

Feedback

Submission number	Do you have any feedback on the Coastal Adaptation Framework?	Do you have any specific feedback on the proposed guiding principles? Have we missed anything?	Is there anything you'd like to tell us about our proposed engagement and decision-making process?	Any further comments	Name
43634	<p>Waitai Coastal Burwood Community Board</p> <p>Do you have any feedback on the Coastal Adaptation Framework? The Board thanks the organisation for the extension to submit submissions/feedback – this has assisted us to take more time to gather feedback from our communities. The framework is a good start – it is written in plain English and easily understood. However, the Board has some concerns about how quickly the framework will be developed once underway. Feedback from within our communities is that the submission process was rushed, and the process for establishing Panels is moving too quickly. The future impacts of climate change are not certain, and it may take decades until we get a better idea of this through accurate monitoring.</p> <p>Do you have any specific feedback on the proposed guiding principles? Have we missed anything? Principle 2: Develop local plans for local communities and environment – this is a sound idea, but is practically difficult without having a range of measurable data about what is happening with regard to accretion, erosion, sea level rise, ground water rise and land settlement. We need frequent data gathering and monitoring, and this needs to be regularly shared with the public, and easily located on the Council website in a way that is easily understood. Principle 3: Focus on public assets that contribute to the health, safety and wellbeing of communities. This must provide for continued investment and maintenance of public assets such as Council owned assets, e.g. libraries, community centres, underground infrastructure, roads, bridges and stop banks. Principle 4: Be flexible and responsive – this is a key principle. We need to be able to update our risk assessment and planning based on incoming data, and to have a clear action plan when we see some of the triggers happening in our communities.</p> <p>Is there anything you'd like to tell us about our proposed engagement and decision-making process? Feedback on the Coastal Panel: <ul style="list-style-type: none"> • These should be selected from within the community. • The Panels (not just the STAGs) should have members who have expertise and can provide independent advice. E.g. Southshore example of Garry Teear. • The Board suggests that where there is a shortage of experts available for panels those experts could be available for more than one panel to meet the shortfall. • There needs to be representation by and reporting to the relevant Community Board/s. • Ideally members will have a high level of historical local knowledge. • The Panel will have a governance structure supported by the Council (much like is the case for Te Tira Kahikuhiku). • We do not see the need for wider city representation on the Panels. • Panel should determine its own Terms of Reference in conjunction with its Community Board. • The Community Board would like delegation to undertake the selection process for Panels within its Board area. • There must be a high level of transparency between Panels and STAGs. • The Board has a concern that the Banks Peninsula Panel process has begun before consultation period has been concluded. While we understand that this is a pilot, the Panel process should have waited until the consultation period was completed. • The Board would like to ensure that the Panels are fairly compensated for their time. • At the beginning of each new Panel process, the Board would like to see a lessons learned process undertaken with previous Panels. Engagement process: When the Council engages with our communities, it is important that this is done in a way that acknowledges the specific concerns that exist around these issues for our locals. It is their homes (their main asset) and their communities that are at most risk. There is well-documented low-level of underlying anxiety in our Wards that stems from our experiences during and after the earthquakes, loss and lack of action and this may be exacerbated by conversations that we need to have about sea level rise effects and how they will impact our people.</p>			Bebe Frayle	

	<p>The Board notes that there is a general mistrust of Council engagement and decision making within our Wards. It is important that this engagement process is undertaken with no predetermination, and that our communities are given a genuine opportunity to input into decisions affecting their future.</p> <p>Any further comments?</p> <p>It is imperative that adaptation planning be kept separate from earthquake legacy issues, which should be addressed as a matter of priority.</p>	
43344	<p>Waikura Linwood Central Heathcote Community Board</p> <p>Do you have any feedback on the Coastal Adaptation Framework?</p> <p>1.3 The Board thinks that it is critical that the issue of coastal adaptation is addressed, and the Board welcomes the opportunity to look at ‘how’ before the process begins.</p> <p>1.4 The Board strongly supports the community partnership approach proposed in this framework and believes it is essential that Council works mutually ‘with’ affected communities, so they feel included in a process that will affect their futures profoundly. It with this in mind, that the Linwood-Central-Heathcote Community Board has a number of items we would like to see addressed in the framework before it is adopted, so it is more relevant and accessible to all affected members of our communities.</p> <p>Do you have any specific feedback on the proposed guiding principles? Have we missed anything</p> <p>1. Uphold te Tiriti o Waitangi The Board endorses this principle as it stands.</p> <p>2. Develop local plans for local communities and environments The Board endorses this approach, because in its area of responsibility there are two quite different types of affected communities. Firstly, the coastal communities of Sumner, Redcliffs, Mt Pleasant, Ferrymead, and Heathcote for whom the need for Coastal Adaptation is more obvious. Secondly, the Board have the communities that lie in the Ōpāwaho and Ōtākaro River deltas, such as Wainoni, Avonside, Woolston, Linwood, Bromley and Brookhaven, for whom there may be little or no current understanding of the future issues residents will face from rising ground water and inundation. A number of these river delta communities face the complex issues of poverty such as insecurity of housing, a lack of food resilience and poor health. Whilst the framework alludes to working with the vulnerabilities facing communities, the Board would like to see the aspect of socioeconomic in equity emphasised in the framework.</p> <p>3. Focus on public assets that contribute to the health, safety and wellbeing of communities The Board suggests this principle be changed to read Focus on public and private assets that contribute to the health, safety and wellbeing of communities. The Board believes it is important that this process achieves buy-in from communities from the get-go. In its current form this principle needs defending, and could alienate community members who have significant investment in private assets; the outcome of which will be a waste of valuable time and energy arguing the point and damage to the relationships this process depends on. The change the Board is suggesting is inclusive whilst also placing an emphasis on the importance of community wellbeing throughout this process.</p> <p>4. Be flexible and responsive Under this principle the Board believes it is also important to emphasise the importance of future proofed planning and consenting processes, so that community members can be clear about potential pathways, and they too can take responsibility for being flexible and responsive. This addition would strengthen the ‘partnership’ aspect of the Coastal Adaptation process.</p> <p>5. Recognise inter-generational equity issues The Board endorses this principle as it stands.</p> <p>6. Prioritise natural and nature-based options The Board endorses this principle as it stands.</p> <p>7. Keep managed retreat on the table The Board suggests this principle be changed to read Keep all adaptation options on the table including managed retreat.</p> <p>As raised previously, it is important that this process achieves buy-in from communities from the get-go. Again, in its current form this principle needs defending, and could alienate community members who hold a greater priority for one or other adaptation option(s). The change the Board is suggesting is inclusive whilst also placing an emphasis on the importance of keeping managed retreat on the table.</p>	Alexandra Davids

	<p>Is there anything you'd like to tell us about our proposed engagement and decision-making process?</p> <p>The Board has a number of points to make about the engagement and decision-making process:</p> <ol style="list-style-type: none"> 1. They endorse the pathway for decision-making outlined. 2. The framework is conspicuously 'light' on the how the engagement process will be carried out, and believe it needs more detail to enable community members to see their part in the process; and not have some nebulous Council process imposed on them. 3. There are concerns about the language used. The process is called 'Coastal' Adaptation, and yet, in Linwood-Central-Heathcote, the majority of the affected communities do not live on the 'coast'; they live in estuarine and river delta environments. The name 'Coastal Panel is thus inaccurate and un-relatable for these communities, yet these are likely to be the hardest communities for this process to engage. Perhaps the panels might be named Community Panels, and the process itself Adaptation to Sea-Level rise. 4. There are concerns about timings in which this process will be carried out, given the large amount of awareness raising that will be required, and the importance of delivering this awareness raising sensitively. 5. In the document it emphasises the importance of championing the process, but the Board would like to see this changed to read both the process and the outcome. These interlink and coexist, especially with regards to community wellbeing and a mutual 'partnership' approach. 6. It is important that a mix of communities are identified in the first tranche of the engagement a decision-making process. The matter of public perception is important to create a strong sense of mutuality and partnership in the process, and a sense that the 'harder' or more 'problematic' communities are being left until last, will impact on the relationships this process relies on to be successful. <p>Any further comments?</p> <p>The Board would like some assurance that the process of deciding representation on community panels is in the hands of Rūnanga and communities, and is open and transparent.</p>				
44095	<p>Please refer to the attached submission made by the North Beach Residents Association.</p> <p><i>See attachment at end of table</i></p>			Josiah Thompson	
44024	<p>Southshore Residents' Association <i>See attachment at end of table</i></p> <p>We would like the opportunity to present and speak to this submission</p>			Sue Carbines	
44106	<p>South Brighton Residents' Association</p> <p><i>See attachment at end of table</i></p>	<p>Serious health and safety issues could result from the absence of regular measurements of E. coli in groundwater as a result of undetected earthquake damage to the horizontal infrastructure in South New Brighton. This should be made mandatory.</p>	<p>SBRA's experience shows that the process is seriously flawed.</p> <p>We have had no liaison person from the Community Board from several years. We have had no support from either the council or the community board when we have tried to draw attention to these issues. This is indicative of a cancel culture in local authorities in Christchurch.</p> <p>By way of further examples, you need only look at our previous submissions between 2013 and 2020 and the Council's response to them.</p>		Hugo Kristinsson
44077	<p>New Brighton Pier and Foreshore Society</p> <p><i>See attachment at end of table</i></p>			Stewart McNeice	
44036	<p>Brighton Observatory of Environment and Economics</p> <p><i>See attachment at end of table</i></p> <p>We would like to present both this submission and that on the Coastal Hazards Plan Change</p>			Simon Watts	
44316	<p>Christchurch Coastal Residents United (CCRU)</p> <p><i>See attachment at end of table</i></p>			Warwick Schaffer	

44229	<p>Avon-Heathcote Estuary Ihutai Trust <i>See attachment at end of table</i></p>	Kit Doudney
43964	<p>Next Generation – Youth Submission <i>See attachment at end of table</i></p>	Sian Carvell
43904	<p>Lyttelton Port of Christchurch <i>See attachment at end of table</i></p>	Gareth Taylor Lyttelton Port of Christchurch
43955	<p>Orion Do you have any feedback on the Coastal Adaptation Framework? 1. Orion support CCC’s adaption framework and the approach taken 2. Orion would like clarity on the Adaption Areas. The Adaption Areas on a map would help Orion in the operations and future works in these areas. Furthermore, we believe a timeline of the Adaption Area process should be provided in the Framework Document. This will allow stakeholders in these areas to manage and understand the different engagements within the respective Areas and plan future works. Do you have any specific feedback on the proposed guiding principles? Have we missed anything? 3. Orion generally agrees with the proposed guiding principles and their role to address the key areas of coastal hazard management and uncertainties. However, Orion believe a few key principles need further consideration as discussed below: Focus on public assets that contribute to the health, safety and wellbeing of communities 4. While we understand that focusing on public assets is vital for CCC, a key gap missing is in lifeline infrastructure that is provided by private owners. CCC needs to put further consideration into policy and decision making for the ability for private infrastructure and assets to operate and develop within this Framework Document. 5. Therefore, we believe changing the guiding principle to focus on all assets is beneficial to all parties affected: Focus on public assets that contribute to the health, safety and wellbeing of communities. Develop local plans for local communities and environments 6. Orion take proactive approaches on matters involving our community. We recognise the importance of our assets and infrastructure to the community within the Adaption Areas. It is unclear how infrastructure and industry providers (aside from CCC) can provide information into Adaptation Planning. 7. Orion respect that community must have an independent forum on the adaption planning process. however, we propose that there be a separate forum for industry and infrastructure should be considered to share input into decision making. 8. We believe an industry and infrastructure forum will provide further support and understanding to the community forum creating a better outcome. Keep managed retreat on the table 9. Orion understands the need to keep all option available with the uncertainties that involve coastal management. However, we would like it to be considered that not all activities can retreat. We provide infrastructure to communities and other infrastructure providers that may be unable to retreat. Therefore, we ask that this principle provide context into the types of activities in the Adaption Areas. We believe this should be clarified in the Framework Document. Is there anything you’d like to tell us about our proposed engagement and decision-making process? 10. Orion have a duty to provide electricity to our customers. We believe that there needs to be a clearer policy on infrastructure outlining the exceptions for maintenance, repair and new infrastructure in Activity Status control levels. 11. We ask that CCC provide a forum or platform for industry and infrastructure providers to offer input into adaption options and areas, as previously discussed. Any further comments? 12. Where does this framework and the policies from it sit in the statutory structure (e.g CDEM)? 13. Orion is open to discuss any matters raised in this submission with the Christchurch City Council</p>	Casey Carass Orion

43946	1	Federated Farmers <i>See attachment at end of table</i>			Eleanor Linscott
42149	Akaroa Civic Trust The framework appears to be well thought-out, with a variety of pathways possible in different Adaptation Areas. It is not clear from the documentation how members of each Coastal Panel will be appointed. Will they be nominated by relevant organisations and selected by local communities, or will they be council vetted appointments? It would also be helpful to know what the extent of each Adaption Area might be. Would the whole of Akaroa Harbour be considered to be a single Adaptation Area, or would areas be on a larger scale, such as the whole of Banks Peninsula?	Will the guiding principles be prioritised in any way, or will they be given equal weighting when recommendations from Coastal Panels are considered by the council? We notice that there is no mention of the importance of protecting the heritage values of an Adaptation Area in any of the principles, which is of concern to us as a civic trust.	While the drop-in session held in Akaroa was helpful in terms of learning something about the Coastal Adaption Framework, a formal presentation would have been very useful to gain an introduction to the entire project and its different components. It was only after reading the entire Coastal Adaption Framework that the individual conversations with council staff members begin to connect up. Combining a presentation with staff being available afterwards for conversations would be an effective way of communicating with local communities.	We are encouraged by the emphasis on involving local communities in the development of recommendations that are appropriate for the needs, aspirations and values of different communities. How does the council propose to ascertain those needs, aspirations and values? An adaptation plan for an area such as Akaroa Harbour would also need to consider how the unique heritage values of the area are protected for future generations to enjoy.	George Hook Akaroa Civic Trust
42317	Flourish Kia Puāwai Flourish Kia Puāwai is a social enterprise umbrella for innovative community and environmental wellbeing initiatives. Our purpose is to to raise awareness of the urgency to respond to Climate Breakdown and aid the transition to a regenerative society, through; - Educating and enabling wellbeing, resilient and environmentally friendly lifestyles of our individuals, whānau and communities - Creating innovative, holistic solutions and products to leverage sustainable, regenerative and environmental change - Promoting and collaborating with progressive organisations, businesses, government and	We are in general supportive of the proposed guiding principles. We would in particular like to see the Council place a strong emphasis on a) upholding Te Tiriti o Waitangi and the associated responsibilities in regard to rangatiratanga and engaging with manawhenua. b) Develop local plans for local communities and environments. We believe that each community has the right to input into decisions about their futures and contribute ideas borne from local knowledge and experience to bring about the best possible outcome. c) Recognise inter-generational equity issues and the concept that action may be needed now, to avoid shifting the financial burden of implementing adaptation pathways onto future generations. d) Prioritise natural and nature-based options, and ask Council to consider actions taken in the light of the fact that we are currently in the middle of mass extinction event brought about by human activity.	While the planning for this looks comprehensive we wish to make the following points. We note that the process of 'overall city wide engagement' is to take place for 6 months (presumably from the date of approval of this framework) and then another year will be spent on the specific community level consultations starting 'early 2022'. While respecting the need for the community to have appropriate input into this process we are also concerned that unnecessary delay in taking action on these important issues matters could be significantly detrimental to communities, individuals and natural habitats. We would note that given the current date it is now unlikely that community consultation will start in 'early 2022', and that it is more likely to be 'mid-2022' when this occurs, and that the process will consequently only be completed, and decisions arising from this will only happen in early to mid 2023. We would therefore ask the Council to consider running 2-3 community consultations at the same time to reduce the overall time this process will take.		Ian Burn Flourish Kia Puāwai

	<p>movements</p> <p>- Demonstrating through our work a commitment to Te Tiriti o Waitangi, social equity and social inclusion.</p> <p>Given our purposes we are interested in the work Council is doing around Coastal Adaptation and will make points regarding this in response to the following questions.</p> <p>Overall however there has been an impressive amount of quality work put into developing this policy and processes for engaging with the public about these issues. In particular the short YouTube videos were most useful. We appreciated viewing the overview video, and that you have started on specific videos for each of the specific consultation areas. The various maps and interactive tools relating to sea level rise and related issues are also useful.</p>		<p>We also note that the initial consultation is with Whakaraupō-Lyttelton Mt Herbert. Could you advise us why this area has been chosen first up when the amount of impact on this area is relatively small compared to other areas, notably New Brighton. We would ask you to consider bringing New Brighton further up the consultation order, as we believe there may be learnings from engaging with the interests and concerns of this larger community for other consultations, that will be lost if this is left till later.</p> <p>Relatedly while it is mentioned that 7 local communities will be consulted it is not obvious which communities these are. Please could this be clarified.</p>		
44236	<i>See attachment at end of table</i>				Richard Dalman
44232	<i>See attachment at end of table</i>				David East
44230	<i>See attachment at end of table</i>				Marion Smart
44227	<i>See attachment at end of table</i>				Kim Money
44110	<i>See attachment at end of table</i>				Brian Sandle
44091	I agree with the SSRA submission. Further, I object to any District Plan change or Coastal Adaptation work until the overdue Earthquake repair of estuary flood & erosion protection in Southshore/South New Brighton is completed.				Tim Roulston
44085	I agree with the SSRA submission. Further, I object to any District Plan change or Coastal Adaptation work until the overdue Earthquake repair of estuary flood & erosion protection in Southshore/South New Brighton is completed.				Alan Taylor
44084	I agree with the SSRA submission. Further, I object to any District Plan change or Coastal Adaptation work until the overdue Earthquake repair of estuary flood & erosion protection in Southshore/South New Brighton is completed.				Mavis Taylor
44083	I agree with the SSRA submission. Further, I object to any District Plan change or Coastal Adaptation work until the overdue Earthquake repair of estuary flood & erosion protection in Southshore/South New Brighton is completed.				Dulcie Brown
44082	I agree with the SSRA submission. Further, I object to any District Plan change or Coastal Adaptation work until the overdue Earthquake repair of estuary flood & erosion protection in Southshore/South New Brighton is completed.				Simon Brown

44100	<p>The background Coastal Hazards analysis by Tonkin and Taylor is too precautionary. We shouldn't be planning for the most extreme unlikely occurrences, we should be planning for realistic outcomes that are most likely to occur.</p> <p>Examples are:</p> <ul style="list-style-type: none"> - RCP 8.5 is included in the hazard assessment, however it is now internationally recognised that this is unlikely to occur. - The Coastal erosion values presented are much more severe than those in the NIWA Sediment budget report which states "At least up to 2120, the City shore sand budget should remain in surplus, and the shore should not begin to erode, except under the worst case RCP8.5 climate change scenario." <p>The Tonkin and Taylor report is not consistent with the NIWA, and this leads to lack of confidence in the Tonkin and Taylor report.</p> <p>Council appointed technical experts have made decisions on what the 50 year and 100 year sea level rise values should be without community input. The community should be involved in the decision making process for what levels of sea level rise we should be planning for. This has not occurred.</p> <p>Generally it appears the Coastal Hazards discussion this point has been largely undertaken without community input, which is unacceptable.</p> <p>The coastal hazards modelling does not appear to be benchmarked against reality. Ongoing monitoring of sea level rise and coastal erosion should be carried out by Council over the next 10 -15 years and the model predictions adjusted accordingly. It is not OK to make big decisions about the future of communities when the modelling</p>	<p>The community should be involved in deciding what the guiding principles are. These principles should be scrapped and the community consulted and what they want the principles to be. Remember the Council is here to serve the community!</p> <p>A key guiding principle that should be included "Put the wellbeing of people first."</p> <p>The focus on public assets only is disappointing. The council cannot just ignore private property and do nothing to protect it.</p> <p>Keeping managed retreat on the table should not be a guiding principle. It gives it priority over other strategies, and managed retreat should only be considered as a very last resort in extreme cases.</p> <p>Prioritisation of nature based options is OK if they can achieve the required outcome, however other options should be equally accessible when nature based options don't provide acceptable protection/outcomes.</p>	<p>Generally it appears the Coastal Hazards discussion this point has been largely undertaken without community input, which is unacceptable.</p> <p>The consultation period is too short considering the amount of background technical information to digest and potential significant impacts these decisions could have on people and communities.</p> <p>Further consultation with communities is needed on what they consider an acceptable risk and what levels of sea level rise we should plan for.</p> <p>There is a lack of trust of Council in the coastal communities in recent years, and with good reason as there are examples of poor treatment of residents, such as the appalling lack of action with the Southshore and South New Brighton estuary edge. This whole process reeks of consultation to tick a box, and that CCC already have their desired outcomes which they will push ahead with anyway. CCC need to regain the trust of coastal communities by showing they are listening to what we want and taking action accordingly.</p>	<p>I agree with and support the submissions of:</p> <ul style="list-style-type: none"> • Christchurch Coastal Residents United (CCRU) North Beach Residents Association Waimairi Beach Residents Association • Southshore Residents Association 	Josiah Thompson
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	has not been proven to be accurate yet.				
44081	Agree with emphasis on protect public not private assets. Whether adaptation or retreat, the burden must be on the individual, not the ratepayer. Anyone living in the coastal zone within the last 15 years is absolutely aware of the threat from climate change and the threat of coastal inundation.	The CCC needs to remain really reactive to land values in the coastal inundation zone. Because private insurance has been left to 'wield the stick', as house values drop this needs to have immediate effect on the RV adjoining properties, so that the CCC isn't left with a 'red-zone' situation when it comes to managed retreat - because affected properties will have a \$0 RV by then.	Please don't let the vocal minority lead the decision making.		Laurence Mote
44080	Boffa Miskell supports the Christchurch City Council's proposed coastal adaption framework. We recognise the value in setting out a clear process that works in partnership with mana whenua and potentially affected communities. We recognise that other important aspects have been considered in guiding the CAF, including local values, adaptation, intergenerational perspectives, and nature-based solutions.	<p>We support the framework's proposed guiding principles, particularly capturing and articulating local values. We suggest that early recognition and understanding of these values can:</p> <ol style="list-style-type: none"> 1. Contribute to a larger spatial strategy/vision for the short- and long-term future of the coastal communities. This could drive a collective purpose/aspiration across stakeholders and iwi partners. 2. Introduce a means to direct and prioritise responses based on combined values and risks (constraints and opportunities) 3. Assess the future coastal environment holistically in terms of future development and transitional landscapes and ecologies <p>We feel the strategy could benefit from integration across principles when delivering outcomes. Additionally, we believe there could be a firmer focus on interrelating coastal planning with other regional and district planning documentation i.e. what is happening landwards in terms of land use change and infrastructure planning to ensure horizontal integration across other planning strategies. The inclusion of an overarching strategy/vision, as discussed above, may assist in this process.</p> <p>We are interested to see more detail on how the framework will consider economics in its decision-making, including the mechanisms to incentivise necessary transitions in coastal environments. Presumably there will be broader stakeholders to consider in these discussions. Part of this will be to view this</p>	We consider integrating understanding of landscape, ecology and natural character values through the development of adaptive pathways is a necessary aspect of the decision-making process. In this respect, the framework currently appears more focused on risk and vulnerabilities to determine responses, then checking these against community objectives once defined. To this end we encourage the Council to work with the community to foster an understanding of values (landscape, social, cultural, economic, etc) as a means of encouraging benefit and action without first limiting responses to those which unduly focus on hazards. In addition, we recommend the use of visualisation modelling tools to clearly articulate understanding of values and opportunity as a key aspect of effective engagement.	Boffa Miskell welcomes ongoing opportunities to be involved in and contribute to adaptive outcomes within Christchurch's coastal environment in response to climate change and we would be happy to discuss any aspects of our submission.	Rhys Girvan

