

21 November 2016

Frances Sullivan
Local Government New Zealand
PO Box 1214
WELLINGTON 6140

Dear Ms Sullivan

Re: Christchurch City Council feedback on the draft LGNZ 2050: Local Government Position on Climate Change

1.0 Introduction

The Christchurch City Council (the Council) welcomes the opportunity to provide feedback on the draft LGNZ 2050: Local Government Position on Climate Change (draft position statement).

The Council generally supports the draft position statement and welcomes the publication of a consistent final response by LGNZ in December 2016, and the opportunity for advocacy on a priority matter facing local government.

The Council recognises the important role of cities and is committed to improving its contribution to adaptation and mitigation of the effects of climate change. This commitment is expressed in Council documents including the Climate Smart Strategy 2010-2025 which sets out the direction for the community and Council actions that respond to issues and harness opportunities presented by climate change. The Resilient Greater Christchurch Plan 2016 demonstrates the commitment of the local government partners (Christchurch City Council, Selwyn District Council, Waimakariri District Council and Environment Canterbury) to managing the effects of climate change. As a result of the Canterbury earthquake sequence, adaptation and mitigation has become a matter of urgency for Greater Christchurch, particularly for our coastal settlements.

2.0 General comments

The Council supports and agrees with the structure of the draft position statement, which clearly outlines the five '*Local government will ...*' statements that local government commits to. These are complemented by six '*Local government seeks ...*' statements to support the local government contribution to the shared vision of a prosperous New Zealand. The opportunities identified under '*Advocacy for Change*' highlight the key opportunities for other sectors, including central government, that are essential to support local government and if achieved will make substantial gains in local government role of adaptation and mitigation.

LGNZ's development of a position statement is timely in respect of the updated guidance for local government on coastal hazards and climate change, expected to be released by the Ministry for the Environment later this year.

It is suggested that the draft position statement could be strengthened with the addition of specific examples to clarify and support some statements such as the reference to 'resource scarcity' and 'innovative technological practices'. We assume that these two examples refer respectively to water scarcity and technology such as pressure sewers for areas of high groundwater and flood proofing buildings.

Section '*Why local government?*' (page 1) includes a discussion on emission reduction efforts and local government's role in this. A useful addition to this section would be a brief discussion on petroleum exploration and extraction. The Council has recently submitted to the Ministry of Business, Innovation and Employment on the Proposed Block Offer 2017 and part of the submission addresses

climate change considerations. The Council questions the necessity and appropriateness of continued exploitation of remaining petroleum reserves in light of the contribution of its impacts on climate change.

Christchurch's economic prosperity relies on our environment and the primary production it supports, such as farming and forestry. Local government has an important role managing the location and type of primary industry, and ultimately the associated risks and opportunities. While the risks and opportunities will differ significantly across New Zealand and over time, a shared local government vision would benefit local government organisations. Further discussion in this matter in section '*Why local government?*' (page 1) would be a useful addition to the position statement.

The key aspects of the draft position statement the Council supports are:

- *Local government seeks clarification on where fiscal responsibility lies for adaptation (page 5)*

The Council supports this opportunity which is essential if managed retreat and adaptive pathways to realigning coastal settlements are to be viable options for communities. Alongside the social and political challenges of such policies are the inevitable questions of 'who pays', how do we account for public vs private benefits, and how do we take into account intergenerational costs.

This section finishes with the sentence:

"These decisions will have repercussions for all communities and, therefore need to be considered before the effects of climate change are felt."

We would suggest amending this to read:

"... need to be considered as a matter of urgency as the effects of climate change are already being felt in the form of increased flooding and exacerbated erosion on our coasts."

- *Local government seeks a national campaign to raise awareness of climate change (page 5)*

The Council strongly supports this opportunity and the need for Central government agencies to take the lead in a co-ordinated manner to raise awareness of climate change, improve risk literacy and develop a shared platform of knowledge and understanding to start to embed change. Having this conversation at a national level is essential to assist with conversations at the local level.

- *Local government seeks amendments to the building code to mitigate emissions through energy efficiency (page 5)*

The Council supports this opportunity. While the Council runs successful energy efficiency programmes it recently proposed to introduce energy efficiency rules as part of the Replacement Christchurch District Plan. Such regulation was considered inappropriate by the Independent Hearings Panel, preferring the Building Act 2004 as the best statutory vehicle if regulatory intervention was to be pursued and commenting that it was a national issue rather than Christchurch-specific¹.

- *Local government seeks a clear mandate to address climate change (page 6)*

The Council strongly supports this statement. Through its work on assessing coastal hazards and the impact of climate change on the risk from coastal erosion and inundation, the Council has

¹ Independent Hearings Panel, Christchurch Replacement District Plan, Decision 10: Residential (part), paragraph 356, page 97

been questioned by the community on where the responsibility lies, particularly with respect to the adoption of climate change scenarios.

3.0 Specific comments

Specific comments on recommended changes are outlined below using the headings in the draft position statement:

- *Why local government? (page 2)*

The first and second bullet points under paragraph 3 on page 2 need to be combined into a single sentence.

- *Our commitment (page 3)*

While the Council supports the commitments identified and recognises that this is a position statement to guide future work programmes where specifics will be expanded on, it questions whether they are sufficiently directive enough to fully understand the impacts. This includes the clarity in the language used. For example, in relation to item 3 it is unclear as to how this could be interpreted in practice. Is it concerned with whole of lifecycle project reporting? Or about future scenario testing?

- *Advocacy for change (page 5)*

It is unclear as to whether 'Advocacy for change' is a separate heading to the 'Local government seeks ...' statements below it or whether it is the heading under which these statements sit. It has been assumed to be the latter and it is suggested that the headings be numbered and a lead-in paragraph, similar to the one outlining the five opportunity areas under 'Our commitment ...', be added for clarification.

- *Local government seeks co-investment with central government to support co-investment in low carbon, climate resilient infrastructure (page 6)*

Typographic error in title. The title should read "... in low carbon ...".

4.0 Concluding comments

The Council again thanks LGNZ for the opportunity to provide feedback on the draft Local Government Position on Climate Change.

If you require clarification on the points raised, or additional information, please contact Helen Beaumont, Head of Strategic Policy, 03 941 5190 or helen.beaumont@ccc.govt.nz.

Yours faithfully



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Hon. Lianne Dalziel
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