

3 June 2022

National Adaptation Plan team
Ministry for the Environment

VIA EMAIL: adaptation@mfe.govt.nz

Dear National Adaptation Plan team

SUBMISSION ON DRAFT NATIONAL ADAPTATION PLAN ('NAP')

Thank you for the opportunity to provide feedback on the draft NAP.

The Hawke's Bay Regional Council ('HBRC') has strong affiliations and memberships with the following sector representative groups. We understand each of these groups are also intending on making submissions.

- Te Uru Kahika
- Taituara
- Local Government New Zealand.

1. Opening comment

1.1 We welcome the release of the first draft NAP. It is a great first start with a huge effort and coordination from across many government departments. We sincerely hope that degree of coordination is ongoing into the implementation phases following finalisation of the first NAP.

2. NAP objectives

- 2.1 The NAP's objectives are generally sound and supported. They emphasise that adaptation to climate change is no one single entity's responsibility, but that it is on all of us.
- 2.2 Many of the system-wide objectives and actions are fundamental to enabling various parties (including local government) to play their respective parts in climate adaptation and resilient communities. There needs to be a sense of urgency across those system-wide actions. Many of those actions can only be advanced by Government (i.e. via legislation).
- 2.3 While there appears to have been good coordination in weaving multiple objectives together into the NAP, a number of the actions infer that those threads (single-led government departments) are to implement their own adaptation strategies.¹ There are risks of those actions becoming disconnected from efforts of others, undermining the great efforts in coordinating preparation of the NAP.
- 2.4 A key pillar of adaptation that seems to be missing from the NAP is urgency to resolve a framework for adaptation funding and apportionment of costs.

3. Partnering with local government

3.1 The draft NAP highlights the key role of local government ("on the front line") in climate change adaptation, yet the objectives and associated workstreams appear to be Crown-centric and downplay the crucial front-line role of local councils.

¹ E.g. Infrastructure Commission developing a risk assessment model, DOC implementing their adaptation action plan (p45 of draft NAP) and Waka Kotahi developing a new adaptation plan.

- 3.2 HBRC is involved in a number of successful recent projects in partnership with government departments, particularly several of the 'Jobs For Nature' and 'Sustainable Hill Country Erosion Programme' initiatives to name a few.
- 3.3 We think that the NAP must recognise local government as 'partners' in adaptation because councils are uniquely placed (in our communities) and with statutory functions (current and emerging), plus associated accountabilities. However, no two communities are the same. Capacity and capability for adaptation are highly variable, so actions in the NAP are needed to support changes in human behaviour and transition.
- 3.4 On 26 June 2019, HBRC declared a climate emergency. That declaration was by no means the start of our actions for adapting to a changing climate. But the declaration was instrumental in further driving the ethos that "climate change is at the heart of everything we do." This is no better exhibited than in HBRC's *'Strategic Outcomes, Goals and Actions'* (see Attachment 1).
- 3.5 In February 2020, a preliminary stocktake of HBRC's [then] projects relating to action on climate change was prepared (see Attachment 2). Although now two years on, that stocktake clearly illustrates the range and depth of actions that HBRC (as one regional council) is leading in relation to climate action in Hawke's Bay. We welcome further opportunities to partner with Crown entities in aligning our common objectives for climate action.

4. NAP workstreams and priorities

- 4.1 We support the NAP's actions that underscore the importance of tackling some of the biggest climate change adaptation challenges in Hawke's Bay such as:
 - flooding
 - water security
 - coastal erosion and inundation and
 - further loss of biodiversity, including terrestrial, aquatic and marine biodiversity.
- 4.2 In Hawke's Bay, we anticipate a drier warmer climate, placing pressure on already finite freshwater resources for human use and also the environment's intrinsic needs. We also anticipate more intense storms and rainfall. We suggest the NAP should explicitly reference relevant actions in terms of:
 - limited and insufficient water AND
 - when there is too much water in some places (i.e. flooding, which is NZ's number one climate-change-induced natural hazard).
- 4.3 Central government co-investment in flood protection schemes deserves priority attention, but the draft NAP makes little reference to this need. We have already seen the significant impacts that floods can have on the social and economic wellbeing of people, businesses and communities. Limitations on water availability will also pose significant challenges to social and economic wellbeing of many in our region. Those extreme wet and extreme dry conditions will also exacerbate stressors on biophysical systems that may not have capacity to adapt swiftly to keep pace with climate-induced changes to habitats etc.
- 4.4 An MPI-led action to implement a Water Availability and Security programme² is supported, but we would welcome more urgency in its mobilisation. The NAP does not appear to feature a commensurate water security-related action in terms of urban and non-primary production water needs.
- 4.5 The NAP as drafted generally does not appear to clearly articulate priorities by hazard/risk type. The closest it gets is by tagging the actions with a timeframe for action. Few of the NAP's actions are 'tagged' or explicit in any way about which type(s) of hazard the action may be targeting in particular.