		<p>decision-making in line with the CCC recommendations and seeking equity in responses and outcomes, especially for Māori. We see historic and immediate equity as an issue that will need to be assessed, likely utilising the CC Adaptation Act, to consider equity more broadly than inter-generational costs.</p> <p>We support prioritizing natural and nature-based solutions as a key matter to preserve or restore natural character within these changing aspects of our coastal environments. To address this, we encourage further technical and community understanding of such opportunities. In some contexts, this may necessitate trial and error in the application of preferred options and complementary hybridised solutions. We also recognise that it is usually easier to integrate such measures proactively rather than reactionary. Facilitating ongoing research on such opportunities may therefore form the basis for implementing such adaptation pathways.</p>			
44067	<p><i>See attachment at end of table</i></p> <p>If there is an opportunity to speak to the submission I would like to be heard.</p>				Megan Roulston
44065	<p>I support the Southshore Residents Associations Submission.</p>				Carol Scott
44050	<p><i>See attachment at end of table</i></p>				Jan Burney

<p>44049</p>	<p>I think the Coastal Adaptation Framework is a robust piece of work. It is positive to see it build on work done in Southshore/South New Brighton as part of the earthquake legacy and climate change project, and also the work of the How Team. The document is easy to follow, the glossary is helpful, and the clarity about roles and responsibilities is useful. Having also looked at the Terms of Reference for the Coastal Panel, it is encouraging to see the level of involvement that the community will have in this adaptation work. Well done to the team putting this work together. I agree with the initial thoughts around the Framework.</p> <p>p.8 Options:</p> <p>Maintain: it would be helpful to add "community-led citizen science" to the list of options</p> <p>Retreat: it is positive to see options listed including buyouts, land swaps and leasebacks.</p> <p>p.9 Roles and responsibilities</p> <p>I would like to see greater obligations and responsibilities on conveyancing lawyers and real estate agents for ensuring buyers and sellers of private assets are well aware of the risks outlined in the LIM. Many people are not aware of the importance of the LIM and they should not be disadvantaged because of this.</p> <p>I think the Council should hold some responsibility for private assets that are held and managed by community 'not for profit' organisations when those assets are providing services to the community - for example marae,</p>	<p>I believe there is the need to include a new guiding principle about working actively with local communities. This is currently missing, and as recognised by the MfE Guidance and the Framework proposed, the community needs to be central to the Coastal Adaptation process. While this may be the intention of the second principle, currently the wording refers to developing local plans "for" the community. The subtle difference in words is quite significant.</p> <p>- I strongly support the first principle to "Uphold te Tiriti o Waitangi" and it is encouraging to see the Council working in partnership with mana whenua on this Coastal Adaptation work programme.</p> <p>- "Develop local plans WITH local communities and environments. As noted above, it is important to work "with" communities - working "for" communities sounds as if the Council already knows what the community wants.</p> <p>- "Focus on public assets....." - as noted in my submission earlier, I think the Council needs to expand its definition of public assets to facilities that may be owned and managed by 'not for profit' organisations. For example, public funds may be required to re-locate some of these facilities, which is appropriate if the facilities are being managed for the community.</p> <p>- "be flexible and responsive" - as with the other principles and throughout the document, it is slightly unclear who the "we" refers to. It is understood it means the Council. If so, this sounds too exclusive, noting that this work is being done in partnership with Papatipu Rūnanga and coastal communities. Reconsider the use of "we" in this and the other principles, and for transparency, use the term 'Council' where necessary.</p> <p>- I strongly support "recognise inter-generational equity issues"</p> <p>- the principle "keep managed retreat on the table" seems out of sync with the other principles, as it is an option, rather than a</p>	<p>Approach to adaptation planning</p> <p>I support the proposed engagement and decision-making process, including the Coastal Panel and its proposed membership. I support that there is at least two Papatipu Rūnanga representatives involved in the Coastal Panel. I think it will also be important for the panel members to have some Te Tiriti training so that they have a good understanding of the application of Te Tiriti in the work programme. The application and understanding of Te Tiriti is a responsibility of all members, not just the Papatipu Rūnanga members. It is also important that the Coastal Panel is well supported. It is difficult to represent a wide range of interests and the weight of that responsibility will require good psychosocial support for those involved. It is understood that their efforts will be remunerated, which is appropriate.</p> <p>I would like to request that the evaluation and lessons learnt reports from the Coastal Futures work in Southshore/South New Brighton is made available to the Panel. I strongly support workshops with the community, throughout the process, to ensure the issues and options are well informed by community knowledge, and to help with community understanding and 'ownership' of the issues and solutions. It is also important that the community is involved in the important step of determining the criteria by which decisions will be made. I would hope that community engagement will be at the 'collaborative' end of the IAP2 spectrum.</p> <p>I would like to see participatory evaluation techniques used throughout the process (not just at the end), to help ensure the work is on target and reaching all parts of the community. Agreeing evaluation criteria with the Coastal Panel, including criteria to measure community engagement, and undertaking regular low-key evaluations throughout the 18 month process will be important for learning lessons and improving as each Adaptation Area planning process is progressed.</p> <p>STAG - I think it will be important to have psychosocial technical expertise and social science climate experts on the STAG. Similarly, if Papatipu Rūnanga agree, the STAG should also include technical advice and mātauranga from a mana whenua perspective, which is additional to the</p>	<p>I commend the Council for taking a pro-active approach to Coastal Adaptation. I strongly recommend that this proposed process takes place PRIOR to making significant changes to the proposed Plan Change. This is because it is important that any rules in the district plan reflect an excellent community engagement process, which will not be possible via an RMA plan change process. The required Plan Change can be done via a "do minimum" approach until the outcomes of the Coastal Adaptation Framework have been decided. These issues are difficult and contentious and so require an excellent engagement process so that communities are left feeling empowered and on-board, rather than discouraged and frustrated. Unfortunately the RMA plan change process is unlikely to be able to fulfil the extent and depth of engagement required to meet that positive outcome.</p>	<p>Rachel Puentener</p>
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	<p>commun]ity halls and football clubs. In this case, most of the people responsible for looking after these facilities are volunteers, and they will need the support, skills and advice of the Council to manage the risks they may face. I would like to see this category of 'private asset owners' separated out and covered explicitly in the Coastal Adaptation Framework, as their situation is quite different to an individual or private company's assets.</p>	<p>principle. Is it more a principle about being honest, upfront and addressing the hard issues, that is the point being made here? Again, this proposed principle points to the importance of needing a specific principle about a community-centric engagement process.</p>	<p>involvement of Papatipu Rūnanga involvement in the Coastal Panel.</p> <p>I would hope and expect that Councillors will be confident in the recommendations coming from the Coastal Panel and not feel the need to make significant changes to the recommendations. Having some agreed processes around the Council decision making process would be helpful however, in case Council does decide to make last minute changes to recommendations. While it is recognised that the Council is the decision maker, to ensure any changes to recommendations are well worded as resolutions/decisions, and as a courtesy, it would be good practise to take them back to the Coastal Panel and Working Group to ensure the wording accurately reflects what is being decided and is practically able to be implemented. There is a risk that rushed, last minute changes to resolutions within the Council meeting could inadvertently undermine the significant effort and work by the Coastal Panel and community and be difficult for staff to implement.</p>		
44048	<p>CCC (working with ECan) need to ensure that this engagement is a collaborative consultation model is a genuine honest process that is not driven by predetermined bias and outcomes. Representation on hearing panels must be chosen by the local community and be at least 80% including Runanga. Southshore are not prepared to have the Coastal adaption process until completion of the Estuary Edge Repair, and the stormwater and drainage system at Southshore is adequate to prevent estuary water backflowing and causing flooding. Inequity in flood protection here at Southshore must be addressed with our community receiving flood protection that provides the same removal of risk and hazards as already provided to the Sumner to Ferrymead coastal and estuary edge suburbs.</p>	<p>The concept of adaptive planning is to spread the costs across time as and when it its needed. We disagree to any decisions that restrict investment until equity of protection is provided and a projected trigger point is agreed by community to be highly likely in the short term future out to 10 years. Solutions of modern structures that are designed to repair and grow coastal areas so they become more naturally resilient, as well as equity in the provision of hard structures must be included as options in the Coastal adaption framework and process.</p>	<p>Withholding information and not following through on agreed action are dishonourable actions that destroy trust. Staff absences from community meetings with fill in staff replacements who can not and will not answer questions or be able to explain changes in process are poor form that also destroy trust. Staff behaviour throughout this adaption process with communities and behind the scenes at council will hopefully succeed this time, in regaining the trust of communities.</p>	<p>Looking forward to honest and genuine community collaborative engagement and open discussion and sharing of proactive solutions.</p>	<p>Marie Graham</p>

44043	I fully agree with and support the submission of the southshore residents association. It represents my views.			There seems to be a bias from council towards coastal retreat and continued delay to Estuary edge repairs despite promises to remedy these issues.	Richard Griffiths
44033	<i>See attachment at end of table</i>				Jan & Tim Sintes
44012	The expectation is submissions and community concerns would be heard and actioned - but history and conversations thus far indicate a repeated history of CCC offering a gesture of community inclusion but actioning predetermined outcomes. As in ads soliciting interest in being part of the framework group before seeing and reflecting on submissions about the framework. As well, CCC have no sense of the depth of reach to community members the council has achieved in any concerned community.	No vision. There is no indication of CCC's vision of success. No indication of CCC's interest in the success of communities. Currently it seems to avoid future generations from the burden of costs by plans to place it squarely on the current community residents. Of the options proposed (and all are in line with the Coastal Policy Statement) - only one is noted as 'kept on the table' - Managed Retreat - what about the other options? I cannot see anything but predetermined intention when this is the verbiage used to Guide the Principals.	<p>Proposing engagement - great. Decision making process - shabby. Stating the use of documents, and a great deal of time was spent to form the engagement information - yet unwilling to engage on why newer information is not being used and unhappy when questioned. Engage - but not too thoroughly please, seems to be CCC's true wish. As well, a terribly short time of community presentations and submission time. Considering the high level of impact, importance to the city and each community involved, to rush a campaign through and only give a short time to reply indicates a lack of 'actual' engagement intent.</p> <p>Proposal to make up the Coastal Panel is skewed with more "other" than locals to the community. CCC say that is to balance perspective - but CCC have yet to share that many other communities (Not just coastal) will be affected by the climate changes and sea level rise - so these added members are not offering a perspective that is valid to the conversation. At this point their community is not on the chopping block. When attending a CCC presentation to a close-by neighbourhood, it was literally said out loud - 'your area is really not studied too much because you have a hard wall' !? Based on the location between definite places of impact - how could it not be important? Why is there not a greater level of trying together the areas for stronger realisations about risks overall?</p> <p>What is Youth? Is that an age? Is that a non-home owner? What is Youth equal to for council? Cannot find a definition for Youth in the literature.</p>	<p>Living in South Brighton it is difficult to engage without a strong level of frustration and - to an extent anger. CCC want the community to engage in a truly needed conversation on how we have a successful future with the climate facts now presenting - when they have neglected to finish a terribly done job from over 10 years ago. Even now South New Brighton is meant to smile about a further delayed repair to the estuary edge - but also take on the conversation about erosion as a risk. We are meant to trust CCC's intention to the community's well-being when it has quite blatantly turned its back on the community.</p> <p>Around the world communities have lived at the water's edge and over water. There are a myriad of clever, developing and already used methods to plan for and adapt for this. Living near Southshore I have seen lots of new and rebuild homes going in with several adaptations in play - where does this adaptation sit on the coming scale? Is this an example of CCC's ideal adaptation? There has not been an open conversation regarding this and yet the level of individual community member's participation to adapt has been high. How do we gage CCC intention and ability to act on behalf of us when communication to us is opaque?</p> <p>At this point I can not say I trust this process as earnest and open with all involved communities' well-being in mind.</p>	Letitia Morettini

43919	<p>To be genuine in this framework, CCC needs be agile and reflective of the results of the engagement. There has been much history of predetermined outcomes prior to engagement in the Southshore area. There appears a view that the CCC staff do trust the community to have enough balance within itself to make good and practical decisions. This is evident in the perceived need to have a large percentage of non residents on the panels. For this reason I believe the composition of the panels needs revision to be in anyway successful.</p>	<p>I have viewed and support the content of the submissions of the SSRA, CCRU and Boee</p>	<p>I have viewed and support the content of the submissions of the SSRA, CCRU and Boee</p> <p>In addition</p> <p>I do not see the need for wider city representation on the panels unless they have relevant or specific agreed expertise. The staff have indicated that outside representation is needed for balance. Do the CCC not think these communities can provide balance from within. Or is it that they do not think the community can possibly be trusted to have a balanced view. It has also been indicated that outside representation is needed as this will be a cost born by all rate payers. If this is of such importance, I would question how many coastal rate payers were specifically asked to be involved "for balance" in the decisions around Flockton basin or the millions spent on the flood mitigation in Haswell, or flood mitigation along our various rivers or port Hills hazards. All of which Coastal people contribute rates to. We wonder why coastal issues appear to be addressed by a different rule book .</p>	<ul style="list-style-type: none"> • Slow down the process- allow communities to catch up. • Allow communities to feedback, question, clarify and understand the foundational technical information before its use. • I do not see the need for wider city representation on the panels unless they have relevant or specific agreed expertise. • Input from the community on Stag members and outside Coastal panel members is vital. • Refine your Guiding principles, managed retreat is not appropriate in the guiding principles . While it is one of an number of options it does not appear to be mandated by the NZCPS other than as an option among others. 	<p>Karina Hay</p>
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43673	<p>Coastal Flooding – Feedback</p> <p>Leslie L J Griffiths,</p> <p>To: Katy McRae, Coastal Flooding Engagement Manager</p> <p>As the world’s population continues to increase and we keep on covering the land with buildings, roads, paths, etc, collecting storm and waste water from these developments, then channelling this water out to sea at an ever increasing rate, then surely we must be responsible for the resulting rise in sea levels.</p> <p>Not many years ago, the Christchurch City Council installed a pipe-line from the Bromley sewerage ponds out to sea in order to convey out treated waste water directly out to sea. This action was quickly followed by the Waimakariri Council. Christchurch only has a population of around 300,000 and every time we pull the chain, do the dishes, wash our clothes, shower, etc, the waste water ends up in the sea. What happens to City’s with millions of people doing the same thing?</p> <p>Then we have China building a massive military base in the South China Sea. Dubai built in the sea. Even our own Lyttelton Port Company has Cashin Quay built in the sea and even more recently the Port Company has built a 16 hectare container facility in the sea. What is happening around the world that we do not know about?</p> <p>In the last few years, developments in the north of Christchurch, some completed, others are ongoing, all put their storm water into the Styx River either directly or via the Kapatone Creek.</p> <ol style="list-style-type: none"> 1. Cavendish Road, ex-farm land now a retirement village. 2. Northwood Belfast, ex-orchard now a large housing estate. 3. Old orchard bounded by the Styx River, Main North Road and Radcliff Road presently under development as a Ryman Retirement complex. 4. Ex-Belfast Freezing Works land Blakes Road now has a commercial area much of which is completely sealed. Plus the two large stock holding paddocks are presently being developed for a massive housing development. 5. “Burlington” Prestons Road another retirement complex which when finished will most likely be the largest retirement complex in Christchurch. 6. Prestons Road/Lower Styx Road ex-farm land now a housing estate. 7. The Christchurch City Council has a purposely constructed well which pumps a consented 20 litres per second into the Kapatone Creek 24 hours, 7 days per week. This would be some of the most pristine drinking water you will find anywhere in the world, most of which flows out to sea. This well is situated in Northwood Boulevard Belfast. Nature never intended the Styx River to carry purposely collected storm water. Nature designed the Styx River to convey the storm water it collected via soakage from the land which is a much slower process than being purposely channelled into the river. <p>The Christchurch Drainage Board used to dredge the lower reaches of the Styx River as required.</p> <p>A number of years ago, the Drainage Board was dissolved and its functions were entrusted to the City Council, whose maintenance function of our rivers, creeks, etc, has been virtually non-existent apart from cutting weed hence the Styx River continually overflowing in its lower reaches.</p> <p>The Council’s answer to this problem is to declare the nearby land as ponding areas and carry on consenting more developments in the Styx River catchment of approximately 50 sq km when all that is required is that they do some real maintenance.</p> <p>When we next experience severe flooding form our over-flowing rivers, creeks, etc, it will no doubt be attributed to “Climate Change”. The Council already has a ready-made excuse for its lack of real maintenance.</p> <p>There is also developments at Chaneys Corner and Bridgend, no doubt the storm water will enter the Styx River at some point.</p>	Leslie L J Griffiths
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43231	<p>Adaptation to coastal hazards (except the 'Maintain' option) will require additional resources. There is no mention how climate change and especially the reduced availability of resources with high imbedded GHG content like concrete, steel, heavy transport etc will affect the ability to protect and/or accommodate.</p>	<p>The cost of adaptation is never mentioned. Any expenses that benefit mainly coastal communities must be transparent and equitable and supported by all Christchurch communities.</p>	<p>Managed retreat is seen as a challenging implementation option (keep it on the table). Given that over the next centuries a large part of the city will have to move to higher ground managed retreat is very likely the path of Least Regret. Many examples for protection/adaptation from the Catalogue of Coastal Hazard Adaptation Options come from countries/states like Denmark, the Netherlands, Florida or Louisiana. These are countries that do not have any other choice being low-lying and densely populated. In Christchurch and/or Canterbury there is plenty of high ground and by comparison we have a very low population density (15/sq km compared with Netherlands 510/sq km). It would be foolish not to make use of our natural advantage.</p>	<p>I could not find an implementation plan detailing when Council will make firm decisions on the individual adaptation pathways per area. We are in a climate emergency which means that it is time for quick and decisive action. Most decisions will have financial implications, will have to go through the LTP process and will have years of lead time. There is no clear set of deliverables for the Coastal Panel, STAG and CHWG. What is the criterium for success? Would the CHAP programme be seen as a failure if a severe weather event causes coastal inundation and triggers immediate (re-)action before any planned changes can be implemented?</p>	Thomas Kulpe
42279	<p>The Coastal Adaptation Framework is detailed as "a starting point for CCC to create adaptive pathways", but many of its potential implications are both devastating and irreversible - such as putting as-yet totally unwarranted flood-prone notations on LIMs for tens of thousands of property owners whose properties will then face dire repercussions with regard to their ability to be insured and/or sold, despite having never experienced any flooding.</p> <p>Addressing and creating guidelines for any new building consents in these areas is logical, prudent and a sensible first step, but considerable additional information, detail and consultation is urgently required with existing communities on how to manage already-occupied properties before any legislation can proceed. And, with regard to consents for modifications to existing residential properties, there should clearly be a provision for property owners to make upgrades and climate change-related modifications, empowering them to better prepare their property for any eventuality.</p>	<p>Managed retreat should be completely taken off the table for a period of time pre-agreed with coastal communities. This language effectively condemns tens of thousands of properties which have no documented history of flooding at all (while apparently neglecting critical Christchurch flood areas such as St Martins and Avonside, which are not coastal, but which already flood badly, annually).</p> <p>There is also a pronounced need for equity in the application of Council resources toward standard mitigation measures such as upgrading storm water facilities and building stop banks. If you compare, for example, the mitigation measures installed in Redcliffs to the absence of such measures in South Brighton, it's no wonder that properties in the more affluent Redcliffs suburb immediately adjacent to the Estuary are expected to weather well, while the whole of South Brighton and Southshore are projected to face significant future flooding. This obvious spending bias is in direct contradiction to the guiding principle of intergenerational equity.</p>	<p>More time is needed for community feedback and consultation. Greater explanation is required for residents to understand the significant variance in the latest modelling when compared to modelling done only 6 years ago in 2015. We are dealing with complex documents and multiple changes that will significantly affect the communities they are imposed on. The time provided to understand the material and discuss among community groups to get a considered community response - when compared to the potentially dire consequences for residents - is clearly inadequate. Further community meetings should be organised to highlight concerns, explain the situation and get feedback. LIM notations should not and can not proceed until numerous questions around risk assessment are resolved.</p>	<p>Residents in some of Christchurch's poorest and most neglected suburbs have been absolutely blindsided by this. While most of us understand the pragmatic need to address the risks of climate change (indeed, those of us living near the coast are probably most sensitive to and concerned about these issues), we simply cannot be put in a position where our properties become uninsurable or unsellable due to future projections of possible climate implications many decades into the future. The focus needs to be on providing guidance, support and tools to communities to better prepare us for climate change, and on CCC building the infrastructure required to protect us, rather than classifying whole suburbs as uninhabitable, which this framework appears destined to do. The future and the financial security of tens of thousands of residents hang in the balance.</p>	Rebecca De Prospo

