schemes.

## Economy and Financial Systems

- 131.** The Draft Plan identifies the economic risks that climate change is bringing. Putting a price on carbon, investigating carbon taxes and charges, and driving a circular economy will address some key flaws in our economic model. The current economic system is not resilient to market changes, so nor can it ever be resilient to climate change. We support these actions to help adapt our current economic system in the Draft Plan, but also think the opportunities to build resilience in local economies and address social inequity should be strengthened in the Final Plan.
- 132.** As we will never know when, where and to what scale or what level of destruction the next climate disaster will hit, we need to build diverse economies and food systems needing not only diversity on a global, national and local economic scale, but that are also diverse in the way that community's benefit (as opposed to only the current system that continues to profit shareholders and drive the economic divide).
- 133.** Global supply chain issues do not just relate to energy and fuel, which is currently impacted by the current war in Ukraine. We know climate change will exacerbate global supply chain issues and we must improve our local sustainable production opportunities for a more resilient economy.
- 134.** There are many models already used that can contribute to creating more diverse economies including social enterprise, farm to table schemes, urban community farms, community borrowing schemes, time banks, community energy schemes, community car share schemes and more. The government need to support and incentivise these schemes/systems as well as improving our current system.
- 135.** This is New Zealand's opportunity to innovate to build local and national economic systems that keep the goods, services and benefits within our own communities (thus addressing global supply issues, reducing carbon emissions, benefiting local communities and strengthening local economies).
- 136.** Climate Change demands the role of business and economics is transformed. We believe that both the first Emission Reductions Plan and the Draft Adaptation Plan are offering some sound tactics that will go some way to achieving that. However, we need to ensure the certainty that we have at least put all we can into action to avoid catastrophic consequences later this century. A stronger, more strategic and wider reaching approach is required to address the role of economics, business and communities.
- 137.** As previously suggested, Hamilton City Council request a review of corporate responsibility in New Zealand, to ascertain what further models could be applied (such as doughnut economics), and what frameworks, drivers and legislation needs to be in place to ensure there is a strong role from corporations in the protection and regeneration of our ecosystems.

138. Business needs legislation around climate just as there are legal requirements for Health and Safety. All businesses need firm legal requirements to have a climate adaptation and mitigation plan, and appointed climate adaptation and mitigation officers who are required to report to an independent body and have regular inspection. We know this model has transformed Healthy and Safety.

## Research Strategy

139. Hamilton City Council agrees that there are information gaps currently and supports a coordinated and comprehensive research platform to ensure research is available to inform effective adaptation. Council supports the need for more investment in research and information sharing. (Page 102).
140. Council recommends that the Final Plan specifically mentions that more investment needs to be made in the research for climate change implications for water networks and sources and identification of alternative sources.
141. Hamilton City Council also recommends that the Final Plan outlines funding options to be made available to local government to effectively participate in it.

## Monitoring and Reporting

142. With the ongoing 2-yearly review of the Plan, regular updates, compilation of data and developments of maps will be required, and Hamilton City Council may be expected to feed into it. This would mean that Council would need specialised technical resources in place to analyse and provide the relevant information. This would have a financial impact on the Council's resources. (Page 107).
143. In line with comments about alignment and coordination, it will be important to consider how data collection and compilation aligns with central government's (Taumata Arowai) proposed environmental performance monitoring.

## Further Information and Opportunity to Discuss Our Submission

144. Should the Ministry for the Environment require clarification of the submission from Hamilton City Council, or additional information, please contact Cathy Kopeke (Sustainability and Climate Change Senior Advisor), email [cathy.kopeke@hcc.govt.nz](mailto:cathy.kopeke@hcc.govt.nz) in the first instance.
145. **Hamilton City Council would welcome the opportunity to discuss the content of our submission in more detail with the Ministry for the Environment.**

Yours faithfully



**Lance Vervoort**  
**CHIEF EXECUTIVE**

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