² Refer page 46 of draft NAP.

- 4.6 The draft NAP helpfully records a number of the Government’s “supporting actions” against each of the objectives. An overarching theme in the NAP should be that adaptation actions align or seek to maximise synergies with initiatives tackling other environmental challenges. Indeed, this is how many of our own Strategic Outcomes, Goals and Actions were configured. For example:
- projects enhancing some of our major flood schemes are also striving for good biodiversity outcomes and healthy rivers
 - adaptation to impacts of flooding can also help address challenges of sedimentation in New Zealand’s rivers, lakes, wetlands, estuaries and our sensitive marine ecosystems.
- 4.7 We also consider that the emissions impact of adaptation actions should also be considered in solutions. To tackle climate change challenges on multiple fronts, it is critical that the NAP joins dots with the recently released Emissions Reduction Plan now in in future editions of respective plans.

5. Managed retreat

- 5.1 HBRC, alongside Hastings District Council, Napier City Council and three partnering Post-Settlement Governance Entities³, have been at New Zealand’s leading edge of practice and challenges regarding managed retreat. Those efforts were briefly mentioned on page 38 of the draft NAP as a case study regarding the Clifton to Tangoio Coastal Hazards Management Strategy 2120 project.⁴ In 2020, we partnered with MFE to write up our [then] key experiences of challenges and barriers emerging from that project.
- 5.2 That case study recorded three key challenges (plus a number of other challenges and also some successes):
- Key challenge 1: core responsibilities for adaptation are ambiguous, and in some cases, featuring overlapping local government functions drawn up over three decades ago.
- Key challenge 2: tools and mechanisms to manage current and future hazards are limited or inefficient
- Key challenge 3: there is a lack of agreed approach and principles for sharing costs of works.
- 5.3 The draft NAP does take some steps towards breaking down these key challenges. But much more action is still required, with urgency, so we can overcome those key challenges.
- 5.4 Managed retreat has been recommended as the preferred long-term option in Clifton, Haumoana, and East Clive by the community panels involved in developing the long-term strategy. In other units, managed retreat is the primary alternative to the proposed interventions and represents the eventual outcome if dictated by future environmental conditions. While there are some New Zealand examples of managed retreat, each case has been bespoke and unique. This leaves a range of significant questions that do not have nationally established answers, such as who pays to implement managed retreat, what does it mean for affected property owners, how it is achieved at scale, and how much it costs.
- 5.5 The lack of clarity on what managed retreat actually is, and how much it costs, makes it difficult both to understand what is being recommended in Clifton, Haumoana, and East Clive, and to sensibly compare the recommended pathways with planned retreat as an alternative response. A specific ‘managed retreat’ workstream in the Strategy Project was established in response to these uncertainties. The Project team commissioned a report from Tonkin and Taylor Limited to explore what retreat might look like in Hawke’s Bay as an alternative to the recommended pathways. In other words, what would need to be retreated, by when, and at what cost, if

³ Heretaunga Tamatea Settlement Trust, Mana Ahuriri Trust and Maungaharuru-Tangitu Trust.

⁴ More information about this project is online at www.hbcoast.co.nz

nothing else was done to increase resilience to coastal hazards. That report is to be presented to the Clifton to Tangoio Coastal Hazards Strategy Joint Committee meeting on 3 June 2022.

- 5.6 Due to tight timeframes for feedback, our submission does not dive into the matter of managed retreat and our real-world experiences. We would welcome the opportunity to discuss those experiences with relevant Crown officials over the coming months, as steps are taken to shape up the Government's options and preferred approach(es) for managed retreat in legislation, systems and institutional arrangements.