42208	<p>Critical community infrastructure is not including health centres (mental health) and rapid/emergency facilities due to new covid-19 needs.</p> <p>The framework is not clear on cultural assets that affect infrastructure, social and economic assets.</p>		<p>Transparency on the process on prioritisation on how to decide about assets considered.</p> <p>What are the steps aligned to peoples desires.</p> <p>A process that consider options and alternatives without considering just economic bias of investment.</p>	<p>Totally translated to te reo Maori and other languages to reach international communities in the city.</p>	Bryann Avendano
42206	<p>I think overall its really good, very holistic but its missing an aspect of educating people about the risks and impacts of living on the coast. I feel like education would be really helpful in adaptation and could help bring the community along and maybe make them a bit more accepting of ideas like managed retreat.</p>	<p>I think they're all really good. Especially the Treaty of Waitangi one and the managed retreat one.</p> <p>Add an education principle. Highlighting ideas like managed retreat.</p>	<p>I think more members of runanga should be on the panel because then they can provide traditional ecological knowledge regarding adaptation because there have been cases that built sea walls can inhibit ecosystems on the coast (and make problems worse) so I think their knowledge would be really valuable as they may have other ideas.</p> <p>More youth because I feel like it would be quite intimidating for just two students to be in meetings with a lot of adults.</p> <p>Paying the people on the panel is a really good idea!!</p>		Alyssa Greaney
42191	<p>I know the council managers will take no notice of any submission that doesn't meet with their preplanned agenda.</p>	<p>Is there a guiding principal that meets what the residents want? Or is it all just lip service?</p>	<p>It's all bull shit the council managers demonstrate a disregard for the residents of the east, some have even bullied residents who have spoken up with genuine concerns about yet to be started projects 10 years after the quakes.</p>	<p>I have completed surveys and consultation forms regularly over the past 6 years and come to realise nothing changes. Lived and been active in the community for 45 years. I am disgusted by the the lack of effort, empathy, care and understanding demonstrated by council managers and teams towards the coastal</p> <p>Communities. The current hazards on the estuary track and health and safety issues associated with these are just one example.</p>	Warren Hawke

<p>42169</p>	<p>Do you have any feedback on the Coastal Adaptation Framework? The framework does not adequately cover the range of hard engineering options available and this is reflected in both the Guiding Principles and the list of preferred options.</p> <p>Do you have any specific feedback on the proposed guiding principles? Have we missed anything?</p> <p>1. 5. As interesting as what is included in the guiding principles is what is not there. As has been made very clear, CCC has no responsibility to protect private property; its priority is to protect its own assets. The financial implications of this are that CCC will be loath to undertake infrastructural capital costs that will add to debt. Understood. Financial imperatives will be a big driver in decision-making. But omitting any reference to financial implications is neither transparent nor honest.</p> <p>SUBMISSION: That the financial implications of any option need to be fully understood by rate payers.</p> <p>2. 6. Of the seven guiding principles currently in the framework, the most contentious are the last two:</p> <p>6. Prioritize natural and nature-based options</p> <p>7. Keep managed retreat on the table.</p> <p>The framework claims that these have been lifted from DOC's Coastal Policy Statement (2010) and that by implication CCC is required to follow this. The actual policy statement reads: "The New Zealand Coastal Policy Statement (NZCPS) guides local authorities in their day to day management of the coastal environment." The key qualifiers here are "guide" and "day to day". DOC is not saying its policy statement is mandated: it is offering guidance. Similarly, we are talking about what happens in the next 30-100 years, not what's happening today.</p> <p>When we drill into the details of DOC's policy statement a more nuanced interpretation emerges:</p> <p>"Policy 27: Strategies for protecting significant existing development from coastal hazard risk</p> <ol style="list-style-type: none"> 1. In areas of significant existing development likely to be affected by coastal hazards, the range of options for reducing coastal hazard risk that should be assessed includes: <ol style="list-style-type: none"> a. promoting and identifying long-term sustainable risk reduction approaches including the relocation or removal of existing development or structures at risk; b. identifying the consequences of potential strategic options relative to the option of "do-nothing"; c. recognizing that hard protection structures may be the only practical means to protect existing infrastructure of national or regional importance, to sustain the potential of built physical resources to meet the reasonably foreseeable needs of future generations; d. recognizing and considering the environmental and social costs of permitting hard protection structures to protect private property; and e. identifying and planning for transition mechanisms and timeframes for moving to more sustainable approaches. 2. In evaluating options under (1): <ol style="list-style-type: none"> a. focus on approaches to risk management that reduce the need for hard protection structures and similar engineering interventions; b. take into account the nature of the coastal hazard risk and how it might change over at least a 100-year timeframe, including the expected effects of climate change; and c. evaluate the likely costs and benefits of any proposed coastal hazard risk reduction options. 3. Where hard protection structures are considered to be necessary, ensure that the form and location of any structures are designed to minimize adverse effects on the coastal environment . 4. Hard protection structures, where considered necessary to protect private assets, should not be located on public land if there is no significant public or environmental benefit in doing so." <p>Nowhere here is there reference to "managed retreat" yet somehow CCC has extrapolated from the policy that managed retreat is somehow inevitable. Similarly, why has CCC omitted "hard protection structures" from their framework when hard engineering options constitute much of DOC's Policy 27? The omission appears deliberate since it conveniently fits CCC's agenda of managed retreat to limit its financial exposure. It also dishonestly misrepresents DOC's Policy Statement.</p> 	<p>Phillip Ridge</p>
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	<p>SUBMISSION: That reference to managed retreat be removed from the guiding principles.</p> <p>SUBMISSION: In line with DOC's Coastal Policy Statement, an additional principle is added recognizing that hard protection structures, along with natural and nature based solutions, may be necessary to provide a practical means to protect both public and private assets.</p> <p>Is there anything you'd like to tell us about our proposed engagement and decision-making process?</p> <p>The engagement process appears to be an exercise working backwards to justify CCC's preferred option. The time between CCC consultation/presentation and the deadline for submissions is too short, and does not allow sufficient time for community boards and resident associations to consult with their constituencies.</p> <p>Any further comments?</p> <p>The Tonkin & Taylor Report, detailing areas of risk, is predicated on an as-is basis as if nothing is done. Those areas of risk will change once hard engineering and natural solutions have been factored.</p> <p>SUBMISSION: That a new impact report is commissioned once the impact of hard protection structures and natural and nature-based solutions has been factored.</p> <p>SUBMISSION: That any changes to the District Plan are deferred until this new report has been completed and the community has been adequately consulted on its outcome.</p>				
42120	<p>I am New Brighton ratepayer.</p> <p>I fully support risk-based scenario-driven planning for this exercise, but you have omitted an important scenario: In the same way that the CP will test pathways against a very high scenario (RCP8.5H+), you also need to test against a very low scenario (2mm/yr SLR as per the last 100 yrs). Otherwise could be ignoring a potential very high opportunity cost.</p>	<p>Evidence-based decision making should be added. Might seem obvious, but this is potentially a very emotive and divisive subject. Also need to clearly signal that the work of the CP is not political - that comes later when it goes to Council.</p>	<p>Not nearly enough community consultation, and insufficient detail about the processes involved. This is hugely important in order to get public buy-in. MfE guidelines include very comprehensive info on this, but seemingly not picked up by the Council for this framework. Need at least four genuine consultations, utilising a wide range of methods, over at least 12 months.</p>	<p>If the CP and STAG are all Council appointees, with meeting procedures tightly controlled by Council staff, then stakeholders and residents are unlikely to accept them as genuine community representatives, especially since all CP meetings are to be in-committee until the end of the process.</p> <p>At some stage in the future it is inevitable that there will be disagreements about the actual rate of SLR as measured on our coast. We will want to know which SLR scenario is actually playing out. With huge natural variation in measured SL it will always be difficult to discern the signal from the noise. It would be a good idea to start now with a major long term study to try and fully understand the local/regional/global influences on our sea level measurements over a range of time scales - perhaps a University of Canterbury multi-disciplinary project?</p>	Vic Allen
42110	<p>Do you have any feedback on the Coastal Adaptation Framework?</p> <p>I do not believe it adequately conveys the flood risk to my local area of Sumner .</p> <p>Your mapping seems wrong - I have photos to prove it and majority of flooding occurred in Sumner in 2014 and 2017 due to a) council not upgrading the stormwater pipes</p> <p>b) council not clearing stormwater release located along the beach at Scarborough of sand</p>				Charlotte Dooley

	<p>c) property owners and ccc not clearing blocked and leaf laden drains .</p> <p>d) coincidence of these factors and an incredibly high tide at the time (2014)created a perfect flooding event</p> <p>Had ccc made efforts to mitigate prior to these events the level of flooding if indeed any would have been dramatically reduced.</p> <p>Our property falls within the mid range proposed however it didn't suffer any flooding on either of these events. I have photos to prove this and my husband is part of FENZ who responded to all flooding incidents requiring intervention and our home was not one of them. The latest heavy rain that we had a few months ago had little to no impact due to the fact the stormwater pipes have been upsized and the council dug out the stormwater releases at the beach.</p> <p>I would argue that all this could have been prevented with foresight by the council. Surely now mitigation has taken place the risk is far lower NOT higher ???</p> <p>Photos attached show Clark st /colenso st end which did indeed flood (would it have if council had done proper maintenance prior) and the far end Campbell/Clark st which had surface flooding in leaf blocked street drains only . Had there not been large trees dropping lots of leaves this most likely have been non existent .</p> <p>Do you have any specific feedback on the proposed guiding principles? Have we missed anything? Correct information missing on actual flooding.</p> <p>Is there anything you'd like to tell us about our proposed engagement and decision-making process? What engagement has taken place ?? A letter to affected homeowners should have in the very least occurred if you are planning to change the Information on our LIMs</p> <p>Any further comments? Please contact me if you need photos. I would suggest you perhaps contact FENZ for a report on flooding incidents and what was required - ie clear sand blocked council stormwater and ccc maintained street drains .</p>			
42105	<p>What is the proposed method for engaging with the coastal panel and recruiting people? Going into schools and local community groups to recruit people could be worthwhile, as many will not be aware or have the time to spend on the council website to find out more.</p>	<p>Love the natural and nature-based options principle! Also inter-generational equity issues will be very important. In fact all the principles are great, but will obviously be hard to action. How will you be kept accountable for upholding these?</p>	<p>Panels can be an exclusive way of gathering a community's perspective:</p> <ul style="list-style-type: none"> - there are barriers that may stop more vulnerable people from being on a panel e.g. those who are time poor, have extra responsibilities like work or unpaid work (childcare). - panels require people to come to the council rather than going to people where they are <p>It is very difficult to get a representative view from a panel for these reasons.</p> <p>However, these can be overcome through seeking members who are connected with those who may not feel confident or able to join the panel. Seeking out these people and shoulder tapping through various means will be crucial, and being flexible for meeting times to ensure those with other commitments can make it. Making it as accessible as possible will be super important!!</p>	Luci Trethewey

42104	It is good, it is much needed, as the impacts of climate events on Christchurch will be significant. Really looking forward to how this mahi can improve our communities.	-As a 22 yo, I think the inter generational equity principle is really important, so I support this.	Potentially would someone with an urban planning, or landscape architecture or transport planning background could be good at advocating for adaption that promotes density and proximity to amenities. All aspects that could improve the liveability and vibrancy of our communities.		Nick Reid
42103	As a young person, the focus on adapting for the future is necessary for addressing climate change.	I think that the principles would benefit from including education of the coastal hazards into schools and public domains. This will embed science and information into the awareness of the general public.	I appreciate the appointing of representatives to be a part of a panel. I think that the panel could be strengthened by increasing youth and runanga representation. Encouraging equal representation of runanga and the wider community will ensure that people feel comfortable sharing their opinions. If this is not possible from a resourcing perspective, on future panels, equal representation should be strived for.	I like the prioritization of natural solutions more than structural/engineering solutions because I think these solutions are important to consider.	Breanna Greaney
42102	Overall, I think it is a really good idea. My main concern is getting the right people to represent communities on the coastal panel. These people should be on the Coastal Hazard with the correct intentions.	<p>On Guiding principles:</p> <p>> Upholding te Tiriti o Waitangi:</p> <p>- Need to know the values that Ngai Tahu and Maori want to preserve and protect. ie assets that they value such as culturally significant sites. Can be done through engaging with Ngai Tahu and mana whenua. Need to communicate hazards/pathways effectively and clearly ie translations on hazard maps. Can the framework be translated into Maori?</p> <p>> Focus on public assets that contribute to the health, safety as wellbeing of communities:</p> <p>- Great guiding principle, health and safety of communities should be maintained.</p> <p>> Recognise inter-generational equity issues:</p> <p>A plan that can be implemented now might not be the right plan in the future, with different scenarios. How can you ensure that these solutions can be beneficial in the future? Will the Coastal Hazards Framework pass down information on solutions/plans to future Coastal Panel groups etc?</p>	A Coastal Panel is a really good idea to collate and gather information from the wider community. The STAG team of specialists can help inform the recommendations from the Coastal Panel. The work between STAG and the Coastal Panel will be critical to the success of adpatation pathways. Communication between the groups should be clear and transparent.	The advertisement for recruiting the Coastal Panel should reach wider. Advertising suggestions: on facebook and facebook groups ie UCSA (UC facebook group), communities ie Mga Pinoy Ng Christchurch (Filipino Christchurch group) etc. We need people on the Coastal Panel that will represent their communities well and so advertising should be wider.	Hannah Mae Jerao

42101	<p>I would it's overall good to start the CAF (Draft at the moment) as slightly broad due to the change in the Natural and Built Environment Act and Strategic Management Act. However, in the near future, there should a slightly 'narrow-path' to how councils could adapt to the natural hazards in our communities once the acts are passed through.</p>	<p>Just out of interest, please specifically mention how te Tiriti o Waitangi would be incorporated to the CAF (such as what are the roles of Ngaai Tahu or Ngati Wheke would contribute int eh consultation process).</p> <p>I love how the council will prioritise natural based processes. However, before finalising the document, CCC and CHAP Team should be able to identify the different and appropriate natural based options that are specific for Lyttleton Harbour.</p> <p>The proposed guideline should include education as a strategy for addressing and recognising the inter-generational equity issues. Education may include reaching out to primary schools and secondary schools about the risk of a coastal inundation int he region and the 'must' to be adaptable to these natural hazards.</p>	<p>For the Coastal Panel, with the current climate of the coastal panel, there should be a slight higher number of the coastal panel. Since this adaptation framework would like to focus more in younger communities, a suggestion would be to gather different Christchurch Youth Councils (from the CYC, Environment Canterbury Youth Roopuu and so on) as a starter to increase youth representatives. However, to increase the diverse range of youths, there should be more 'advertisement' of the panel towards tertiary and secondary school students. This helps prevent the reliance on the Youth Council to represent the youth communities and add in more ideas.</p> <p>Traditional Ecological Knowledge is important for the CAF from the CCC. The numbers of Maaori Communities are good within the Coastal Panel. However, it's good to highlight that resourcing on these communities may differ and may not provide as much representatives as wanted/needed.</p>	<p>I love the idea of the primary school workshops in relation to climate change are taught throughout the eastern and Lyttelton region. This could be a similar concept for the wider university and high school communities.</p>	Greg Kidney
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42100	<p>This is an extremely complex and important piece of work so well done. Immediate concerns with consistency and continuity of the process over extended timeframes (5+ years) as the hazards and community make up changes.</p> <p>Believe the use of an independent technical group is excellent, do these STAG members have to declare any conflicts of interest in each community?</p> <p>Current documentation is unclear how te Tiriti o Waitangi will be upheld - stating it is one thing but outlining what that process looks like (or would look like in adaptation options/proposals) is another. I.e. in the proposed adaptation pathway(s) submitted from a community panel to council, is it expected that there will be a section covering how the principles are upheld (or not)?</p> <p>Unclear how community panels will be supported to write their adaptation pathway proposal(s). With the impact that different pathways may have - it is critical that proposals from the community panel are well written and argued in terms of the decision criteria, however, that expertise doesn't always exist within these panels.</p>	<p>The guiding principles look good. My one concern is any missing points around "vulnerable" populations and current equity issues as well as just transitions throughout the adaptation process.</p> <p>Nothing around timelines or continuous support - adaptation pathways set by the *current* community may extend for 10-50years at which point the community and hazardscape will have changed. Are the council committed to helping communities or the coastal panels to re-evaluate options or work through their adaptation pathway all the way through?</p> <p>It would be a massive shame for all of this work to dissolve in x years and leave communities high and dry (or low and wet as it may be) before having to start a new process again 10 years after the fact.</p> <p>Should there be something surrounding education? Re continuing educational resources for communities to understand the risks and feasible options over the next ~20+ years.</p>	<p>I believe the ratio of wider-community members to community reps is disproportionate. Currently stated as 3 and 6 respectively - but I would've thought having a slightly stronger weighting of community reps would be favourable (especially if at least 2 of the 6 need to be youth).</p> <p>What will the facilitation process look like to avoid the 'loudest in the room' overbearing discussions as is often the case at these engagements?</p> <p>How will you ensure diversity among the panel? Especially if you have 6 people apply - does the timeline extend until feasible or does it go ahead without the stated diversity of backgrounds, knowledge, and interest?</p>	<p>As mentioned, this is an extremely important and challenging piece of work. Well done to the CHAP team for undertaking this.</p>	Mitchell Anderson
42098	<p>Need to consider engineering solutions first, and enable transparent feasibility studies.</p>	<p>Ensure diversity, equity, multidisciplinary and multicultural approach, deadline are met and solutions are found.</p>	<p>Local plans for local communities and environments : People from out of zone should be considered is the coastal panel because all Christchurch resident use the coastline area and public facilities.</p> <p>The STAG advices need to be reviewed by independent experts.</p>	<p>More coastal hazards should be considered (seawater intrusion, for impact on subsurface infrastructure and ecological impacts) and probably compound processes like fluvial, pluvial, marine and groundwater flooding hazards for risk evaluation.</p>	Amandine Bosserelle

42097	<p>It could mention te Tiriti o Waitangi and its principles more. also mention more how you plan to uphold this, the processes in place etc. this makes your progress upholding these values more visible to the public.</p>	<p>-upholding te Tiriti o Waitangi is very good, I would love to see more about how this is going to be achieved/how you will be held accountable</p> <p>-very good to see a diverse and holistic approach</p> <p>-focusing on public assets is definitely very good and important. I understand the difficulty in getting the council to fund protection for private property, but I would like to see more of a push for this. We spend so much of our lives on private property. If the private property is not protected, there won't be much of a community left to use the protected public spaces.</p> <p>-this kind of conflicts with 'recognise inter-generational equity issues', as it means down the line, communities with less equity will be at more risk.</p> <p>-the 'recognise inter-generational equity issues' principle as a whole is super good and very important. I value this goal alot. in my opinion, this is the best strategy for protection as it invests in itself.</p> <p>-keeping managed retreat on the table is also very good to hear. This protects against risking lives or the environment for monetary gain.</p>	<p>-there could be more people on the panel</p> <p>-with more people, there can be more space for a greater diversity of interests. eg queer communities, families, business owners, etc</p> <p>- I would like to see more youth representatives as they are affected the longest. They are also a valuable resource for innovation.</p> <p>-it is great that anyone can apply for the panel</p> <p>-it is also great that the panel seems to serve as a synthesis of the community's voice.</p> <p>-it is very good to hear that communication is continuous with the council throughout the process, to avoid large disagreements between the council and the community's interests at the end.</p>		Amelie Bunt Rowe
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42096	Overall, I believe it is well-structured and well thought out. I would recommend all things outlined, and am happy with the flexibility and how the whole framework can be adaptable.	I do not believe you have missed anything with these guiding principals, they all encompass values I would consider.	I believe that if the Coastal Panels are kept on track with timing, are in agreeance with the STAG technical groups findings and that appropriate representation is achieved, then the proposed engagement process would be satisfactory. I would perhaps not set certain numbers of full voting members from different backgrounds, but suggest setting these as minimum values and allowing more people to sit on the panel. I don't know the perfect trade-off between more ideas vs more talk and disagreeance, but I would imagine a dozen people probably isn't enough. In terms of the decision making method, I would hope to see that the community objectives are derived from the adaptation area, and not just the panel - and hope that community-wide engagement pulls through and you get decent results! When performing the analysis, the matters that they should consider (pg17) seems to be well-founded and	No further comments	Sam Archie
42094	Why can't you make the estuary edge Southshore like the beautiful edge at sumner????		We just want a fair deal here. You have put so much money into the walkways from Ferrymead all the way to Sumner... What about the other side south new Brighton to southshore	We would love a small walk/cycle bridge southshore spit to redcliffs. The council is amazing at pointless cycle lanes so why not make one people will love to use	Jan W
42068	I support the Council approach, congratulations.	I think prioritizing natural & nature based options is unfair to areas that have not yet had hard engineering. Lyttelton, Sumner and Redcliffs have while Pegasus Bay hasn't.		I support Protection adaptation. Dredging the estuary back to traditional depths. Reassess a Seagate at the Spit end.	Todd Carbines
42052	What's the efficacy of certain proposals? e.g. sea walls are only good for a short amount of time vs. retreat. I think this information needs to be communicated. What sort of behavioural changes go along with the physical changes? I think it's really important for communities to know what may be expected of them.	A principle around equity of protection, recovery and response for vulnerable communities. Also a promise to not be strayed by money and power (in lots of places wealthy land and homeowners are the ones controlling the conversations and actions through money and power)	What are your plans for communicating these decisions to the public? I think it's important to make the larger community aware of these changes. Also maybe visuals of how Christchurch may look in the future, while normalising that we are uncertain and that things are likely to change.	- How are you engaging with vulnerable communities? - I often feel as a non-resident in this country that I'm not allowed to comment on council changes or be involved in processes. It would be helpful to know how visitors to this country (many of us are still here due to covid) can and should contribute.	Molly Magrid
42051		I particularly appreciate the principle 'recognise inter-generational equity issues' and 'keeping managed retreat on the table'	- Focus on why people should care - Where possible, provide options for selection - Use other influencers to help and use their social capital - Make the process of engaging / submitting social! - Helps having youthful facilitators		Emily Ward

41922	There is very little about wanting to protect housing & assets from coastal hazards. This is surely the ultimate goal and main topic.	The control of upstream stormwater of rivers leading into the estuary is a concern. More house / roads/ hard surfaces upstream means more water & silt flow towards the rivers and then estuary.	Surely the council should engage two consultants - one demonstrating potential sea rises and consequences and another demonstrating other factors resulting in reducing sea rises and benefits of retaining assets in the areas.	This is another feeling of devaju as the council had to retract on previous misguidance and now looking to start it all over again in a different format.	Greg Ritchie
41829	In saying that Council is not responsible for private property it needs to consider that housing may have been allowed where it should not have been allowed	Planned retreat should be more than ' on the table'. It is an important adaptation to inevitable sea rise.	Consultation is good but it has to be informed by knowledge from specialist experts on the science and social and psychology information	For Diamond Harbour the critical factor will be transport links. The road to the city may be flooded so ferry links and self sufficiency would be important.	Joy McLeod
41817	<p>+Very supportive of the Retreat and Avoid adaptation options</p> <p>+Support the CCC role as defined, with an emphasis on facilitation/enabling the extensive work across and between sectors, industries, functions etc. for us to move towards living in healthy relationship with the natural world and experience holistic wellbeing</p>	<p>+Re: Develop local plans for local communities and environments - I support work at the Empower end of the IAP2 engagement spectrum - citizens need to be deeply involved in the process, from setting the aspiration, identifying the symptoms, understanding the root causes, and taking action on these with what to do becomes clearer; all while recognising the current inequity in knowledge awareness, legislative responsibilities, and resource access</p> <p>+Re: Prioritise natural and nature-based options - this language needs to be strengthened; the only future that could enable the long-term viability of humans and diverse species in Waitaha is learning how to live in healthy relationship with the natural world, including disconnecting from energy and material dependence; therefore, it is not a case of prioritising these options, it is mandatory; the question is not "do we use natural and nature-based options?" but rather "what must we do so that we do use natural and nature-based options?"</p> <p>+otherwise, the guiding principles mostly cover the Living Systems Principles of: Holism (nestedness), Uniqueness (strengths and diversity), Mutualism (interdependence and connectedness), Evolutionary (agile and emergence), Nodal (decentralised, especially in decision-making and feedback loops), and Developmental (learning)</p>	<p>+follow a process that defines the (attainable) aspiration, builds awareness of the symptoms through to the root causes and builds relationships, identifies where attention is required, and creates the conditions for the actions to emerge, from the potential created by going on this journey together; this is multi-generational work and we can't avoid the fundamental spiritual/psychological, social/cultural/political, or ecological challenges along the way, we must go at a pace that we can sustain over the long-term</p> <p>+I support work at the Empower end of the IAP2 engagement spectrum - citizens need to be deeply involved in the process, from setting the aspiration, identifying the symptoms, understanding the root causes, and taking action on these with what to do becomes clearer; all while recognising the current inequity in knowledge awareness, legislative responsibilities, and resource access</p> <p>+include representatives from all groups that will either have to do things/behave differently in the future and those who will be doing the work on the ground to make changes during implementation</p>	<p>+disclosure: I am a change leadership coach who works on effective approaches that lead to implementation of effective solutions, to whatever is discovered along the way; my focus is on social and environmental regeneration</p> <p>+I am able and willing to contribute further to this process as invited</p>	Mark Kroening

41792	<p>I would like to congratulate the Council on producing one of the best documents around planning for climate change that I have read. I imagine substantial work has gone into this, well done.</p>	<p>The document mentions that there will be the use of “soft engineering options” on page 8. The term that should be used is eco-system based adaptation. Using terms like ‘soft’, juxtaposes it against the much desirable ‘hard’ which people assume is much more secure and resilient, which is obviously not the case. Not using the correct terminology means the natural environment becomes obscured in adaptation planning. This has been shown with sectors of the community leading adaptation discussions with a private property trumps the natural environment narrative. Paradoxically this mindset of private individual wealth having more rights than the natural environment is what is the root cause of climate change.</p> <p>Page 8 outlines five different adaption options. This is a great piece of work and is logically laid out. I am also happy to see that retreat is in there as it has so often been seen as a taboo discussion. In many situations where communities are low lying and vulnerable this will be the most feasible option. Coastal retreat of private property in some locations can lead to more widespread community and environmental gain by providing a buffer between the hazard and communities.</p>	<p>Page 12 outlines that the STAG will be established with a range of experts. It is important that the experts are appropriate for the role. In many of the discussions I have been engaged in in coastal Christchurch around climate change some of the ‘experts’ are self-proclaimed experts. Council needs to make sure not only that it engages with genuine experts, but that it includes an appropriate range of experts. The STAG needs to include social scientists that can provide some socio-cultural context. It also needs to include ecologists that understand the importance of Christchurch’s coastal ecosystems. There are surprisingly few ecologists that understand these coastal zones in their entirety and some of the best ecologists are already working for Christchurch City Council.</p> <p>I like the tone of the document that suggests Council will more proactively work with communities. I would urge Council to make sure that there are individuals within Council that are easily accessible on a day-to-day basis that can be contacted by those in the community with concerns. I would also urge that Council rely less on social media conversations about these complex issues as that forum quickly descends into chaos and uninformed climate change denial. The use of drop-in type meetings rather than town hall type meetings is very smart and avoids creating points of conflict.</p>		Scott Butcher
41768	<p>Thank you for visiting the Sumner community and presenting the Coastal Adaptation Framework last night.</p> <p>I am comfortable with the how the Framework documents the roles and responsibilities, the proposed guiding principles and the proposed engagement process.</p>	<p>I am comfortable with the proposed guiding principles.</p> <p>Is there a role for the CCC to share/advocate for local proposed solutions and decisions with neighbouring governing bodies and central government that could also be included/documented?</p>	<p>I appreciate that Coastal Adaptation is a discrete piece of work, but could council also articulate to our community how the 'Race to Zero' climate initiative commitment links in with this work? Or, taking it even further, could the planned community consultation opportunities for Coastal Adaptation also look at local commitments to emission reduction?</p>	<p>Thanks again. This is an important and pressing piece of work. Despite the difficult conversations that will no doubt float to the surface, our city will be better off for your efforts now and in years to come.</p>	Helena Parsons
41761	<p>need different language options</p>	<p>explain intergenerational effects more in terms that youth will understand e.g. explain tax burden in the future (\$1 now saves \$5 in the future)</p>	<p>Katie Mills is part of the knowledge commons, great at facilitation. she got the pop-up uni vaccine clinic underway by getting clubs (SVA, UC greens) on board. community leaders/peers/influencers (Instagram 'shit you should care about'). have people understand how their submission is being processed or what weight it carries in the decision-making process</p>		Sophie Clarke

41718	I'm happy that things such as inter-generational equity is being acknowledged within this framework, along with having a focus on prioritising natural and nature-based solutions, as despite the various benefits that these have been found to produce they often seem to be forgotten about within various planning frameworks. It is also good to see there being a focus on public assets that contribute to the health, safety and well-being of communities as these are integral to local communities so should be focused on.	I think the 7 principles outlined are great, and its good to see all of these issues being addressed within this framework.	Regarding the point surrounding nature-based solutions, I feel providing easier to access information could help both implementing those solutions but also community acceptance of them as well. From what I can see the Catalogue of Coastal Hazard Adaptation Options is an 83 page document, so perhaps a series of those short videos detailing what coastal hazards are could be used to describe how nature-based solutions can be effective at mitigating coastal hazards.		Tyler McNabb
41535	Looks good, generally agree with the guiding principles.	Big fan of these two principles / areas of focus: - Private asset owners are responsible for managing risks to their assets and incomes. Any private benefits from Council funded adaptation should be indirect or incidental. - Recognise inter-generational equity issues.		It is great to see the council taking an approach where it's their responsibility to identify the risks, protect public assets and provide guidance on possible risks for private assets / stop new building on risk prone land. I would be heavily opposed to large rate payer funded buy-outs of private assets / land.	Aric Thorn

6 December 2021
Attention: Christchurch City Council

SUBMISSION ON THE CHRISTCHURCH CITY COUNCIL PROPOSED COASTAL ADAPTATION FRAMEWORK

EXECUTIVE SUMMARY

1. This submission has been made by the majority of the executive committee of the North Beach Residents' Association (NBRA). Due to the short consultation period the Christchurch City Council (CCC) has undertaken, the NBRA committee has not had adequate time to discuss the Coastal Adaptation Framework and the proposed District Plan changes with its members and its wider community. To enable us to do this, we need more time.
2. Irrespective of the engagement process outlined in the Framework, we submit that the process for the adoption of both the Coastal Adaptation Framework and in particular changes to the District Plan has been rushed and needs to be paused. Given the vast amounts of technical information and the present and future implications, the community needs more time to fully digest this which will enable them to provide a considered response. The time of year along with Covid19 has not provided communities with a fair opportunity to submit. As it stands, the perception of this process to date is that CCC's desired outcome has already been decided and the engagement process is an exercise in working backwards to justify its preferred option.
3. New Brighton is one of Christchurch's oldest suburbs with European settlement dating to the end of the nineteenth century. Its residents are passionate about the suburb and want to see the area continue to grow and thrive. The proposed changes to the District Plan may have a detrimental impact on the community's development, leading to its long-term decline.

COASTAL ADAPTATION FRAMEWORK FURTHER COMMENTS

4. We request a pause in the Coastal Adaptation Framework process until the community and stakeholders agree on the final Guiding Principles. From principles flows policy and from policy come actions and regulations. Everything flows from the guiding principles.
5. From the outset, the Guiding Principles were selected with input from Papatipu Rūnanga and Environment Canterbury (Ecan) but notably without any community input. We request that CCC revisit then adopt a more transparent approach with more open-ended questions regarding what the guiding principles should be, from the outset, rather than internally developing seven principles without community input.
6. In terms of the specific principles:
 - 1) **Uphold the Treaty of Waitangi** – support
 - 2) **Develop local plans for local communities and environments** – We support localised plans in principle but it is unclear where boundary lines will be drawn and if each locality will be treated equitably – there is not enough detail. It is also unclear whether each locality will be guided by science that is locality-specific and has been tested against the reality of that locality.
 - 3) **Focus on public assets that contribute to health, safety and well-being of communities** – It is artificial to consider public assets in isolation; CCC has a duty of

care to the community as a whole, including private assets, to support social and economic wellbeing.

- 4) **Be flexible and responsive** – We support this but are concerned that this will not happen in practice.
 - 5) **Recognise intergenerational equity issues** – Although we do not want to unduly burden future generations, we also do not want to act so conservatively that this generation is prematurely and disproportionately affected only to find out in the future that the modelling based on worst case scenarios was inaccurate.
 - 6) **Prioritise natural and nature based options** – The principle also needs to include recognition that hard protection structures may be necessary.
 - 7) **Keep Managed retreat on the table** — This should not be included as a guiding principle. CCC have listed five ways to adapt to coastal hazards of which retreat is only one. As such, it is inappropriate to focus on only one of those options. In its Framework document, CCC claims that Guiding Principles 6 and 7 are in line with the Department of Conservation’s New Zealand Coastal Policy Statement (2010). Yet the NZCPS states that managed retreat should be considered a risk reduction response *along with other options* and this is the position CCC should take. Specifically, the Guiding Principles do not faithfully reflect the intent and wording of the NZCPS’s **Policy 27: Strategies for protecting significant existing development from coastal hazard risk** which specifically applies to suburbs such as New Brighton and which states *“that hard protection structures may be the only practical means to protect existing infrastructure of national or regional importance, to sustain the potential of built physical resources to meet the reasonably foreseeable needs of future generations”*. Having managed retreat stand alone as part of the guiding principles spotlights it out of context and creates undue stress and uncertainty for many people.
7. In terms of the Coastal Panel composition, we submit that a 75% majority of members should be living in our local community and selected by the community.

The NBRA wish to speak to their submission.
Thank you

SIGNED:



Josiah Thompson
CHAIRPERSON
NORTH BEACH RESIDENTS ASSOCIATION
northbeachra@gmail.com

Coastal Adaption Framework

Submission Feedback of Southshore Residents Association (SSRA)

The views of SSRA are underpinned by three key values:

1- Kaitiakitanga – that we are temporary guardians of things that are precious to us and have a responsibility to look after them for future generations.

2- Oranga – preserving the health, vitality, and wellbeing of living things (environment, community, and individuals).

3- Manaakitanga – and that is our duty of care for others – to uphold their mana, respect them and look after them.

With these values, SSRA believe we are better able to work together to respond to adversity; to achieve a resilient and vibrant communities with a sustainable future; and to build and maintain our community so all our residents feel valued and included and can contribute to the best of their abilities.

Southshore is our tūrangawaewae. It is the place where we feel especially empowered and connected. It is our foundation, our place in the world, our home.

Do you have any feedback on the Coastal Adaptation Framework?

SSRA acknowledge the work of the CCC staff. They have made notable efforts in the creation of easy-to-read literature and in their proposal of a Coastal Framework Adaption process that includes the community as a participant. This is a vast improvement on past processes. It is heartening to see that staff have listened to feedback from community groups and have put thought into how they could do things better and achieve a more mutually satisfactory outcome this time around. We certainly appreciate the opportunity to provide feedback. Thank you.

This is, and will be, a large on-going and complex project. We say complex because these are typically defined as those projects that require the ability to be approached from multiple, sometimes competing, perspectives and which may have multiple possible solutions. Complexity is nothing to be afraid of and can often lead to innovation.

This is a good start, but SSRA feel we are not quite there yet. We offer the following comment to improve the process further and to create a better experience for the communities affected.

SSRA general views on best practice engagement as a process (Coastal Adaption Framework)

It is important that CCC ensure they enter into a good-faith journey and be genuine about the process of engagement. This should come from all areas of CCC. It must be a safe place where all participants are welcome, respected, and all questions can be asked- not just the convenient or easy questions.

Engagement should be seen as an investment that builds trust and therefore can be seen as an ongoing asset that should generate benefits long after your initial investment. Don't rush it or underfund it.

To be genuine in this framework, CCC needs be agile and reflective of the results of the engagement. There has been much history of predetermined outcomes prior to engagement in the Southshore community.

We would encourage the CCC follow the International Association of Public Participation (IAP2) for good practice engagement guidance. This is referenced by the MFE (*Framework for the national climate change risk assessment for Aotearoa, New Zealand*) as best practice.

IAP2'S PUBLIC PARTICIPATION SPECTRUM



The IAP2 Federation has developed the Spectrum to help groups define the public's role in any public participation process. The IAP2 Spectrum is quickly becoming an international standard.

		INCREASING IMPACT ON THE DECISION				
		INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL		To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
	PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision. We will seek your feedback on drafts and proposals.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will work together with you to formulate solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

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Submission timeframe- not enough time!

SSRA feel that the time allocated for feedback is insufficient. We are dealing with complex documents and multiple changes that will significantly affect our community. Though five weeks was allocated for feedback this was, at best, two weeks. By the time our members attended a CCC briefing and were able to read and fully understand the vast amounts of material, there was no time to ask further questions, get clarification or discuss the meaning and impact with our community, let alone get a considered response back from our community. We feel the submission timeframe was inadequate. We suggest that the briefing sessions should have happened prior to the opening dates for the submissions or at the very least an allowance of 5 weeks from the last session date.

We would have valued the opportunity to meet with other coastal residents' associations prior to sending in our submission. This would have allowed us to discuss and share views. This was not possible in this short timeframe. The best we could do was share submissions digitally prior to the submission date to our community and other associations in the hope that it would contribute to a collective understanding.

Update: We sincerely appreciate the CCC extending the submission time after feedback from the community saying that it was not adequate. We have left our original comments in the submission to indicate why we felt an extension was important.

As this is the very first step in the journey, SSRA feel that it is worth CCC taking some learning from this. It is evident that communities are interested, they do wish to ask questions and gain understanding, and it is only fair and reasonable that they are not rushed or asked to adhere to unreasonable timeframes.

No opportunity to provide feedback on the foundation documents.

The framework feedback is centred around the process and the conversation. The conversation is centred around interpretation of the data and the response to it. All information for adaption and planning is based on the T&T report - the community is concerned they have had no opportunity to ask questions, discuss, and feedback on any issues regarding this report. We suggest the community needs to have the opportunity to have a closer look at the T&T report to have confidence in the information. Communities will require some expert assistance to do this.

The coastal community panels.

CCC feedback asks for input on the makeup of individual coastal community panels, both who, and how many. It is disappointing that before the submission closing date, the Lyttelton expressions of interest page contained a TOR (draft), that already indicated how the group would be structured. This does not give communities confidence that their input will be genuinely considered. The below table was not in the Coastal Hazards Framework document.

SSRA has the following views on the composition and procurement of the Community Panel.

- SSRA find it difficult to support 6 as the number of community reps when we do not know how big the area covered will be. 6 people just for Southshore and SNB might be sufficient. But six for a larger area encompassing more suburbs may not be adequate.
- 6 local community members should be the minimum. At least 2 members from each affected community in the group is suggested.
- SSRA view the local representation (must reside, own property or a business in the area) percentage as inappropriately low and suggest this should be at least 80% including Runanga. The CCC has 1 voting representative and an ECAN rep plus number of representatives on the STAG group. Our view is that they have a sufficient level of input from that sector.

Full voting members	Numbers
Rūnanga	TBC
Community representatives	6
Wider city representatives	Up to 3
Environment Canterbury Zone Committee representative	1
Te Pātaka o Rākaihautū Banks Peninsula Community Board – ward representative	1

¹ With the Te Pātaka o Rākaihautū Banks Peninsula Adaptation Area shown for context.

Observer participants (non-voting)	
Coastal Hazards Working Group (CHWG) members	
Non-CHWG Councillors	
Te Pātaka o Rākaihautū Banks Peninsula Community Board members	
Support roles (non-voting)	
Independent Chair	1
Panel Secretary	1
Specialist and Technical Advisory Group (STAG)	TBC
CHAP programme team members	TBC

- SSRA believes that the community is better positioned than the CCC to decide who is best to represent them on the coastal panel. Therefore, it is our view that the residents' associations be responsible for appointing the local representation, not the CCC. At the very least, residents should have a participatory role in the selection.
- There seems to be a pedantic focus on local and non-local balance for these groups. Do the CCC not believe that locals within an effected community can have a sensible balance approach? SSRA ask why that balance cannot come from within the affected community. SSRA fear that this focus will be at the cost to the local silent majority who are interested but are often unable to engage.
Don't discount the silent majority while seeking out the hard-to-find.
- It is SSRA view that if non-locals are to be on the panel, they must *apply*, and not be *appointed* by CCC. The affected community, residents' association, and community reps must be the ones to select the 3 non-locals. The CCC need to show that they have trust in the community and give then the autonomy to select for "balance", skills, or the diversity they are lacking.
- Trust in CCC from the residents of Southshore is a very fragile concept. SSRA would like to see this trust develop. From a group dynamic perspective, we are concerned that if the local reps do not get the opportunity to participate in the selection of the non-local reps there could be serious issues within the group. Equally, if the community perceive that all the representation has been selected outside of their control, their community, or their input, even if the reps are locally sourced, we believe residents will disengage and have little perceived connection with the representation and subsequently will distrust the process. These concerns are raised based on the experience of our residents in the Coastal Futures group, where the community's suggested selection of a member was not accepted and a person who the community did not support was selected. If it is to be genuine engagement, this is the type of "balanced" selection process we wish to avoid.
- SSRA have some questions regarding the STAG. Will the expert group be a group of people for all areas?
- Again, to foster trust, allow a community to appoint experts they have confidence in, to the STAG.
- We propose that the STAG members be at least 50/50 council/community appointed, and that there needs to be funding for non-council experts. The use of Gary Teear in Southshore is a good example of using a trusted community expert to move a stalled project forward.
- It has been indicated that there is a desire to have young people on the panel, either local or external. We could not find the definition of a young person for this purpose in your documents. Could you please provide one?

- We agree there is a need to engage with individual communities, but also there needs to be an overview to ensure consistency. How will this be achieved?

Southshore Specific Coastal Hazards engagement.

SSRA wish to reiterate that Southshore has always maintained they will not be inclined to have the coastal adaption conversation under any framework until several historical issues are remedied in the area.

- Firstly, that the estuary edge repair is completed. The proposed timetable for this repair is 2024 despite the CCC voting to “Recommend that funding be made available for implementation of the estuary edge earthquake legacy repair in 2020 and urgently prioritised”.
- The community insists that they cannot have a meaningful and accurate conversation until the project is complete. Once built, they can observe and evaluate the outcome of the edge repair and how it may contribute to any adaption conversation. Until this time they are not able to make any decisions on what additional future adaption may be appropriate as they do not have the relevant information to engage.
- If the CCC wish Southshore to have this conversation sooner than 2024 perhaps they may wish to bring the estuary edge repair process forward.
- The irony of erosion hazard mapping along the estuary edge is also not lost on the community. Given that the very lack of action by the CCC has and continues to cause the very erosion they are mapping, erosion that should have long ago been mitigated.
- Secondly, SSRA has continuously highlighted the inadequate design, attention, and maintenance of the storm drainage system in this area. Before a coastal conversation can take place regarding future adaption the community must have a baseline level of infrastructure service that sufficiently addresses the present-day concerns.
- SSRA suggests that consideration needs to be given to the lack of equity between those areas that have already had protection provided and those that have not. We believe it is an uneven playing field. The NZCPS indicates that the preference is for softer edging but **does** say that hard edging can be used when it is the best solution. “Hard edging” is a misnomer in that it is not just rock and concrete, can take many forms, and many are ecologically sound in their construction and consequences.

Q- Do you have any specific feedback on the proposed guiding principles? Have we missed anything?

- SSRA acknowledge your guiding principles but have concerns over how they are presented.
- **Recognise inter-generational equity issues.** While we support the concept that the burden of cost should not be left solely for future generations to bear, we are equally concerned that the burden of cost, and the adversity of affect, should not be solely placed on the current generation. The concept of adaptive planning is to spread the costs across time as and when it is needed, so we don't burden any one generation of residents unnecessarily.

Furthermore, deciding to restrict investment is a false economy. It does impact future generations, as they end up paying the costs of rundown and badly maintained communities. Evidence of this can be seen in New Brighton. Where the lack of investment due in part to difficulties of investors getting planning over the line, has led to a dilapidated community that is constantly in "fix mode".

If the CCC are genuinely embarking on a pathways approach that considers multiple strategies, then this will help reduce the risk of over-investing, or under-investing in adaptation and over-burdening singular groups. The ability to assess various strategies over longer periods will allow CCC to spread or defer large capital costs for future projects over time and allow efficient planning and funding of projects. For this reason, we do not feel this guiding principle is appropriate or balanced in its approach.