Yours sincerely



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Attachments

1. HBRC's Strategic Outcomes, Goals and Actions (extract from HBRC's Strategic Plan 2020-25, adopted June 2020)
2. Stocktake of climate-related actions by HBRC (as at February 2020)

Our Strategic Outcomes, Goals and Actions

	WATER	LAND
PRIORITY AREA	Water quality, safety and climate-resilient security. Te kounga o te wai, te haumarutanga me te mārohirohi ā-āhuarangi o te whakamarutanga.	Climate-smart and sustainable land use. Kia koi, kia toitū hoki te whakamahinga o te whenua.
WHY IT'S A PRIORITY	Water is a life-giving, life-supporting taonga, it must be carefully managed for the region to prosper and provide a high standard of living. Water quality is essential for abundant, healthy aquatic life.	Farmers and growers are the primary stewards of the region's natural resources - only when they succeed can HBRC and the region succeed.
CLIMATE CHANGE IMPACTS	Water will become more scarce as demand continues to grow and supply is less certain resulting in increasing frequency of water shortages and variability in river flows.	Climate change impacts land use and productive systems which must adapt to the challenges posed such as increased rainfall intensity impacting on erosion and sediment loss, drier and warmer summers, and changing growing conditions for food production.
STRATEGIC OUTCOME	Aquatic ecosystems are protected and enhanced for all to safely enjoy. Water use is prioritised so that all users have sufficient water available to meet their needs within sustainable limits. The kaitiakitanga role of Tāngata Whenua and their whakapapa and cultural connection with water are recognised and provided for. Groundwater is protected to enable the provision of safe and secure supplies of drinking water.	Hawke's Bay farmers and growers are thriving and maximising returns from resilient farming systems through smart, sustainable land use.

BIODIVERSITY



Healthy, functioning and climate-resilient biodiversity.

Kia ora, kia āhei, kia mārohirohi ā-āhuarangi hoki te rerenga rauropi.

Healthy, functioning ecosystems - from our mountains to sea ki uta ki tai - underpin the vitality of our region. This includes habitat restoration alongside plant and animal pest control, and attention to the sensitive coastal marine environment.

With many of our lowland ecosystems reduced to small, fragmented remnants with poor connectivity they are particularly vulnerable to the effects of climate change such as drought and heavy rainfall. This includes all the biodiversity that lives within them.

Working together, Hawke's Bay's biodiversity is enhanced, healthy and functioning.
Source: HB Biodiversity Strategy, 2015-2050
Agricultural and environmental pests are managed and eradicated through the Regional Pest Management Plan.

INFRASTRUCTURE & SERVICES



Sustainable and climate-resilient services and infrastructure.

Kia toitū, kia mārohirohi ā-āhuarangi hoki ngā ratonga me ngā hanganga ā-whare.

High performing regional infrastructure enables the region's natural and human resources to deliver goods and services that underpin the prosperity and wellbeing of the Hawke's Bay community.

The climate assumptions that underpin our infrastructure investments and decisions are changing rapidly - we must ensure our assets and services are future-proofed for climate change impacts.

The region has resilient physical, community and business infrastructure to unlock potential growth and prosperity from our natural resource base
Source: Matariki HB Regional Economic Development Strategy and Action Plan 2016

PRIORITY AREA

WHY IT'S A PRIORITY

CLIMATE CHANGE IMPACTS

STRATEGIC OUTCOME

WATER

PRIORITY AREA

Water quality, safety and climate-resilient security.

Te kounga o te wai, te haumarutanga me te mārohirohi ā-āhuarangi o te whakamarutanga.

STRATEGIC GOAL (outcome measure)

- By 2025, plans for all catchments/ waterbodies are notified.
- By 2025, Tāngata Whenua values for all catchments are identified and embedded in the Regional Resource Management Plan.
- By 2025, all aquifers, lakes and rivers have community-agreed quantity and quality limits in force.
- By 2025, cultural monitoring tools are in-use in all catchments.
- By 2030, all popular Hawke's Bay swimming sites are swimmable 80% of the time, and 90% of the time by 2040.
- By 2050, there is an increasing trend in the life-supporting capacity of all of the region's degraded rivers and major streams.
- By 2030, Hawke's Bay has environmentally sustainable, harvestable water identified and stored or plans to be stored if required.

OBJECTIVE (Intermediate outcome)

Land use is managed to ensure pathogens and contaminants are being reduced, and water is being allocated sustainably to highest value use.

LAND

Climate-smart and sustainable land use.

Kia koi, kia toitū hoki te whakamahinga o te whenua.

- By 2025, stock is excluded from all flowing permanent and intermittent rivers/ creeks, lakes and wetlands, and at least 30% are fenced and planted to filter contaminants.
- By 2025, Land Use Suitability information is available to all land owners to inform smarter land use.
- By 2025, all farms, orchards and vineyards operate under a Farm Environment Management Plan or an independently audited industry best-practice framework.
- By 2030, all land-users in critical source areas have phosphorus management plans being implemented, with at least 50% of highly erodible land treated with soil conservation plantings.
- By 2025, catchment management plans are established to target improvements on land that lead to water quality improvements.
- By 2050, all highly erodible land is under tree cover.
- By 2050, there are 50% less contaminants from urban and rural environments into receiving waterbodies.