- **Prioritise natural and nature-based options.** We acknowledge that the NZCPS directs councils to discourage hard protection structures and promote the use of alternatives. It is also important to note that hard structures can be used if considered necessary. We are concerned that there is a lack of definition in what constitutes a hard structure. It appears that anything other than natural is deemed a hard structure, when in fact there are modern structures that are designed to repair and grow coastal areas, so they become naturally more resilient. We encourage CCC to not be limited in the evaluation of all options.
- **Keep managed retreat on the table.** The CCC list 5 ways to adapt to coastal hazards of which retreat is only one of five. We feel it inappropriate to list only one of the adaptive options- managed retreat, in the guiding principles as it has the appearance of prioritising one form of action over others. We don't believe that managed retreat is required by the NZCPS to be listed as a guiding principle in the fashion. The NZCPS states that managed retreat should be considered a risk reduction response along with other options. This principle could be reworded to say, "We will consider all options for managing coastal hazard risks."

- We are still unsure what your overall vision statement is for the Coastal Hazard Framework process. What is your Kaupapa? What are the benefits (a) for the residents, and (b) for the city? What do you hope is achieved from this framework?

We feel it would be important to have a vision statement that informs the direction and spirit of the framework process, so we are all on the same page. While we might not always agree on how to get there, it would be helpful to have at least our directions aligned somewhat. Perhaps you could ask the community what their vision statement would be. This might be a good exercise to see how far apart or close the parties are in their views.

Q- Is there anything you'd like to tell us about our proposed engagement and decision-making process?

- SSRA believes that elected members and CCC staff must ensure a decision is made, but they don't have to make every decision themselves.

To have this view confuses the actual decision with the leadership role of making sure a decision is made. Our personal experience shows that playing a more facilitative role typically enhances a community's respect for staff and elected members as community leaders. It also will normally strengthen a council or agency's 'licence to operate' as the community's trust increases.

- SSRA note that the CCC presentation includes comments regarding discussions with insurance companies. If CCC feel it is their place to have these discussions with insurance companies regarding coastal hazards, rather than just talking about insurance retreat, SSRA suggest that CCC should be encouraging solutions that would support the community. There are many examples in other countries where insurance is still available but have exclusions or higher excesses for specific events. There may be options such as a house relocation policy.
- We certainly acknowledge that CCC do not control the views and actions of the insurance companies. The CCC do however control the role they play and the views they put forward in these meetings.

Our preference is a solution-based approach to insurance. CCC may very well have discussed solutions at these meetings, but this solution information was not evident in the recent presentations where insurance retreat was portrayed as the primary insurance response.

Last comments.

This is SSRAs effort to contribute to, and to improve the engagement process.

Let's be honest, Southshore has been mercilessly spotlighted, over-analysed, over-consulted and at times over-regulated. It would be fair to say that many in Southshore have consultation fatigue. Unlike other communities this will not be their first CCC engagement experience. Given the failed past experiences, we view that the council will be starting this process in Southshore from a position of mistrust. This needs to be acknowledged, recognised, and the process needs to be entered into with empathy and patience. Openness, transparency of information, and community involvement in personnel procurement for any panels, experts, or non-experts, will be essential to any form of success.

Southshore has much to offer in terms of learnings gleaned from its varied unsuccessful engagement experiences. We encourage the council staff to recognise this, learn from it and allow other communities to benefit from this knowledge.

It is our view that the adaptation framework process has vast amounts of information for the community to digest and get to grips with. SSRA feel the CCC therefore needs to pause for a period, to allow communities the opportunity to catch up and gain a fuller understanding. We would not like to see a repeat of past processes where important coastal issues have been rushed through on council timetables and have moved far too fast for communities to absorb, question, and thoroughly understand. Rushing will only serve to leave communities behind. Instead, you must give them time so they can progress together with you.

We strive to keep Southshore vibrant and prepared for the future and hope our comments and experiences provide learnings for you and other communities who are just now being drawn into this work.

Our call to action

- **Slow down the process- allow communities to catch up**
- **Allow communities to feedback, question, clarify and understand the foundational technical information before its use.**
- **We do not see the need for wider city representation on the panels unless they have relevant or specific agreed expertise.**
- **Input from the community on Stag members and outside Coastal panel members**
- **Refine your Guiding principles**

We would like to point out that while this is the single submission of the SSRA it represents collective voices of our community which total over 500 households. On their behalf SSRA would like to be given the opportunity to speak to this submission

SSRA encourage the council to consider what best practice would suggest- **“nothing about us without us.”** He aha te mea nui o te ao? He tāngata!



Christchurch 6.12.2021

The following extract is from the 2021 CH-Report

Short-term erosion events	Events such as storms can temporarily remove sediment from the upper beach, often leaving a steep cut in the coast. This sediment generally returns back to the shore over time, rebuilding the coast. For these maps we assumed that the intensity and number of storms and short-term erosion effects remain the same as in the past, including the effect of any existing natural protection such as dunes and vegetation.
Sea level rise	<p>Sea level rise can have various effects on erosion, depending on the type of shoreline at a particular location:</p> <ul style="list-style-type: none"> • For beaches formed from loose silt, sand or gravel – material is eroded from the upper beach and deposited offshore, which can cause landward retreat of the shoreline. • For banks formed from compacted earth – sea level rise can increase the potential for wave-driven erosion, however as the shoreline retreats landward a shore platform or beach could develop which would dissipate wave energy and slow the rate of erosion. • For hard-rock cliffs without a shore platform – sea level has less influence and erosion is dominated by weathering effects.
Erosion protection structures	<p>At many locations along the Christchurch District coastline there are existing coastal erosion protection structures in place. There is a wide variety in terms of the type, construction, effectiveness, and current condition of these structures.</p> <p>For the 2021 CHA, known structures are shown on the hazard map for context, but the area susceptible to coastal erosion is calculated as if the structure was not present (based on erosion rates of nearby similar shorelines without protection). This allows the long-term importance of these structures to be considered as part of adaptation planning. It acknowledges they may provide some degree of protection against erosion now and into the future but also shows what could be at risk if they were to fail.</p> <p>The exception to this approach is for three sections of coastline where the natural shoreline has been significantly modified with land reclamation and hard protection structures – from Ferrymead to Scarborough, Lyttelton Port and within the Akaroa township. Because these shoreline modifications are so extensive and have been in place for so long, it is not feasible to use past observations to estimate what the long-term erosion rate would be in the absence of structures. In these locations the erosion hazard is mapped as the land immediately behind the structure which could quickly become unstable if the structure were to fail. If the damaged structure was not promptly repaired then the extent of erosion in the longer-term could be greater than mapped.</p>

Do you have any feedback on the Coastal Adaptation Framework?

Our submission relates to infrastructure in the flood and erosion assessment for South New Brighton.

Background – Promises

Our initial discussions on the stopbanks and groundwater issues for South New Brighton north of Bridge St were at a meeting hosted by SBRA and the current Christchurch mayor, Lianne Dalziel, then Labour MP for Christchurch East.

“SBRA Flood Management Public Meeting – 30 Oct. 13
Hosted by Christchurch East Electorate Office and
South Brighton Residents Association

Chair – Glenn Livingstone

In attendance: Residential Advisory Service (RAS), Canterbury Earthquake Temporary Accommodation Service (CETAS), insurance representatives – Southern Response, AA and SIS, VERO, EQC, CCC – Patrick Schofield, Nathan O’Connell, Mike Gillooly, and Paul Dixon (SCIRT)

Invitation: CanCERN Newsletter #104 - 18th October 2013

Flood Management, Floor Levels, Resource and Building Consents and Hazard notices - Invitation

South Brighton Residents Association with support from Christchurch East Electorate Office invites you to an informative meeting on Flood Management, Floor Levels, Resource and Building Consents and Hazard notices.

The priority for this meeting is to allow residents the opportunity to engage with CCC and ask important questions about the above so they can move forward on repairing and rebuilding their homes.

Attending will be speakers from the Christchurch City Council representing the Building Act, resource consents, and drainage/water. The information will be specific to the South Brighton and Southshore areas but anyone is welcome to attend.

We understand that many of you are at different stages of repair or rebuild and so will have many different questions that you need addressed. It is for this reason that we would like to gather a selection of 'broad questions' to be put to this group that they can answer as a whole, and then to break into groups later that can address more individual questions.

CERA and their associated support systems CETAS and RAS will be in attendance.

This will be a chaired meeting with speakers from CCC explaining their role within the Council then answering broad questions that the Residents Association has asked that is specific to our area. Residents will then be given the opportunity in smaller groups to ask any questions that are individual to their own situations.

Roy Stokes Hall, Central New Brighton School, Seaview Road, 7pm - 9pm, Wednesday 30 October 2013

Any questions you would like answered in the main discussion or if you require transport please forward to southbrightonra@gmail.com or laura.price@parliament.govt.nz or call Laura on 382 0288

At the above meeting, SBRA asked Council “Do stop banks constitute mitigation against flooding in relation to hazard notices?”

The answer from the Council representatives was: “Yes”

We also asked about groundwater: “Are CCC services going to be able to cope with higher ground water?”

The answer given was as follows:

“CCC will have to control excess ground water by pumping when that becomes an issue. At the moment there is not a ground water issue, but the solution would be to install some sort of pump station.”

Question: “Is SCIRT looking at ground water in terms of stormwater work?”

Answer: “It has to be taken into account.”

[Ref: Meeting notes provided by Leanne Curtis, CanCern.]

Council statements on the subject of infrastructure assured us that the stopbanks would provide mitigation and prevent hazard notices being issued. Council staff said that groundwater pumps would be installed to address any groundwater problems that might arise.

The groundwater pumps were then installed in the Bridge St reserve in a project referred to as PS229 Blake Street New SW Pump Station Detailed Design Report – SCIRT report reference 11070-DE-SW-RP-0001

Stopbanks

In a Newsline issue from council of 7 July 2021 following a risk assessment of the stopbanks in South New Brighton, the following statement was made by Helen Beaumont:

“The Council is planning to replace the current stopbanks as it implements the Ōtākaro Avon River Regeneration Plan, but in the interim they need to be maintained and managed.

We check the stopbanks for any damage or signs of erosion every year and after a flood or a significant earthquake. We also regularly monitor the height of the stopbanks and top up any low points.

We’re planning for a future with increasing sea levels and more extreme weather events so when we do build the new long-term stopbanks, they will be constructed to a higher design level than the existing stopbanks.”

Our Submission

So, assurances were given that the stopbanks would provide protection. We see no reason why this infrastructure has been excluded from flood hazard mapping for South New Brighton, while council-owned infrastructure is included as mitigation for flood hazards in areas such as Ferrymead to Scarborough, Lyttelton Port and within the Akaroa township.

We therefore request that the promises made that Council infrastructure would mitigate any hazards be kept, that the infrastructure in question be included as a hazard mitigation component in the 2021 CHA and that the hazard mapping be corrected accordingly. Otherwise, these omissions will have an enormous impact on planning overlays, flood and erosion mapping.

We have submitted on these issues for many years yet little action has been taken on the concerns we raised. The latest approach by the council of simply ignoring key council infrastructure and removing this component of residential property protection without any explanation or consultation is totally unacceptable.

South Brighton Residents' Association

Hugo Kristinsson

Chair

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Christchurch 8061

New Zealand

Subject: CanCERN Newsletter #104 - 18th October 2013
Date: Friday, 18 October 2013 at 4:55:26 PM New Zealand Daylight Time
From: Leanne Curtis <leanne@cancern.org.nz>
To: Leanne Curtis <leanne@cancern.org.nz>
BCC: hugo@absolute-proof.com <hugo@absolute-proof.com>



CanCERN Newsletter #104 - 18th October 2013

“Courage is what it takes to stand up and speak,
Courage is also what it takes to sit down and listen.”

- Sir Winston Churchill

Dear Members

Well we have a new Christchurch City Council and they're a happy and motivated looking bunch. This week's quote seems good advice to the incoming councillors and we very much hope they action what they wrote and spoke during the campaign. Let's also hope they have the courage to sit down and listen with open ears to the people who got them there and the people they have yet to win over.

Lianne's response was unfortunately missed from previous newsletters so we have published it here so you can understand Lianne's position.

One of my primary reasons for running for Mayor is my belief that we must embed CanCERN's founding principles into the recovery at every layer of decision-making. Sir Peter Gluckman essentially said in his report to government only 3 months after the Feb 2011 earthquake, that empowerment was the only effective antidote to the disempowering effect of the earthquakes. Failing to include communities in the decision-making, withholding vital information and making major shocking announcements about land and schools with no prior preparation have been the ingredients for a recipe that has resulted in a disaster upon a disaster. As I have made clear in all my statements since I announced my intention to run, I will engage our diverse communities by:

- *developing a sounding board of business, NGO and community representatives to strengthen the governance role of the council through its committees and the community boards;*
- *increasing the responsibility of community boards to make decisions about their priorities with their communities;*
- *developing a model of participatory planning that educates communities about the hazards they face in their communities and engaging local knowledge to plan for and mitigate risks;*
- *Using the representation review as a grassroots-up exercise in defining communities of interest for electoral and planning purposes, based on a strengths-based asset model of community development.*

Community representatives, like CanCERN and the Chamber of Commerce, will be asked to define the attributes they would like to see in a new Chief Executive for the Council. I personally think that relationship-building will be vital to re-establish the trust that has been lost over the years. The new Chief Executive's KPIs will reflect the 5 principles CanCERN has set out for our consideration. I would like to have regular meetings with CanCERN, which I would also like to ask to regularly report to the new Earthquake Recovery Committee made up of all councillors, which I will chair as Mayor.

There are those who believe that consultation slows things down. It may take longer in the short-term but it often saves much more time in the long-term as there is buy-in, people tend not to go to court and the solutions are more durable.

Great words from our new Mayor and CanCERN is certainly keen to ensure the key principles we have outlined are deeply embedded into the culture of the Council. Congratulations also to the elected Community Board members. Your job is vital and hopefully under the new Mayor's leadership, about to get a whole lot more meaningful within the community. Let's look forward to establishing a meaningful and robust working relationship with Mayor Lianne Dalziel, the new Council and Community Boards and also the staff of the Council because we are sure waiting for the change of openness and access to happen.

Have a great week.

Kia Kaha Everyone.
The CanCERN Team

CanCERN SPRING Campaign Progress Update

	Referrals Received	Awaiting Assessment	Referred to CEA 'Make it Right'	Referred onto Support Service	CanCERN / Community fixed/processed
Week 1 - 12	43	1	18	4	18
Week 12	no current updates				
Total					

South Shore Door Knock

	Door knocks	Survey form complete	Not Home	Survey declined	Needing follow up action	In follow up process	Support info left	Referred to CEA 'Make it Right'	Directly referred to RAS or other supports	CanCERN Community fixing
Wk 1	300	72	151	22	20	4	3	1	4	6
Wk 2	95	17	62	11	9	3	5	1	2	3
Wk 3	145	32	74	12	17			1	3	14
Wk 4	no	current	updates							
Total										

Make it Right Progress - CanCERN Spring Campaign works in conjunction with the CERA Winter Make it Right (WMIR) programme. Canterbury Energy Action (CEA) manage the WMIR programme from a repair point of view. We would like to acknowledge the commitment CEA have shown to improving the living conditions of families and give a special thanks to Ian McChesney for his great efforts and the wonderful collaborative work

he is doing with our Bob Henderson.



Do you have to wait until someone knocks on your door to get help?

No. If you, friends, neighbours or family are living in a home that feels **unsafe, unhealthy**, or just too hard to **warm up** you can fill out the CanCERN form - [found here](#) - Enter your details, or the details of someone who may need help (please note that you need their permission) and with this information we can make contact with you and talk about the next step. This is a free service - if we can patch your house up to make it weatherproof and safe before final repairs or rebuilds are done, we'll get it done without the job risking your temporary accommodation cover or final settlement.

*CanCERN's involvement in this campaign is made possible because of support from the Tindall Foundation and Family and Community - Anglican Care, NZ Sharp Corporation.
(This campaign works in conjunction with the CERA-led 'Make it Right' Campaign)*

In this newsletter you will find...

- Mayor Lianne Dalziel's Response to CanCERN Principles
- CanCERN Spring Campaign and CERA Make it Right Update

COMMUNITY EMPOWERMENT

- Community Questions and Issues - [New Questions Uploaded](#)
- Letterbox Project
- Tune into TEDxChristchurch tomorrow
- Women's Voices – Photos and videos
- Spring River Festival - Saturday 2 November
- Christchurch Training 1/2 day workshops
- Working Together More Fund!

COMMUNITY PRIORITIES

- CanCERN Flood Issues Focus Group
- Successful stormwater management in the Avon/Ōtākaro catchment
- Flood Management, Floor Levels, Resource and Building Consents and Hazard notices - Invitation
- When an Insurer Offers Cash - Duncan Webb Opinion
- Tower Progress Updates
- A Message from EQC - Rolleston and Middleton EQR Hub

Notices

- [What is being organised in the community?](#)
- Important Links & Community Funding Information

COMMUNITY EMPOWERMENT

Support our community leaders so they can strengthen the member groups and lead recovery in their communities

Community Questions and Issues - [Did you read the recently updated questions?](#)

Five new questions have been uploaded. We expect responses within the next couple of weeks. Remember, if you keep hearing the same question going round the community and there is no clear answer, put the questions in the [online form](#) and keep checking the [updates found here](#) on the Canterbury Residential Rebuild website. Also look out for [these booklets](#) in your local library and send us your ideas about where they should be or how they could be better. (info@cancern.org.nz)

Letterbox Project

Volunteers will be out in the Avon River Residential Red Zone on Sunday 'harvesting' letterboxes with CERA's consent. These are for commemorative sculptures.

If you are an ex-red zoner and wish to be involved in the design of these sculptures, please contact evans@qegroup.ac.nz

Tune into TEDxChristchurch tomorrow

TEDxChristchurch 2013: Curiouser and Curiouser is tomorrow, 19 October, and you're invited you to watch the live online broadcast. Check out the public [viewing parties](#), sign up to host your own, or [simply watch online](#) at your leisure.

Send us your pictures. We would love to share your viewing party with the audience at the Aurora Center. Email your pictures to rosaria@greenhorn.co.nz by 1pm so we can include them in the show!

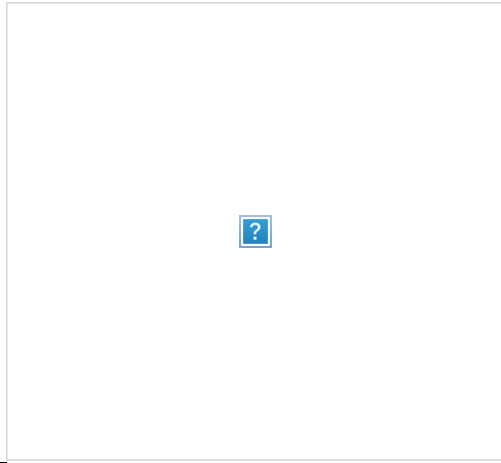
Women's Voices – Photos and videos

A blog about updates to the Women's Voices archive on UC CEISMIC has just been posted on UC CEISMIC – please click <http://www.ceismic.org.nz/news/women's-voices-photos-and-videos>

Women's stories about their earthquake experiences are available through UC CEISMIC in an oral history archive generated by the Christchurch Branch of the National Council of Women of New Zealand (NCWNZ). Interview summaries and sound files of recordings have been stored in a [NCWNZ Women's Voices Collection](#) in the UC QuakeStudies repository since December 2012. Now photographs and some edited videos of interviews with women who told their earthquake stories have been added to this collection and will also be available to the public.

The photographs and videos are the work of four students enrolled in the [College of Arts BA Internship Programme](#). Students in this programme work with community and business organisations (in this case the Christchurch Branch of NCWNZ) on projects using skills they have acquired in their university studies. Three photography students, (Chrissy Kouwenhoven, Bayley Corfield and Elise Rutherford), and one student studying Art History, Media and Communication (Georgina Tarren-Sweeney), produced these visual additions to the Women's Voices archive during 2013. They have donated their creative work to the UC CEISMIC archive.

Spring River Festival - Saturday 2 November



Timetable of Events

- 7.30am River walk - Cambridge Green to Gayhurst Bridge
9.15am Waka Journey to Kerr's Reach
9.30am Official opening and welcoming of the Waka Huia
9.45am Flat Water Regatta at Kerr's reach
10 - 2pm Carnival Market at New Brighton with kites and sand-painting on the beach
- 11:54am Flotilla heads downstream to Owles Terrace
12.30pm Journey from Owles to New Brighton
1 - 6pm Family Concert, New Brighton Water Front (Free) featuring the Stone Cold Chillers, 1 Drop Nation and Natural Magic Ukulele Pirates, plus others.
8.30pm Concert at the Pierside (Cover charge)

<http://www.springriver.org.nz> for more information or follow updates on facebook

Christchurch Training 1/2 day workshops - Skills for Collaborative, Constructive Discussions - 25-26 Nov

These half day interactive training sessions are particularly useful for people involved in discussions aimed at achieving mutual gain for people with diverse or conflicting points of view. Each session provides opportunities for practical application of techniques relevant to cases you are dealing with. Maximum of 12 participants per session.

Session topics:

- Setting up collaborative discussions to encourage success
- Skills for talking assertively and collaboratively
- Skills for turning conflict into a collaborative atmosphere

The trainer, Gay Pavelka, has worked with business, councils, government departments and community organisations involved in contentious situations and resource management since 1987. She is experienced in mediation and in facilitating community discussions aimed at gaining agreement on public issues. The workshops use approaches that have proven to be effective in New Zealand.

[Full information and registration here](#)

Working Together More Fund!

The Working Together More Fund (WTMF) was established to help groups wanting to work together to achieve greater results for our communities... ..as the name indicates, working together more can achieve great things to help deliver better quality, more convenient or a greater number of services for our communities. NGOs considering a collaborative project, merging or working with others to improve services are invited to visit www.workingtogether.org.nz to read about the fund, view some case studies and check fund criteria. You may also find the details of successful applicants there which illustrates the types of grants being supported.

Note the closing date for the next round is 1 November 2013. Further enquiries to Bede Martin (bedemartin@xtra.co.nz) or call Bede 021 230 2908.”

COMMUNITY PRIORITIES

Identify priority areas and set actions and outcomes that support residents and communities and progress objective

CanCERN Flood Issues Focus Group

Thanks to all of those who turned up and participated in this session. It was a good reminder that the issues relating to the flood management area are broad, diverse and complex and people have their own specific area of interest, priorities and solutions. That will be number one statement made to the planners of the communication plan!

We have many, many sheets of paper to work through to make sense of what the priority areas are, what the confusions and contradictions are and what the questions and issues most consuming residents are. Once we have put this together we will be asking you, the resident to add to, challenge or confirm what has been gathered. We are also gathering questions and concerns (and solutions) already gathered by other groups in the community and adding it to the information as it is important to make this communication plan as comprehensive as possible.

Next week a smaller group are meeting to look specifically at the methods of communication that will be necessary to reach the different target audiences. We will also be trying to identify which agencies need to coordinate their information so that everyone has a mutual understanding of what is happening, what people are being told and what the unresolved issues are that need attendance.

"Successful stormwater management in the Avon/Ōtākaro catchment: CWMS and the draft Avon/Ōtākaro SMP"

I attended this workshop this week really out of my knowledge depth and surrounded by much more knowledgeable people than myself - a little intimidating to say the least. However, many in the community have identified that the stormwater planning is a priority so it seemed I should go and learn something.

Christchurch West Melton Zone Committee will be giving feedback to Christchurch City Council during the development of the draft Stormwater Management Plan (SMP) for the Avon/Ōtākaro catchment. The Zone Committee will be assessing how the draft SMP will help to implement the Canterbury Water Management Strategy (CWMS) in the Avon/Ōtākaro catchment.

That sounds confusing but essentially the workshop was looking at desired end outcomes for the Avon/Otakaro River and what needs to be considered and planned for to ensure the end outcomes come to fruition. Everyone seemed to agree the river needs to be people focused - clean, healthy, a place of recreation (some even wanted to be able to drink it!)

From an uneducated perspective it was encouraging to see that the CCC staff were fully aware and knowledgeable) about the areas we in the community are concerned about - Flockton Cluster area, South New Brighton, etc.

The issues with creating the SMP as I see it will be the tension between addressing the issue well and addressing the issue quickly. We still have a silo way of working and yet the discussion was very integrated and it seems you can't get to the end result without taking into account the people, the behaviours of people, the natural ecological environment, the built environment, new development planning processes and of course, the mechanics of filtering water and getting it from the home to sea. Not a small job.

I'm attending part 2 of this workshop in a few weeks so will try to make more sense of how the SMP will be developed and implemented and the implications for residents now and in the future although that learning curve may be a little steep for one session.

Flood Management, Floor Levels, Resource and Building Consents and Hazard notices - Invitation

South Brighton Residents Association with support from Christchurch East Electorate Office invites you to an informative meeting on Flood Management, Floor Levels, Resource and Building Consents and Hazard notices. The priority for this meeting is to allow residents the opportunity to engage with CCC and ask important questions about the above so they can move forward on repairing and rebuilding their homes.

Attending will be speakers from the Christchurch City Council representing the Building Act, resource consents, and drainage/water. The information will be specific to the South Brighton and Southshore areas but anyone is welcome to attend.

We understand that many of you are at different stages of repair or rebuild and so will have many different questions that you need addressed. It is for this reason that we would like to gather a selection of 'broad questions' to be put to this group that they can answer as a whole, and then to break into groups later that can address more individual questions.

CERA and their associated support systems CETAS and RAS will be in attendance.

This will be a chaired meeting with speakers from CCC explaining their role within the Council then answering broad questions that the Residents Association has asked that is specific to our area. Residents will then be given the opportunity in smaller groups to ask any questions that are individual to their own situations.

Roy Stokes Hall, Central New Brighton School, Seaview Road, 7pm - 9pm, Wednesday 30 October 2013

Any questions you would like answered in the main discussion or if you require transport please forward to southbrightonra@gmail.com or laura.price@parliament.govt.nz or call Laura on 382 0288

When an Insurer Offers Cash - Duncan Webb Opinion [Original here](#)

My insurer said that my house is a repair and that they would start repairing it some time next year. However, now they are saying that they want to pay us the cash and we repair it. We would prefer that they repair the house as we don't really want to manage a repair project. We are also not sure that the amount they are giving us will be enough to pay for all of the repairs.

Most insurance policies give the insurer a number of choices. One of those choices is to either undertake the repair themselves or to pay for the cost of repair. You should read your policy and find out what the insurer's rights are. One common policy says that the insurer can choose whether to "repair your house to an 'as new' condition" or "pay you the cash equivalent of the cost of repairs". In light of this it is probable that your insurer does have the ability to pay cash rather than undertake the repairs themselves.

It is really important to note that when the insurer chooses to pay cash it is not a right to "pay you the cash equivalent of what our experts consider our builders could have affected the repairs for". Rather it is an obligation to pay the cash equivalent of the actual cost of repairs. Applied strictly this means that you should get the repairs done and then you should provide the insurer with the invoices and they will meet them (either by paying you or by paying them directly).

Of course this is not what insurers tend to do. Rather they pay a cheque for the sum that they estimate that their builders could have done the work for. The problem with this is that it is very likely that the builders that you have to retain will be more expensive. Further, insurers tend to pay cash to get repair claims off their books. The fact is that they will not be able to get around to all of these repairs for a long time. Over that time prices will

inevitably go up. By paying you cash now the insurers shift the risk of any price increases to you.

Further, when the insurer seeks to cash settle it tends to do so based on the damage assessment and scope of works of its own professionals. However, the principle underlying an insurer paying for the cost of repairs is that the control of the repairs is given to the homeowner. The insurer cannot both pay cash and control the repair - that is having its cake and eating it too.

Of course, the homeowner must act reasonably and cannot start improving undamaged parts of the property. However, as long as proper advice is taken and the costs incurred are reasonable the insurer ought to pay on the basis of the homeowner's experts not their own. If the insurer wants to control the repairs then they should undertake them itself.

In most cases when an insurer cash settles it will require the signing of a settlement agreement that states that you accept the sum in full and final settlement. Be cautious in doing this as what you are agreeing to may be outside of your strict policy entitlements. However, there may also be good reason for taking a cash payment which is not strictly in accordance with the policy terms. You may want to undertake only some of the most needed repairs and leave unimportant stuff for later (or not at all). Or you may want to undertake the repairs yourself and save the money for other things. All of these may leave both you and the insurer better off - but make sure you know what your rights are.

Duncan Webb is a partner at Lane Neave lawyers. Email questions for him to legal.questions@laneneave.co.nz.

Tower Progress Updates

Tower has been posting progress updates for about 4 months now but it seems it is not well known or the easiest to find on the website as they have had very little response. The progress data on the TOWER website can be found at <http://www.tower.co.nz/company/canterbury-earthquake/> - currently it has the progress at the end of September 2013, and is usually updated one week into the new month. Tower's comment: "We are reasonably happy with our progress, with 73% of all claim types settled and closed, 68% for house claims only, but there is still plenty of work to do."

If you have any feedback you would like CanCERN to pass onto the Earthquake Recovery Manager please email leanne@cancern.org.nz and we will pass it on.

A Message from EQC - Rolleston and Middleton EQR Hub

Staff at the Middleton and Rolleston Hubs will be relocating to a larger new site: Blenheim Hub. Phone numbers and emails that you may have been using to communicate with them will remain the same. If you would like to make an appointment to talk with hub staff the new address is:

526 Blenheim Road
Telephone: (03) 341 9955

We are making the change as part of a review of operations to improve customer experience by having larger teams work together. There will be no change or delay to repair work as a result of this move. You will be able to find contact details and a map on <http://www.eqr.co.nz/contacts>

If you have any questions at all please talk to your Contract Supervisor, or you can email queries@eqr.co.nz

NOTICES - NEW UPDATES on the link

What is being organised in the community? - Check this link out weekly for information and updates about what's happening in the community, by the community and for the community - community events, workshops, public meetings, regular drop ins, markets and more.

You can also find out who to go to in the local community for some tried and tested advice.

Important Links & Community Funding Information - [Click Here](#)

Please support us - if it's come from our newsletter, please add a note identifying that. - our logo can be copied from the top of the page

If you would rather not receive this newsletter, please let us know so that we can take you off the list.

CanCERN would like to acknowledge the ongoing generous support of our funders

[The Todd Foundation](#) [The Tindall Foundation](#) [The Hugh Green Foundation](#)



To see our other sponsors please go to our web page or [click here](#)

SBRA Flood Management Public Meeting – 30 Oct. 13
Hosted by Christchurch East Electorate Office and
South Brighton Residents Association

Chair – Glenn Livingstone

In attendance: Residential Advisory Service (RAS), Canterbury Earthquake Temporary Accommodation Service (CETAS), insurance representatives – Southern Response, AA and SIS, VERO, EQC, CCC – Patrick Schofield, Nathan O’Connell, Mike Gillooly, and Paul Dixon (SCIRT)

(insurers asked to attend as listeners and observers rather than presenters)

CCC Presentation – Floor levels in residential homes in Christchurch Guidance ([add link to digital presentation here](#)). Hard copy of presentation available)

(RMA – Resource Management Act) - City Plan requirement in FMA is 1:200 year flood.

Building Act in Flood zones is 1:50 year flood and freeboard (400mm).

RMA and Building Act overlap each other. RMA generally only concerned with building height. Building Act concerned with building height and land.

If you can’t control or mitigate the flood to land (can work it put on CCC webpage) you are likely to get a hazard notice that is put of Certificate of Title to the Land. This doesn’t happen automatically but comes via resource consent application and has to be signed by homeowner and others ([clarify this point – Patrick presenter](#)).

There is a tolerance of 400 mm of flooding to land where a hazard notice wouldn’t be applied. If you are close to or more than 400mm then a hazard notice under Section 71 to 74 of the Building Act 2004 may apply. There is a map which shows the areas of flooding of more than 400mm although hazard notices are applied property-by-property depending on the specifics of the site.

If you are planning to rebuild in FMA or Flood Zone - can go to CCC and get all hazard information they hold on your property (PIM).

Nathan

- If you are a repair under the City Plan you are not subject to the City Plan rules
- Existing Use Rights (EUR) – only applies to the City Plan and RMA, not the Building Act.
- Last financial year there were approx 300 EUR applications granted. Legislation not designed for rebuilding a city but has come to the fore since the quakes. There are problems with this use.

Questions:

Stop Banks

What are the plans for the current stopbanks?

Will stay there for sometime until there is clarity around the future use of the red zone. They are there to protect houses from the tide. The long term future is that stop banks will continue to protect this area but probably in a different

place. They are monitored 2-3 times a year because they're on unstable land and subside.

Are they going to be improved?

At this stage, no

Are they going to be maintained?

Yes. There is currently no intention to make them more user friendly because of where the budget needs to be applied which at this stage is focused on maintenance.

What is SCIRT doing?

Return the drainage to a level of service on road that it was before the earthquakes. (On road is about making sure ponding which could be a hazard is mitigated).

Engineers have decided that if pipes are fixed and not withstanding tidal flooding, the level of flooding will be very similar to pre-earthquake levels. Isolated areas of ponding and localised subsidence are more likely to flood.

In terms of dealing with stormwater in South Brighton

- Install improved check valves
- Larger diameter pipes able to carry more flow
- Polythene pipes so more resilient

Are there plans for changing valves which cause flooding monthly around Kibblewhite St?

Yes. Outfall pipes may be raised above river level and they intend to install rubber valves in Southshore because they seal more successfully than the steel flaps. Might be starting before Christmas this year and the work continues for approx. 6 months.

What about protecting against flooding in Owles Tce?

Plans are not as advanced as Kibblewhite St but it is being developed and will probably include a pump station as resolution.

Do stop banks constitute mitigation against flooding in relation to hazard notices?

Yes

Are CCC services going to be able to cope with higher ground water?

CCC will have to control excess ground water by pumping when that becomes an issue. At the moment there is not a ground water issue but the solution would be to install some sort of pump station.

Is SCIRT looking at ground water in terms of stormwater work?

It has to be taken into account.

There is an increased risk of flooding as a result of the earthquakes yet CCC seems to put onus on property owners to mitigate against flooding yet CCC seems unable to provide mitigation on CCC property. Insurers then can stop offering flood cover. CCC admits there are many factors that are leading to an increased risk of flooding. Why do homeowners have to provide all the mitigation?

A range of issues raised:

Building Act and RMA are trying to mitigate against global warming and now stop banks are added to mitigate against flooding caused or exacerbated by the quakes.

Really talking about land damage – no existing solutions to increased risk of liquefaction and increased risk of flood.

Questions of planned retreat

Is it in the CCC's Long Term Plan that there will be retreating from the Estuary and should we be addressing this now before too many people have repairs/rebuilds completed? Should we be retreating from the areas with high risk of repeated flooding?

Sea level rise has to be considered (approx. 1 metre by 2115). The Tonkin and Taylor report commissioned confirmed what was known rather than providing new information. In 2003 the council brought in Variation 48 to start thinking about sea level rise from global warming. Community were engaged – 3 options: avoid it, mitigate against it or adapt. The community chose adaptation. The question now has to be asked if the timing was too early and needs to be back on the table again in light of earthquakes and new information.

The floor level (City Plan) is set against predicted sea level rise.

What's the relationship between Cat 9 damage and any land remediation that may have to happen and the hazard?

Building Act, EQC Act, etc don't necessarily work together. Hazard Notices are property specific.

Land damage is site specific, not area-wide. All of the information gathered is area-wide (drilling points analysed to infer damage in between) but it goes to inform a site specific reading. All information goes into a model and drawn together to inform specific picture.

What is the timeframe for people knowing about land damage? (Question to EQC)

Claims will be settled by the end of 2014. EQC are still gathering data about increased risk of flooding and the Tonkin and Taylor report is helping to inform that.

Most people categorised as Cat 8 or 9 won't be cash settled this year. As it stands today, no one in Canterbury is confirmed Category 8 or 9. Anyone told has only been told potentials – emails, etc. If the final data challenges this potential risk, EQC is informing people of that change.

Some people are confused because EQC has said they have land damage with regard to increased risk of liquefaction (not category 8) but they are also told they need specific TC3 foundation designs because their land won't support a structure without it.

Many people had liquefiable soils before the quakes. Land damage as interpreted by EQC is an increased risk of liquefaction meaning the crust has thinned as a result of earthquake related land damage. Thinning of the crust is assessed via Lidar data. So although you may have a risk of your land liquefying in a future event, you don't have EQC land damage if the risk is not greater than it was.

What is a general insurance response from insurers to future insurance on a house with hazard notice. (Upload this question to Community Questions and Issues)

In general insurers look at the specific policy in terms of what risk they want to take on so this is not solely a flood risk. There is precedent in NZ around insuring in areas of high risk (flood, etc). Insurance industry found solutions in Queenstown.

How can insurers use EUR (which then doesn't trigger the City Plan levels) but triggers the Building Act levels instead? How can CCC allow this to happen?

If someone comes to CCC and asks for the project to be done under EUR the CCC has to process application on its merits so may agree to EUR.

Does property owner have to agree?

This is a conversation that has to be had between insurer, PMO and homeowner but essentially the PMO becomes the agent acting on behalf of the homeowner (in terms of fulfilling build responsibilities).

Lianne Dalziel

The CCC operates within rules they are not responsible for and opportunities like this are helpful for people to understand in simple language but also for agencies to hear the questions that we need to find answers to.

Are the current rules fit for Canterbury's rebuild purpose? No. They are too siloed and the rules don't line up. We do need to have some hard conversations about where we go to from here. The District Plan is part of the Land Use Recovery Plan but CCC need to ensure the flood levels are addressed in the plan. CCC will be working with all agencies and will play a leadership role.

The start is an education programme and engagements like this are the beginning of that education process.

Submission 44077



Christchurch City Council

6 December 2021

c/o 286 Keyes Road

Christchurch 8083

Re: Submissions

Coastal Adaptation Framework

Issues and options paper for coastal hazards plan change

The New Brighton Pier and Foreshore Society

The objectives of The New Brighton Pier and Foreshore Society that are relevant to this submission are to promote and assist in the promotion, enhancement and well-being of the New Brighton Pier and the improvement of the foreshore, and by united action secure the co-operation of any other Societies, Public Bodies and Citizens to assist and promote any movement, idea, suggestion, or enterprise which in the opinion of The Society will enhance the New Brighton Pier, the foreshore area, and the general district of New Brighton (South, Central and North), and by so doing, build a sense of community.

Our membership is comprised of local residents, land and business owners.

The focus of our submission

The focus of our submission is to request further time in which to engage with our community around a process that so far has been too hasty. Most people are totally unaware of this current consultation. The subjects at issue (Coastal Adaptation Framework and Issues and options paper for coastal hazards plan change) have far too significant immediate and long-term ramifications for communities not to be widely understanding of them and fully engaged in the process. In order for the situation to be remedied we request the process be halted and a co-creation process designed in consultation with community representatives and Council.

We are copying this submission across both consultations as we believe they are interrelated.

We also make the following comments.

Coastal Adaptation Framework -

- 1) While we support much of the Framework we believe that there is unnecessary inclusion in the principles of 'Keeping managed retreat on the table'¹. The content covers this option

¹ Coastal Adaptation Framework - Page 11

along with others. How necessary was it to state this? Giving this option precedence in this way gives the impression that it is the preferred option. It is unnecessarily distressing.

- 2) The Coastal Panel. The suggested makeup of this panel whereby local representation is heavily outweighed by non-locals is disempowering of the community, patronising and dismissive of local expertise.
- 3) The STAG panel. Local people would like fairer representation of locally identified and suitably qualified experts.
- 4) The wellbeing of the community has largely been ignored in this document. It must be factored in. See the presentation by Dr John Cook to CCC 2019 <https://www.youtube.com/watch?v=-3wT8OiBPWw> Since then, community wellbeing has been further compromised by COVID19.

Issues and options paper for coastal hazards plan change

The way in which this issue is managed has the potential to either showcase Christchurch as an example of 'how not to manage this process' or 'how to'. We would prefer that despite a false start we can chart a better course of HOW Council could work with communities to better address our common concerns and differing needs. We understand there are tensions between the two.

- 5) The New Zealand Coastal Policy Statement actually allows for a greater scope of options than has been presented to the community by the Council. It's equivalent to knowing we could choose between lollies or ice cream and only being offered lollies.
- 6) We believe further modelling needs to be done especially for the middle timeline period. Using limited data points especially those of long-term projections is akin to designing an airport for 100 years into the future.
- 7) While peer review may have been done, it has been done by parties that work closely together to the point where we understand some people have been employed at various times by both. This is not truly independent. We understand the scientific community in New Zealand is small, however international peer review is surely possible.

This process has been 'top down' despite the intentions to do otherwise. If true community engagement happens, the community will own the process and outcome.

We wish to speak to our submission.

Stewart McNeice

CHAIR

Submission on Proposed Coastal Adaptation Framework

Thank you for opportunity to respond to your consultation exercise. We would like to thank The Council for their early engagement with communities and organisations such as ours. Although arguably the issue is one of the most important in our lifetimes, we understand and appreciate some of the extra effort that this has cost you. Thank you.

For us, (BOEE), we are interested in how we adapt locally and nationally to climate change. The proposed process is (nationally) is probably the first 'at scale' process in NZ for a major city. Additionally, Christchurch is early "off the blocks" with their adaptation process, so others will be watching. Therefore, how this adaptation process is run and what lessons can be learned from it (positive or negative), potentially has implications for the rest of the country as local governments nationwide think about their own adaptation plans and processes. We understand the importance of having coastal hazards appropriately part of the District Plan and will submit separately on the proposed The District Plan Changes (Coastal Hazards). We will not further comment on DP aspects here.

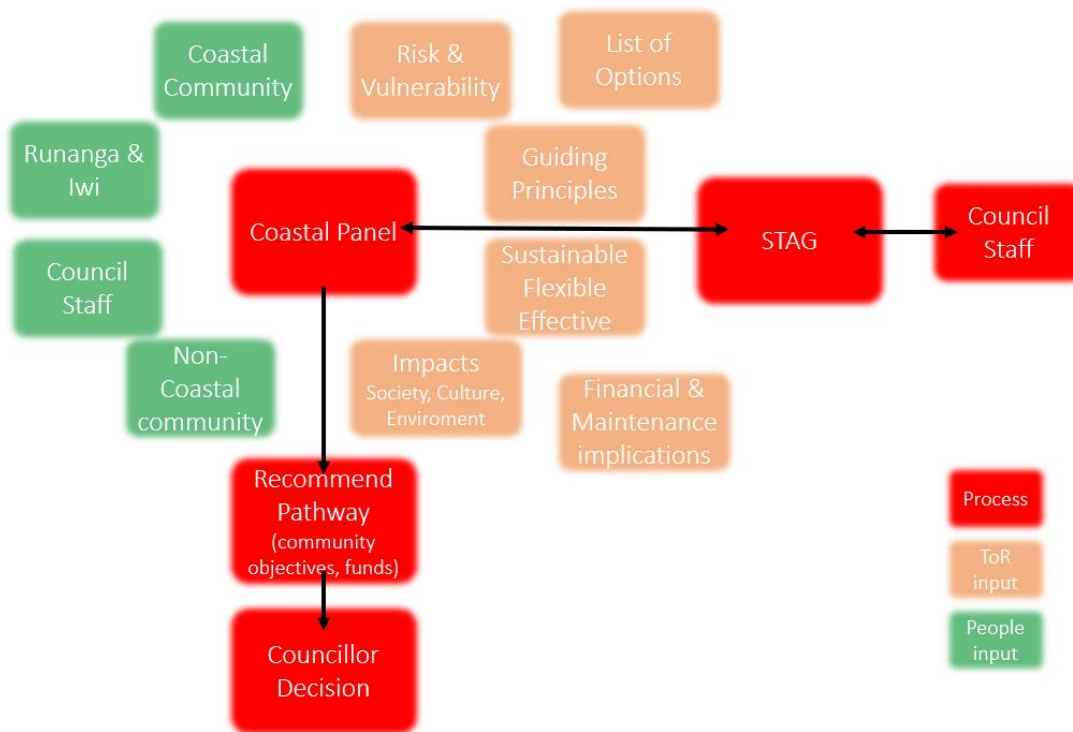
Finally, one of the reasons for the existence of BOEE, (and this submission), is to moderate the information and power inequality across the adaptation process, *i.e.* between councils and communities. These submissions take significant time to produce and have to be fully referenced to be valuable. Accordingly, in the spirit of transparency, we would like to know, consistent with the definition¹ of 'consultation', how this submission changes the approach and content of the proposed Coastal Adaptation Framework.

Context and Introduction

We recognize that these conversations will never be easy whenever or wherever they take place. The aim is not to make them popular, but rather make sure they are informed and inclusive, and crucially ensure that their outcomes are the best they can be for all participants. These outcomes are likely to affect and effect the form of our future regional economy and society, and it is difficult to overstate their importance. There is also an 'elephant in the room': of course, this is the critical first round, or the start of the conversation. However, there will need to be regular future rounds of this conversation indefinitely to encompass material environmental changes.