Hawke's Bay farmers and growers understand their environmental impacts, what they can do to reduce these, and are implementing good management practice on-farm.

BIODIVERSITY

Healthy, functioning and climate-resilient biodiversity.

Kia ora, kia āhei, kia mārohirohi ā-āhuarangi hoki te rerenga rauropi.

- By 2020, regional priority locations for ecosystem restoration - including in the coastal marine area - have been identified.
- By 2030, key species and habitat (sites) are prioritised and under active restoration. *Source: HB Biodiversity Strategy, 2015-2050 and Action Plan 2017-2020*
- By 2050, a full range of indigenous habitats and ecosystems, and abundance and distributions of taonga species are maintained and increased in every catchment in Hawke's Bay. *Source: HB Biodiversity Strategy, 2015-2050 and Action Plan 2017-2020.*
- By 2050, Hawke's Bay is predator free in line with NZ 2050 target. *Source: PF2050*

Strong knowledge of indigenous species, ecosystems and habitats is shared, informing joint prioritisation and active collaborative management.

Hawke's Bay has a comprehensive regional network of predator control programmes on land.

Growing knowledge of the coastal marine environment, and associated pressures and impacts is informing active management.

INFRASTRUCTURE & SERVICES

Sustainable and climate-resilient services and infrastructure.

Kia toitū, kia mārohirohi ā-āhuarangi hoki ngā ratonga me ngā hanganga ā-whare.

- By 2025, regional air quality consistently meets World Health Organisation guidelines.
- By 2025, the Coastal Hazards Joint Committee is implementing its strategy to manage coastal hazards in Clifton to Tangoio and by 2040 for the rest of the region to adapt to foreseeable climate change risks to coastal communities out to 2100.
- By 2023, the Napier Port is future-proofed with the addition of a new wharf with supporting land transport infrastructure.
- By 2030, flood risk is being managed to adapt to foreseeable climate change risks out to 2100.
- By 2025, HBRC is carbon zero and plays a leadership role in the region's goal of net zero greenhouse gases by 2050.
- From 2020, unplanned urban development avoids highly productive land.

Investment in critical enabling infrastructure is being facilitated in a timely manner through strategic planning, capital raising and accurate pricing for climate change impacts.

PRIORITY AREA

STRATEGIC GOAL
(outcome measure)

OBJECTIVE
(Intermediate outcome)

Attachment 2

Indicative HBRC Climate Action Plan – February 2020

ACTION	Time
A Framework <i>Identify, establish & maintain the resources, systems & data needed to address climate change risks and vulnerabilities within Hawke's Bay</i>	
A.1 Identify & assess climate change risks & vulnerabilities: <ul style="list-style-type: none"> • Improve understanding of Hawke's Bay risks & impacts <ul style="list-style-type: none"> ○ Update models & seasonal forecasts with southern hemisphere data ○ <i>Stocktake of risk knowledge & analyses</i> ○ Undertake scenario modelling & resilience studies, including for water management ○ Flood risk assessments ○ Natural hazard risk assessments ○ <i>Matauranga Maori perspective</i> • <i>Benchmark community awareness, issues, priorities & responses [NB 2019 survey included climate change questions]</i> 	2020 2020 Ongoing Ongoing 2020-21 2020, 2-yearly
A.2 Identify resources & opportunities for mitigation & adaptation: <ul style="list-style-type: none"> • Consider climate change in making HBRC decisions • Review proposed Annual Plan projects re climate change • Develop water security programme • Identify Future Farming research initiatives • Undertake 3-D Aquifer mapping of key aquifers 	Ongoing 2020 2020 2019 2020
A.3 Develop an agreed regional path to address climate change: <ul style="list-style-type: none"> • <i>Develop a Strategy & living Climate Action Plan</i> • Update Transportation plans & strategies (e.g. land transport management, cycling etc) • Continue to develop CDEM community-response plans • Review of RPS, & rolling program of regional plan changes • Update Heretaunga Plains Urban Development Strategy • Progress Clifton – Tangoio Coastal Hazards Strategy 2120 • Review flood control & drainage system levels of service 	2020 & ongoing At review Ongoing Ongoing With RPS review Ongoing 2020-2021
A.4 Monitor & evaluate progress: <ul style="list-style-type: none"> • Air & regional greenhouse gas emissions inventories • Input to national climate change risk & response monitoring • Use Annual Report to highlight key corporate results • Make quality data available 	2020, 5-yearly As requested Annually Ongoing
B Relationship <i>Identify, establish & maintain relationships with the many parties that are affected by, and may help address, climate change</i>	
B.1 Establish climate change regional governance: <ul style="list-style-type: none"> • Establish HBRC preliminary working group • Establish interim governance, preferably with TAs & iwi • Establish longer term governance with regional partners Establish technical advisory panel	2020 2020 2021
B.2 Engage with businesses, communities & iwi to respond to climate change: <ul style="list-style-type: none"> • Co-host preliminary meeting with 3-R • Hold 2 x Youth Fora through Enviroschools • Use LTP preliminary consultation to discuss issues & opportunities • <i>Hold a Hawke's Bay Climate Conference</i> • Align with ongoing LTP process to develop action proposals • Use LTP consultation to confirm Climate Action Plan • Business Hub services 	Nov 2019 1 st half 2020 April-May 2020 Mid-late 2020 Sept 2020 Apr-Jun 2021