The proposed process (derived from documentation and website) is described below. Arrows and red indicate process, inputs are green (people), and orange (terms of reference).

¹ Consultation: promise to the public, "We will keep you informed, listen to and acknowledge your concerns and aspirations, and provide feedback on how public input influenced the decision." <https://www.iap2.org/page/pillars>



These processes have not been undertaken before (at scale) in New Zealand, so to a degree (not a criticism), we suspect that there are a number of key process issues which are either unknown or unresolved at this stage. Hence we suggest during the first engagement (Lyttleton), there will be a number of learnings that will directly affect subsequent engagements. It is also worth saying that thus far in the talking to communities about the process, it is difficult to see many ways in which council staff could have done more.

The proposed process, (in fact given the context *any* proposed process), raises or would be likely to raise a number of issues. However, in this submission we will engage only two: The machinery of the process and the timing of the process.

In terms of the data underlying the Risk and Vulnerability analysis that is being used to inform this process, as in our other submission on the DP changes, we will not address here the degree to which the data are sound, nor whether it has been correctly interpreted. The one exception to this is the ground-water data². We concur with Dr Helen Rutter, the lead author of the latest groundwater report that it is not possible to use existing data (data density, temporal extent of

² The most recent groundwater work, Rutter H. (2021) LDRP45: impacts of earthquakes and sea level rise on shallow groundwater levels (Aqualink), has highlighted that largely we do not have enough information or the correct data. From the preface of this report: "The purpose was not to accurately define the shallow groundwater hazard at a local scale, but rather to provide a high-level assessment at the city-wide scale." Hence this information is not fit to inform local suburb-based adaptation.

data, and the type of data collected), to support local or suburb scale work of the nature envisaged.

The climate and hazard portal is very accessible, and again (with the exception of the groundwater aspect), it is again difficult to identify what more council staff could have done to make this information accessible.

Our regional and national economies are not broad or deep enough to destroy value, capitals and resources *pell-mell*. Yes, some value will be lost and some will be created in any adaptation process, but if we do this right then more capitals will be created than are lost, although potentially not strictly like-for-like. Hence focus on location and time-scale is crucial, so that processes are not needlessly restrictive, nor in place too soon/late. These are key and are the difference between the continuance and wellbeing of communities: whether they prosper while they can or instead are slowly strangled or forced to leave too soon or in a way that is climate unjust. In this latter situation it seems to us that most of the economic cost will not fall on Council, (inclusive of the costs of any potential property payout scheme that may be developed).

The Machinery of The Process

We appreciate the need of both The Council and the coastal residents to understand the situation in which they find themselves, and if the conversations are effective, both parties will have a deeper and more nuanced understanding of the nature of the issues anchored in specific locations. This is probably one of the key aims/desired outcomes of the conversations.

We see four issues in the framing of the process:

1. The role of The Council: On the basis of the process, the roles and responsibilities of the Council in this process seem incompletely described.
 - While it may be the case that Council is only formally responsible for public infrastructure, and that private property owners are responsible for their own property, I would be rather surprised if that satisfied The Council's obligations under the Local Government Act to support resident's and community well-being. Particularly (as in this case) that the situation is not one of resident's foolishness or omission. This is a national problem and Christchurch is only one part.
 - From the three legal opinions commissioned on issues around adaptation to climate change³, LGNZ is of the view that as the law currently stands, in fact local government are responsible wholly or partly for the liabilities of their residents in this situation. Possibly you have a different (legal) opinion?

³ For example: Climate Change litigation – Who's afraid of creative judges?. <https://www.lgnz.co.nz/our-work/publications/climate-change-litigation-whos-afraid-of-creative-judges/>

- It is understood that a number of significant parts of the legal landscape are changing with the repeal of the RMA, however, because NZ is a signatory to various international treaties, including the Sendai Framework of Disaster Management, and The Sustainable Development Goals, which include commitments to “leave nobody behind”, to reduce social inequity and pursue social justice, it seems to us difficult to believe that the situation after the new legislation has passed would permit breach of these various international commitments.
2. This process is considerably weakened by the fact that The Council is the only party on ‘the other side of the table’, hence only planning tools are in play. Minimally it would be hoped that The Council is working with CDHB and/or Ministry of Health to predict, manage and mitigate the well-being and health impacts on residents at all stages of the process.
 3. Beyond health issues, the main impacts of climate change will be on property, if an effective ongoing programme of individual adaptation is supported by Council. We await news on funding but it is hoped that CCC is proactively and effectively engaging MfE and DPMC lobbying for a centrally funded support framework as part of the new legislation.
 4. By its nature adaptation is looking forward. The issue is that the further one looks forward, the greater the uncertainties not only in the science but also in societal and national situations. Looking forward three generations (100-150 years) is pretty much unheard of in planning or policy terms. At that future range most things are extremely uncertain, but after applying Precautionary Principle on top of safety margins, by Ocam’s Razor, that future is also much grimmer. In short the magnitudes of the proposed future hazard situation that has to be adapted to are likely allow just about anything to be put on the table as ‘realistic’. This supports planning regimes that pre-suppose managed retreat (certainly necessary for some communities) and can start communities on those roads too soon, or even unnecessarily. Either of these are not necessarily a problem if they are reversible, (based on Trigger Points), and do not have the effect of strangling communities.

Beyond these matters above, in outline the proposed process seems sound, and the as ever the ‘*devil is in the detail*’. Looking at how processes have been run overseas, we see weaknesses in the proposed process:

- Representation and ownership of the adapting community (the suburb) on The Coastal Panel. The literature abounds with international examples that underline and show that successful engagement that provides robust results that stick, have common characteristics: joint problem framing, and genuine community decision making.
 - In this case the framing has already been done by officers with the ‘list of options’

- Crucially community members from the suburb adapting (the main stakeholders) when they look around the room are likely to find possibly only 30% of the Panel are from that community. Of course, other suburbs are stakeholders, but at a much lower level than the residents: they have very little skin in the game
- Also on the composition of the Panel, it is potentially a missed opportunity that the communities themselves did not get to nominate panel members, for example a member of each relevant RA, local business representatives...etc.
- The process is silent about the next round of conversations, and how the results and content of the previous ‘conversation’ are carried forward or revised (up or down)
- There is also no mention about the key protection for communities: Trigger points. It is likely that coastal residents (outnumbered on the Coastal Panel) will have different appetites for risk than others from elsewhere in the City.

Timing of The Process

These conversations need to start sometime, however is now the right time? We are part-way through (effectively) the largest overhaul of our planning and local government system since the RMA replaced the Town & Country Planning Act in 1991. It is likely that the new planning regime will be in place and functioning within 3-5 years, and at that point we understand that District Plans as we currently conceive them are unlikely to exist. Irrespective of the virtues or not of either the RMA repeal or the CCC process, we are not convinced that there has been sufficient (or any) justification presented of why this CCC process needs to start now, when pretty much the whole of our local governance and planning systems are in the midst of radical and systemic change.

As the then Parliamentary Commissioner for the Environment, Jan Wright put it well when she said of adaptation:

“...We have time to do this well...”

In this context “well” could and should include decreasing inequity, increasing community well-being, leaving no-one behind, building a better more sustainable world for our children...etc.

If we come into this unfamiliar process in a rush, using just planning tools, employing tools that shut down, write-off, or slowly strangle communities without immediate need, or long before economically the point of retreat has been reached, we run serious economic and social risks that will undermine, impoverish and divide our people. In short, we will “*pluck defeat from the jaws of Victory*”. Nobody awakes in the morning with the thought of how many people or things they can ruin today. However, sleep-walking into this unfamiliar process, without mindfulness of the unintended consequences of our decisions is a recipe to do just that.

CCRU Submission

Issues and options paper for coastal hazards plan change and the Coastal Adaptation Framework

Mon Dec 6th 2021

Introduction

Following is the CCRU feedback on the Issues and options paper for coastal hazards plan change and the Coastal Adaptation Framework.

While they are separate documents they are intertwined projects and so we feel it is more efficient and cohesive to respond to both in one document. The question boxes on the feedback webforms are also too narrow so feedback in a document is necessary.

Our read is that the plan change is about regulating/restricting new development while adaptive planning is about adapting existing properties to mapped hazards. More clarity over what constitutes new development would be useful.

The foundation report relied on to inform the plan change, LIM notifications and coastal adaptation framework is the Tonkin & Taylor Coastal Hazard Assessment for Christchurch District 2021.

We do not think the process should proceed in its current state

1. Community has not had enough time or been allowed close enough involvement.

The community has not had an adequate opportunity to question the technical reports. A large amount of technical information has been released at once with little time for communities to digest and respond.

There has not been enough time or connection with council experts for the public to fully understand the council position, to communicate this to the community and for the community to give an informed response. While the small extension given is appreciated we have been unable to get effective collaboration with council experts during this time. More time is needed along with real consultation as many important questions remain unanswered.

There appears to be an expectation that the public take the results in these reports (T&T Tonkin & Taylor Coastal Hazard Assessment 2021 and GHDs Multi-Hazard Baseline Modelling etc) as a given and without question. This is not reasonable given the costs that will be shouldered by private property owners and the community. Given a history of problems with reports, it is a reasonable expectation that the experts be prepared to explain their science to the people affected by it. Pg 14 in the adaptation framework document has the following sentence, it is exactly what is required and has not happened.

- *Develop a shared understanding of coastal hazards and risk, and local knowledge and issues.*

There has been a regrettable lack of community involvement during the preparation of the technical reports. There was a perfect opportunity to include the community by allowing one place on the working group for a community representative but this was refused along with efforts to get minutes from the working group meetings.

2. The reports have outstanding issues, questions that need answers and are not suitable for the purpose of a plan change or LIM notification.

The intended purpose of the Tonkin and Taylor report is to assist adaptation planning. It is thus not fit for the purpose of a plan change or LIM notations.

- Section 1.2 reads:
 - *The primary intended purpose of the updated coastal hazard and groundwater information is to help inform coastal hazards adaptation planning for Christchurch District. The results of the assessment could also inform a range of other purposes, provided the uncertainties and limitations are understood and appropriately managed. These other uses might include review of the coastal hazards provisions in the Christchurch District Plan, infrastructure planning decisions, consenting applications and Civil Defence Emergency Management. In many cases, the results of this assessment may*

provide *an initial hazard screening for these other purposes*, with more detailed analysis then undertaken for specific locations and scenarios of interest.

- *It is important to note this assessment is not intended to map out a hazard overlay for inclusion in the District Plan, but provides information about hazards (and the uncertainty in our understanding of those hazards), which may be subject to further analysis and consultation to eventually determine if and where a hazard overlay should apply.*

Even for the purposes of assisting with adaptive planning the T&T report has a number of shortcomings that should be addressed and questions that need answered.

Broadly the T&T report and frameworks embed too much precaution, do not clearly communicate ranges high and low and at points authors step beyond being honest brokers. This is not the place to critique the report but some examples are;

- *Pg6 Coastal adaptation framework. "Under current conditions, it is predicted that New Zealand will experience around 30cm of sea level rise by 2050, 50cm of rise by 2075 and 1m of rise by 2115"*
 - This kind of statement misleads the general public, council staff and elected members. It reads as a statement of fact but relies on the most extreme IPCC scenario that is now viewed as unlikely by the IPCC itself.. Something like this should not be front and center and out of context like it is. The authors should know better, it is a red flag that undermines confidence in the rest of the report. We note that there was no questioning of this in the peer review.
- We are concerned that the models used in the T&T and GDH reports have not been back validated. The models are showing extensive flooding at current sea level. This does not seem to match with actual and observed flooding in recent 1/100 year events or correlate with previous modeling done by CCC.
- *Pg9 of the adaptation planning framework - How the risk-based approach could be applied to activities*

- It is not clear where the red zones are here and how they have been applied. Proposed restrictions in them are very severe, even infrastructure is non complying. Maps with where these zones are, are needed.
- Adaptive planning is about thresholds and trigger points; how this fits with areas being mapped as high risk using modeled RCP scenarios is unclear. Are we doing risk based planning or adaptive planning?
- *Pg10 of the adaptation planning framework - Developing policy direction that is responsive to the decisions made through adaptation planning and enables subsequent implementation without necessitating a plan change in all circumstances.*
 - Soothing words, but what does this actually mean and how will this be achieved given the modeled 'risk based' approach?

While we do not think this process can proceed with the technical reports and the framework in the state they are now, not all is bad and it can be rescued.

Community and council need to work together to answer unanswered questions, make necessary corrections and clarifications to produce a balanced technical basis and framework that everyone can support.

This will require council experts being prepared to sit down with community experts to go through the reports and framework to address issues and concerns. It is a shame that this did not happen from the beginning.

A better process and a way forward

1. Which option do you think is the most appropriate way forward and why?
2. Are there other options we should be considering?

Nobody (communities or council) want homes falling into the sea or communities destroyed 100's of years ahead of when they will actually be affected.

None of the options presented are ideal in our opinion. An ideal approach would be an adaptive approach. A genuine partnership between affected communities and council is required that starts with developing an agreed technical foundation.

We understand the council's concern about liability and needing to keep people out of harm's way but the cost of restricting investment in communities also needs to be recognised. A balance needs to be struck and for this to happen, we need reports that give **likely** outcomes with **ranges** to properly communicate uncertainty. Highly precautionary reports and frameworks are not helpful in this context.

A round table is needed with community experts engaging with council experts and report authors. Ideally the council would assist with funding to support a community expert group. The proposed STAG would be an ideal forum for this.

Models and an adaptive approach vs risk based approach

The biggest thing missing from this framework is a genuinely adaptive approach. 'Adaptive' is on the label and what the community and CCRU have been advocating for but is not what has emerged from the black box. What we have is a risk based approach but it is flawed because risk is being assessed on precautionary analysis.

A truly adaptive approach does not rely on models and in fact adds protection against a 'worse than we thought' scenario unfolding. Under an adaptive approach you extrapolate based on recurrent trends and reassess regularly. Communities agree to stop building or build in adaptable ways in areas that will be uninhabitable in [30, 50, 100] years based on current sea level rise trends. This is reassessed every 10 years as part of the district planning process and zones extended or contracted as appropriate. This approach shares a lot with the current framework but avoids the problem of having to rely on models that will be wrong. Issues with inappropriate developments around the margins can happen in both approaches. CCC needs to consider that avoiding issues at the margins will require such precaution that the cost outweighs the benefit.

Policy setting should also be decided in collaboration with the community.

Like the technical documents, policy settings should also be discussed and set in collaboration with the affected community at an expert level. For example,

- The place of Extreme RPC scenarios (RCP 8.5 and 8.5+)
- The appropriateness of the 100 year timeframe. Very few houses last this long and especially now where materials are less permanent and

technology improvements mean rebuilding is more attractive than renovation.

- The place of precaution etc

Guiding principles

1. Uphold te Tiriti o Waitangi

- a. It would be good to know what this means in practice, and how it differs from protecting the interests of other affected parties. Is appointing a Ngāi Tahu representative to each community panel that extent of it? Do Ngāi Tahu have interests in all areas? Who will appoint this representative?

2. Develop local plans for local communities and environments

- a. This is supported but there also needs to be consistency of approach and investment. There also needs to be a forum where all communities can talk to each other to avoid divided communities and inconsistent results.

3. Focus on public assets that contribute to the health, safety and wellbeing of communities

- a. Can we take this to mean that the council will focus on protecting (sea walls and the like) public assets but will avoid putting these in for private assets like peoples homes. If that is the case we think the people in those communities providing those public funds will have a problem with this principle. It also does not indicate a will by the CCC to consider all options in a truly transparent adaptive approach
 - i. 'Council's resources (including public funds) will primarily be used to manage risks to public assets that contribute to the health, safety and wellbeing of communities.'

4. Be flexible and responsive

- a. Agree with this but to be accurate responses need to be based on actual empirical trends and trigger points not computer models.

5. Recognise inter-generational equity issues

- a. The subtext here reads restrict development and move people back now so that it does not need to be done in the future. There is however a double edged sword, if you limit development and move people along too early you destroy the next generations inheritance. Destroying assets today has a compounding effect into the future. The equity and wellbeing

of people living today cannot be overlooked, having this in its current form risks doing this.

6. *Prioritise natural and nature-based options*

- a. We support this with the provision that they are not the only option and that other 'non-natural options' (whatever that might mean) are used when natural defences do not work

7. *Keep managed retreat on the table*

- a. Managed retreat as a guiding principle? This is completely out of place in this list and should be removed. Putting it here sends all the wrong signals. There is no information on when and how managed retreat would be implemented or compensation mechanisms. Until these and many other questions are resolved, managed retreat should not be on the table and certainly not a guiding principle.

Guiding principles that should be on the list

- b. People first - Affected people and community wellbeing should be at the centre of the process. The following is from pg16 in the *adaptation planning framework* -, highlights council centric thinking.

- i. *Land use restrictions (\$: Low)*

Land use restrictions are low cost for council, very high cost for private landowners who get no compensation.

- c. Good science that is clearly communicated, focuses on likely outcomes, is open to question and is authored by honest brokers.
- d. A genuine community partnership that recognises the costs borne by private property owners alongside councils need to reduce risk and comply with regulations.
- e. A recognition that adapting too early and too late are both costly.

Community panel and the stag

Community panel members should largely consist of affected property owners and be appointed by local residents associations. Currently it appears that only half the panel will be local and appointed by council. Affected communities should be able to appoint all members to community panels.

As well as a community panel there needs to be an umbrella group comprising a member from each panel. This is to make it easy for communities to talk to each other about the process. Avoid

the perception of divide and conquer, ensure consistency and equity between communities.

Affected communities should have equal rights with CCC when it comes to appointing members to the STAG. The STAG should be 50% community appointed. The STAG will highly influence community panels. This recognises the costs borne by communities and the partnership needed to resolve this.

Specific rules for flooding and groundwater

- *Should we have specific policies and rules on groundwater, or rely on policies and rules for managing coastal flooding?*

A single rule for both would only work if the areas covered in all scenarios are the same and the planning or adaptive response would be the same. This seems unlikely and more likely to lead to a development halt type response to cover all bases but further discussion would be required to fully understand this. The authors of the recent groundwater study state,

- *"The purpose of the groundwater assessment was not to accurately define the shallow groundwater hazard at a local scale, but to provide a high-level assessment at the citywide scale. **It is not sufficiently detailed to identify individual property risks therefore will have no impact on LIM wording.** Any future consideration of a groundwater response would be part of long-term planning, require additional investigation and policy direction from Council".*

Tsunami - *Should the District Plan manage areas at risk of a tsunami?*

Our opinion is that using the district plan to deal with natural disasters such as Tsunami is a bridge too far. The DP is too blunt an instrument that would lead to depopulation in very large areas if the same level of precaution was applied to tsunami that is being applied to sea level rise. If tsunamis were modeled on top of sea level rise then an even greater area will be affected. At some point we have to live with the possibility that disaster can strike and that emergency services and civil defence can adequately deal with it. The cost of completely avoiding all possible disasters is simply too high or more precisely is not an efficient use of resources.

Tsunami is however mentioned explicitly in 'the guidance'. The fact that you are asking if tsunami should be in or out raises the prospect that the guidance is in fact guidance and not a bible. The guidance (MtE, NZPS, Regional policy statement etc) are not perfect documents, they are confusing, often conflicting and tend to be highly precautionary and in places misleading. Guidance documents are written far from the coal face and so wiggle room is given to enable sensible planning regulations on the ground. Climate change guidance needs to be treated in the same way.

Summary

There is a lot that is good in the updated ccc commissioned consultant reports and the new framework but both suffer from a lack of transparency and engagement with affected communities during their development..

There was the opportunity to involve the community from an early stage by allowing a community representative to join the working group and making the working group process an open and transparent one. This was regrettably refused despite widespread support and numerous approaches.

Had these requests not been refused we might not be in the position we are in now. Communities have not had the opportunity to question staff thoroughly enough.

This leaves us in the position that we are now and that is gaps in the framework and technical reports that are not fit for purpose. However all is not lost and this important process can be rescued with some additional time combined with better community engagement.

What is needed next

Next community and council experts need to work together to plug the gaps in the framework and technical reports to get to an agreed base that both can work from to adapt. We think the STAG is the ideal forum for this provided STAG experts are 50/50 council community appointed.

Submission 44229

Avon-Heathcote Estuary Ihutai Trust

<http://www.estuary.org.nz/>



Christchurch City Council

Estuary Trust Submission: Coastal Adaptation Framework

The Avon Heathcote Estuary Ihutai Trust

1. The Avon Heathcote Estuary Ihutai Trust (AHEIT, The Estuary Trust) is a charitable society registered in 2003. It was formed as a result of community requests over many years for the formation of an organisation that included committed representation from statutory bodies, tangata whenua and other agencies.

2. The vision of the Trust is

Communities working together for
Clean Water
Open Space
Safe Recreation, and
Healthy Ecosystems that we can all enjoy and respect

*Toi tū te taonga ā iwi
Toi tū te taonga ā Tāne
Toi tū te taonga ā Tangaroa
Toi tū te iwi*

3. Further details about the Trust, its Constitution, the Memorandum of Understanding between the Christchurch City Council, Environment Canterbury and the Trust, and the Trust's Estuary Management Plan, please visit our website at www.estuary.org.nz

Kit Doudney

Chairperson, AHEIT

info@estuary.org.nz

Avon Heathcote Estuary Ihutai Trust Board's Submission

Coastal Adaptation Framework - 6th December 2021

The Estuary Trust agrees that planning for the future is vital.

We also agree:

- That the proposed planning involves communities, Rūnanga and Council working together for the best possible sustainable outcomes.
- The proposed planning involves research on options and adaptation pathways for addressing hazards.
- The staggered approach is best.
- The main risks are coastal flooding, erosion and rising groundwater.

Within the Framework

We have two requests to put forward:

1. Under the “draft guiding principles”, page 10, Section 2 “Develop local plans for local communities and environment”; “the proposed planning will address all risks and vulnerabilities of each Adaptation Area”. With regard to the Estuary’s risks and vulnerabilities, we request that an Estuary Environmental Management Plan be included in the overall Adaptation Framework.