ACTION	Time
<ul style="list-style-type: none"> • Future Farming initiative • Open data initiatives (e.g LAWA, community science) 	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
<p>B.3 Leverage resources:</p> <ul style="list-style-type: none"> • Build on existing co-funding projects e.g. Hawke's Bay Biodiversity Forum; Heatsmart • Partner with relevant parties e.g. PSGEs, TAs, DOC, NIWA etc • <i>Establish community contestable fund</i> 	<p>Ongoing</p> <p>As relevant</p>
<p>B.4 Communicate information & progress:</p> <ul style="list-style-type: none"> • Refresh the HBRC website, reflecting urgency of crisis • <i>Hold a Hawke's Bay Climate Conference</i> • <i>Create a new Climate Crisis Hawke's Bay portal</i> 	<p>2019</p> <p>Mid-late 2020</p> <p>2020</p>
<p>B.5 Influence behaviour change:</p> <ul style="list-style-type: none"> • <i>Develop, implement & monitor a behaviour change marketing strategy</i> 	<p>2020-21</p>
<p>B.6 Engage with central government through:</p> <ul style="list-style-type: none"> • Direct communication • LGNZ • Submission processes on proposed legislation 	<p>Ongoing</p> <p>Ongoing</p> <p>As relevant</p>

ACTION	Time
<p>C Action <i>Address climate change risks & vulnerabilities</i></p>	
<p>C.1 Hawke's Bay Regional Council: Leading by example Mitigation:</p> <ul style="list-style-type: none"> • Measure corporate carbon footprint • Monitor & report energy use in buildings • Move to e-vehicles, e-bikes • Incentivise use of public transport by staff • Travel choices: <ul style="list-style-type: none"> ○ Use online meetings where possible ○ Offset air travel emissions • Implement Ethical Investment Policy (no fossil fuels) • Waste management (Reduce, reuse, recycle) • HBRC agenda papers online • HBRC meetings livestreamed (YouTube, facebook) <p>Adaptation:</p> <ul style="list-style-type: none"> • Locate new buildings & services away from risk areas (Guppy Rd) 	<p>Annual</p> <p>Monthly, annual</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
<p>C.2 Region-wide Activities: Mitigation:</p> <ul style="list-style-type: none"> • Administer 1 Billion Tree/Right Tree Right Place programme • Administer Heatsmart home insulation & heating subsidy • Administer subsidised passenger transport • Encourage & support e-vehicle infrastructure • Manage HBRC forests <p>Adaptation:</p> <ul style="list-style-type: none"> • Natural resources management: <ul style="list-style-type: none"> ○ Develop & apply the water allocation calculator 	
<p>C.3 Northern Activities Mitigation:</p> <ul style="list-style-type: none"> • Reduce hill country erosion 	

ACTION	Time
<ul style="list-style-type: none"> • Lake Whakaki hot spot Adaptation: <ul style="list-style-type: none"> • 	
C.4 Central Activities Mitigation: <ul style="list-style-type: none"> • Lake Tutira hotspot • Ahuriri hot spot • Construct Bayview-Whirinaki Cycleway • Reduce hill country erosion Adaptation: <ul style="list-style-type: none"> • Implement Clifton Tangoio Coastal Strategy: <ul style="list-style-type: none"> ○ Westshore coastal works ○ Tangoio? • Construct Awanui stopbank • Support Te Tua augmentation scheme • Review Napier Stream Levels of Service 	
C.5 Southern Activities Mitigation: <ul style="list-style-type: none"> • Lake Whatuma hot spot • Reduce hill country erosion Adaptation: <ul style="list-style-type: none"> • 	