Coastal inundation is primarily caused by severe weather events along the coast, with impacts on estuaries and adjoining rivers. Storm events create wave run-up, landward migration and severe loss of feeding grounds and habitat for wildlife. Because of this, planning must identify and assess the risks to all estuarine species and provide an environmental planning framework to sit within or along-side the present proposed Coastal Adaptation Framework.

2. That the Avon Heathcote Estuary Ihutai Trust be included in the local Coastal Panel – for community planning processes for our Adaptation Area.

Thank you for this opportunity.

Youth Submission on the Coastal Adaptation Framework

Students, as signed below, from Banks Avenue School, Chisnallwood Intermediate, Governors Bay School, Haeata Community Campus and Lyttelton Primary School wish to provide the following points as a submission on the Christchurch City Council's *Coastal Adaptation Framework*.

Some aspects that students agreed were good about the *Coastal Adaptation Framework* were;

- We believe equity and fairness are crucial to adapting and responding to coastal hazards. Because it recognises intergenerational equity issues, it shows respect for Te Tiriti o Waitangi and develops plans for local communities and gives them a voice. We like and support these three principles because they all consider equity and fairness.
- We believe upholding the treaty is important because Maori are tangata whenua and their voice must be heard. Because of spiritual connections to the land, it shows we are genuinely responsive and it ensures that people can have plenty of notice so people can adapt. Therefore we like guiding principle regarding upholding Te Tiriti o Waitangi.
- Living things are all important and need to be included. We like that the process considers the land as one lens and the living things as another. We like that the process aims to be sustainable for all living things.
- Opportunities and education are a priority. People should be educated, reassured and know what they are talking about. We like that the process involves everyone and that all ages have a voice. We can learn and adapt based on experience and research.
- We like that the process recognises the next generation. It is not just about now. It is about thinking of what's to come.

There were also some things that students agreed that we could continue to work on to improve, such as;

- Always consider other options before managed retreat, but when is it the last option there needs to be more education, information, and a clear plan, involving the community.
- Fixing the issue is top priority, but nature based options and cultural values need to always be considered first and respected, then man made.
- Consult the community about what is a community asset. Prioritise depending on the wider community needs.
- Provide more information and support to understand the principles when released. Education is key.

And there were other things that students agreed were missing from the *Coastal Adaptation Framework*;

- Education is everything.
- Education includes timeframes, the impacts of climate change and what's affected, the science, how to adapt, how you can learn, reassurance, how you can help, how you can stop the flow of misinformation, why you should learn.

- Education must be honest, be inclusive, include the community and have diversity. There must be the opportunity – the choice.
- Education must start with us as youth, so we can empower and inspire our communities.
- Everyone should have the opportunity to learn about climate change in order to make informed decisions on how to act.
- Climate change education should be compulsory for all, to ensure the future of Earth.

The students also agreed on specific points in regard to how children and young people fit into the process proposed in the *Coastal Adaptation Framework*;

- It's our future – we are just as important, and we just as capable. We are in the centre of it - what it currently is and what is coming. We are the next generation. Adults will pass away and it will be the world we live in. Our kids will say – why didn't we act?
- Young people are already changing things. We are the ones who can do it. We have knowledge, capabilities and strengths that adults may not have. We bring hope, and new and creative ideas.
- Treat us and our ideas with respect and value. Treat us as equals. Understand that we have some prior knowledge. What we have to say matters. We want to have a say on how we do things, and when we do it.
- And we expect genuinely include our thoughts and ideas.
- Ultimately, everyone's opinions matter – all ages, all ethnicities. Everyone needs an opportunity to have their say and to be heard.

Signed, Caitlin Rees, Charlotte Burrell, Flynn Lockwood, Georgia McKay, Hazel Bourne, Joel Patterson, Joseph Alfred, Kate Rayner, Keegan Verster, Luca Spruytte, Mia Johnson, Mila Bludell, Nydia Garing, Oliver Bradley, Pennritz Tagaloo, Renee Drury, Rosie Paul, Sarita Kotze, Seraphine Davidson, Starlet Odgers, Steph Harris, Sylvie Thurnell, and Zoe Derry

Appendix: Feedback and key themes from pre-workshop engagements with students

General feedback:

- On the whole, students are very supportive of all of the principles
- Students like the idea of being **flexible and responsive** to individual communities and their needs while respecting the unknowns with climate change including technologies
- Putting **nature based options** first was well received: it protects but also considers other living things; preserves beautiful places, wildlife, and their habitats; it also looks good and becomes a view in itself – like the red zone.
- **Te Tiriti o Waitangi** was widely supported and important thing to consider in conversations. Perhaps explain more about it, to learn more about it - be clear about what it is and why. The more you know about it the more you understand why it is important.

“All the principles are good (at respecting people’s rights). They back the fact that adaptation is challenging, that it is difficult process, that it could be dangerous, and it could be minor and then they are willing to explain the risks while providing reassurance” - Yr.8, Chisnallwood Intermediate.

“The principles put questions on the table, it is asking people to acknowledge what is going on now and, in the future. How bad is it? I would want to know because otherwise I might feel that we are having to do all of this for nothing” - Yr. 8, Governors Bay School.

What students supported most:

GUIDING PRINCIPLE: Develop local plans for local communities and environments

- Smart and valid
- Upholds equity and fairness; recognise and respects differences, it (will) fit their needs
- Because of this, people will be responsive to ideas. They know it is going to help *them* and there is a reason, that it will keep them and their community safe now and into the future

Ideas to support it include:

- Take time. Get to know people and their community, show them you care, this isn’t just a job
- Really listen. Be good at *really listening* and being open to the communities’ ideas, not going in with a plan that you want to happen

“You talk with them and not at them or just go and do it without talking to them” - Yr. 6, Banks Avenue School.

- Be honest. Being honest and upfront about the situation - don’t sugar coat it, don’t lie just because you want to make them happy or don’t want to upset them
- Support and reassure. Balance being honest with reassurance

- Give people time by providing lots of notice and having a clear timeframe
- Emphasise that *everyone* is going to need to adapt and change
- Involve key community people and leaders; give them jobs to help the engagement – this will help with working with others who have strong opinions
- Find and use opportunities to connect and learn in the community. Connecting in places and channels that the locals use already; but also learning from others – provide examples of where it has happened already – locally, nationally, and internationally
- All living things should be part of the plans, not just people

GUIDING PRINCIPLE: Recognise inter-generational equity issues

- Very impressed with this one; extremely important one to include and admire the council for including this
- It is important everyone's perspective and ideas are listened to, respected, and considered.
- Provides diversity and treats everyone equally.
- Will make any plan stronger
- Recognising and including the next generation (us) is important – it is our future, we see things differently because of that – adults see what is good for now, we see what is good for now and the future

“We have to live out what the video said before, like in 50 years’ time when we are alive when it could be over a metre” - Yr. 8, Chisnallwood Intermediate.

“If they are going to put a principle in there that says they are going to include kids, they have to follow through with it. They can’t just say it because they think the public will like it and it looks good” - Yr. 7, Lyttelton Primary School.

What students were unsure about or was topical:

GUIDING PRINCIPLE: Focus on public assets that contribute to the health, safety, and wellbeing of communities

- Long, confusing, and difficult to understand; not clear why this is valued so much, why it is a principle and a priority.

“I think it is about preserving things that are most important – people first then the assets? Do we get a chance to say what is an important asset to ‘our’ community?” – Yr. 8, Chisnallwood Intermediate.

GUIDING PRINCIPLE: Keep managed retreat on the table

- Shouldn't be just about moving people; have to consider nature

“Let it become public nature reserves and giving it a chance to become a multi-use place, maybe a place for endangered birds” – Yr. 7, Lyttelton Primary School.

- This is a sad idea but needs to be kept in the back pocket. It’s important to admit that this could be an option otherwise people will be quite outraged, just needs reassurance, look after people’s wellbeing.
- This an important thing for kids to know and learn about because we will be moving, and we can think about future problems and choosing not to live so close to the sea – we can make more informed choices and it also allows us to influence.
- Need to add the reassurance that comes with this option; it will worry people,
- Make it clear that this is the worst case scenario
- Need to manage it carefully otherwise people will be put off and not want to be part of the conversation

“It might feel they (the Council) are coming in already with this idea and decided that this is what is going to be done so they (the community) will not do any of the things they (the CCC) want them to do because they will think that this is what the Council wanted to do all along” - Yr. 6, Banks Avenue School.

- Suggest that if people have to move, where would they like to move (give them options which are close, safe, and ideal and then support them to adapt to that new place that it is similar to where they currently live, close but safe (from coastal hazards) - then make a deal with them.

What students thought may be a missing guiding principle:

Educate people on what is going to happen and provide a (clear) timeframe

“I think we need knowledge, resources, and accommodation, accommodating to people and where they live, the area and resources – we need the knowledge; I wouldn’t be interested in doing this if I didn’t have the prior knowledge and understanding that I do” - Yr. 8, Chisnallwood Intermediate.

- Education around what climate change is and what is going to happen. What is adaptation?
- Informing, honest, understanding and understand, sharing and education
- Need a variety of ways because everyone learns differently and has access (or not) to different resources

“Not everyone knows much about climate change and some people still don’t believe in it. Some people are still getting their heads around it and getting used to it” - Yr. 5, Banks Avenue School.

“If you only educate on what is going to happen, they might think it is going to happen tomorrow and everyone starts panicking” - Lyttelton Primary School.

- Education about the different stages and what to expect, explaining this is why we have a plan
- Include business as it affects their money and the possibility of having to move

Why students thought the voice of children and young people is important:

- It's our future, it affects us now and into the future

“Let's say, up in Waikato they are like looking at Christchurch City Council going 'oh look, they are involving the kids and getting a lot of public upping', you know. (But) They (the Council) might be doing it just to look good. What they really need to do is if they are going to bring us in and everything, they need to listen and they need to take us seriously” – Lyttelton Primary School.

“They may invite us, they may listen to us, but it will depend on if they really hear us” – Lyttelton Primary School.

- When going from the planning stage to actually carrying out these things, including children in that as well. Children will be really into it, things that adults don't find exciting, children will. And it adds to the solutions
- Being spoken to in a sensible way with respect – not babying us. Treating us fairly, don't assume we don't know

“Sometimes people think that we are just kids and therefore not smart. But younger people think differently, have different perspectives. Children bring more hope and creative ideas. If we plan now and work together, there is a lot of hope” - Yr. 6, Banks Avenue School.

02 December 2021

Christchurch City Council
Attn. Katy McRae
Civic Offices
53 Hereford Street
Christchurch

Sent via online submission

Dear Christchurch City Council,

RE: Coastal Adaptation Framework Consultation: LPC Feedback

- 1 Lyttelton Port Company Limited (*LPC*) wishes to take the opportunity to provide feedback on the Coastal Adaptation Framework released for consultation by Christchurch City Council (*CCC*).

ABOUT LYTTTELTON PORT COMPANY

- 2 LPC own and operate Lyttelton Port, which is the most significant port in the South Island in terms of total tonnages of cargo, number of containers handled, the value of exports and the value of imports. By volume, the Port accounts for 34.3% of South Island seaports' overseas exports and 37.4% of overseas imports. By value, the Port handles 41.4% of the South Island's seaports' exports and 67.9% of the South Island's seaports' imports¹.
- 3 The agriculture, forestry and fishing industries and the manufacturing industry together generate an estimated 105,000 jobs² or 34.4% of total employment in the Canterbury region and underpin much of the economic activity of Greater Christchurch³ and the wider Canterbury region. These two industry groups are highly dependent upon Lyttelton Port exporting their finished products and importing goods required as inputs to their production activities.

¹ For the year ending 30 June 2020. Source: Statistics New Zealand Infoshare, Overseas Cargo Statistics (www.archive.stats.govt.nz/infoshare)

² Source: Statistics New Zealand NZ Stat. Business demography tables, February 2019 data. Assumes a regional employment multiplier of 2.0.

³ As defined in the Canterbury Regional Policy Statement (inclusive of areas within the Christchurch City, Selwyn, and Waimakariri Districts)

- 4 Lyttelton Port is recognised as a 'lifeline utility' at a national level⁴, and as "strategic infrastructure", forming part of "strategic transport networks" at a Canterbury regional level⁵. LPC's Midland Port is identified as "important infrastructure" in the proposed Selwyn District Plan.
- 5 LPC operates two other key sites within the Greater Christchurch area – CityDepot in Woolston, and Midland Port in Rolleston. CityDepot provides an inland container storage and repair facility in close proximity to Lyttelton Port and is the South Island's largest empty container hub. Midland Port provides for the receipt, storage, packing, devanning and cross docking of full and empty containers and includes direct rail connection to the nine container shipping lines and eight container shipping services that access the Port.
- 6 Trade through Lyttelton Port has grown considerably across both containerised and general cargo. In the year ending 30 June 2020 the Port handled 446,101 containers, an increase of 2.0% on 2019 (despite the impacts of Covid-19 in the second half of the year ending 30 June 2020) and an increase of 188.5% since 2010⁶. This is equivalent to an average annual growth rate of 11.2%. LPC expects this growth to continue into the foreseeable future, as a result of:
 - a. Growth in Canterbury and South Island export and imports; and
 - b. Greater use of Lyttelton Port instead of other South Island ports as shipping companies continue the trend of using larger container ships and reducing services to some ports.
- 7 LPC forecasts ongoing growth for its container terminal to reach well over one million twenty-foot equivalent units (*TEUs*) by 2045. Non-containerised volumes of export and import trades are expected to continue growing but not as fast as containerised cargo.
- 8 Due to the locational requirements of a port operation, its business is inherently located within areas at risk of coastal hazards and therefore Lyttelton Port Company has interest in the ongoing understanding and hazard management within Christchurch to ensure its operation and development is successful.
- 9 In addition to the Port, the location of inland ports, such as CityDepot, are confined to certain areas essential to the efficient movement of freight. This requires inland ports to be located in close proximity to the rail network as well as having good access to the roading network; ultimately this requirement limits suitable sites within greater Christchurch.

GENERAL FEEDBACK ON THE COASTAL ADAPTATION FRAMEWORK

- 10 Based on the information presented by CCC through the GIS viewer, we identify that both the Port and CityDepot may be affected by coastal hazards as sea level rise increases. The Port, in particular, is Nationally Significant Infrastructure so must remain in its current location for the foreseeable future to continue to provide for the social and economic well being of the region.
- 11 The viewer currently identifies that much of LPC's coastal border is not armoured; however, this is not correct as LPC's assets are protected from erosion through sea walls, rip rap and hard protection across its coastal border. The viewer is requested to be updated to correctly reflect this coastal protection accordingly.

SPECIFIC CONSULTATION RESPONSES

Do you have any feedback on the Coastal Adaptation Framework?

⁴ See Schedule 1 of Civil Defence Emergency Management Act 2002.

⁵ See Canterbury Regional Policy Statement.

⁶ Source: LPC Annual 2020 Report page 17 and for 2010 data: www.championfreight.co.nz/largest-nz-ports

- 12 LPC is supportive of CCC's approach to form an adaptation framework as this provides Christchurch with a clear framework for which decisions may be made into the future.
- 13 Whilst the proposed approach to establish Adaptation Areas as a focus for community groups, CCC has not provided a map of each of these areas. We wish to view this map to understand how LPC's operation fits within these areas and processes. Moreover, we believe the map should be within the Framework Document with timelines for each Adaptation Area process to provide a clear expectation to stakeholders of when to expect engagement in their respective location.

Do you have any specific feedback on the proposed guiding principles. Have we missed anything?

- 14 LPC generally considers that the proposed principles address key areas associated with coastal hazard management and uncertainties that exist. There are however, certain principles we think need some further consideration, as discussed under the below subheadings.

Develop local plans for local communities and environments

- 15 Whilst the local plans are to involve communities, it is not clear how industry and infrastructure providers (outside of CCC) can provide input to Adaptation Planning.
- 16 Further, LPC is not only on the coastal border of Lyttelton, but considers itself to be part of the Lyttelton community. We wish to take a proactive approach to community matters that are intertwined with the Port and recognise the importance of this forum on adaptation plans. We respect the need for the community to be heard independent of LPC and consider it appropriate there would be a separate forum for industry and infrastructure owner input.

Focus on public assets that contribute to the health, safety and wellbeing of communities

- 17 Whilst we appreciate that CCC may wish to focus on its public assets for funding purposes, private and other public assets and infrastructure are equally as critical to the wellbeing of communities. CCC needs to give sufficient consideration of other assets and infrastructure in policy making which may affect the ability of such infrastructure to operate or develop.
- 18 Therefore in the context of Christchurch, this Principle could be re-written as Focus on ~~public~~ assets that contribute to the health, safety and wellbeing of communities.

Recognise inter-generational equity issues

- 19 LPC agrees inter-generation considerations within the coastal adaptation framework is appropriate. However, the paragraph describing this conflicts with the next principle of 'Prioritise natural and nature-based options' in that it states that CCC will 'prioritise options and pathways that minimise burden...'. As both principles state that they will be prioritised, it is not clear how these two aspects would be managed where options may be at odds to each other. We suggest CCC should seek to clarify this between the two principles.

Keep managed retreat on the table

- 20 LPC appreciates that all options need to be available, wish to point out that some activities such as Ports cannot retreat inland and continue to function. This principle therefore needs to be balanced in context of the types of activity that are occurring.

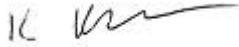
Is there anything you'd like to tell us about our proposed engagement and decision-making process?

- 21 We request that CCC determine a process or forum in which industry and infrastructure providers can input to adaptation options, as discussed earlier in this letter

Any further comments

22 Finally, LPC welcomes Christchurch City Council to contact us for any further discussion on matters raised in this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K Kelleher', with a long horizontal flourish extending to the right.

KIM KELLEHER
Head of Environment and Sustainability



Federated Farmers of New Zealand

Submission on Christchurch City Council Coastal Hazards District Plan Change

Issues and Options Discussion Paper

12 November 2021



Submission on Christchurch City Council Coastal Hazards District Plan Change

Issues and Options Discussion Paper

Name of submitter: Federated Farmers of New Zealand

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This is feedback on Christchurch City Council's Coastal Hazards District Plan Change – Issues and Options Discussion Paper.

1. Introduction

- 1.1 Federated Farmers of New Zealand (FFNZ) is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers, as well as many rural businesses and communities.
- 1.2 FFNZ appreciates the opportunity to provide feedback on the Coastal Hazards District Plan Change, in terms of managing new development in areas exposed to coastal hazards.

2. FFNZ comments on the Issues and Options Discussion Paper and the Coastal Adaption Framework

- 2.1 The rural communities of wider Christchurch city, in particular Banks Peninsula are particularly at risk from potential coastal hazards. This is reflective of the landscape (steep hills, limited access, towns focused around historic wharf areas). The issues of concern are the long-term vision of more people living in our rural environment with our town centres needing robust systems and plans in place to deal with potential coastal hazards. For example, addressing needs that the Fire Brigade which is dependent on volunteer support is in areas that are out of flood risk, and that the roading network (including bridges, culverts, roading) can support alternative access in times of severe flooding, coastal erosion, associated landslides, etc.
- 2.2 In general, FFNZ are supportive of option 1 proposed by Council as the “preferred” version in the Issues and Options Discussion paper. We do note that there was a lot of supporting information provided for this scenario – and minimal for the others.
- 2.3 FFNZ appreciates that option 1 is based on a risk-based approach – which allows for a targeted approach that can be specific for key areas.
- 2.4 However, along with this we would suggest that the next steps for option 1 include a co-design approach with all the affected communities to ensure that the optimum adaptive management plan approach is achieved. The long-term wellbeing and resilience of our rural and urban communities to hazards is dependent on their involvement in planning for coastal hazard management. Co-designed solutions with the communities will help to address specific concerns and issues at a local level. A co-design approach would directly align with the adaptive management model proposed in the Coastal Adaption Framework.
- 2.5 FFNZ are supportive of the Coastal Adaption Framework proposed – and agree with the proposed flexible approach. We are supportive of the adaptive management model to help facilitate the coordination required to address the issues raised in the discussion paper. A singular or narrow “consultation” approach is not going to adequately address and capture the specific requirements of the rural communities impacted. A co-design approach with all community parties will help create an integrated multi-faceted approach that addresses specific concerns.
- 2.6 Specifically, regarding the discussion document we would like further clarification of the information provided in table 2 “High Level Activity Status by Risk” (page 9), in terms of what is meant by “fencing” as an activity. Is this mean to cover only urban fencing or including the vast tracks of farmland fencing that this would cover? The way the table is currently set up, large amounts of farm fencing would be captured by the restricted/non-

complying control level – which is unacceptable to landowners, and an impediment to existing farming activities.

- 2.7 Council also requested feedback on the 2 specific questions on page 5 of the discussion document.
- 2.8 Regarding the first question, “should we have specific policies and rules on groundwater or rely on polices and rules for managing coastal flooding?”. This is a broad question that would require some more detail, however, we would at first reading, consider that there should be specific policies and rules for both as the management and impact of each is quite different. It is more reflective of an integrated management approach discussed above.
- 2.9 The second question, “should we mange risks to life and property from tsunami through rules in the District Plan...”. Serious Tsunami events are uncommon and should be covered through civil defence activities.
- 2.10 Local authorities are responsible for improving the social, economic, environmental, and cultural wellbeing of our communities. In terms of the Coastal Adaption Framework (Coastal Panel Analysis (page 9)), given that the matters to be considered here by Council include environmental, cultural, and social impacts, it would seem logical to include economic impacts as well.
- 2.11 In the Coastal Adaption Framework “Roles and Responsibilities” we understand and appreciate the need for clarity in terms of who is responsible for what in terms of protection of privately owned assets (from coastal hazards). What would be helpful here from a community perspective (individual landowner) is fact sheets or easily accessible information for the public, so this is clear. Helping individual landowners develop and implement strategies and actions to manage risks could be part of the co-design approach with communities.
- 2.12 The Coastal Adaption Framework “guiding principles” includes “focus on the assets that contribute to the health, safety, and wellbeing of communities”. The explanation for this guideline includes that privately owned assets that directly contribute to the health, safety and wellbeing of communities may also be a focus for adaption planning. FFNZ would see this as being a key part of the co-design approach with communities – to help identify these assets early on.
- 2.13 FFNZ is happy to work with Council in helping with developing a community-based co-design strategy for coastal hazards to ensure we have sound community support facilities.
- 2.14 FFNZ can also provide support with the Coastal Panel for specific areas in terms of helping to identify local landowners who can be part of the Panel (Coastal Adaption Framework).

Submission on Christchurch City Council's Coastal Adaptation Framework

Q1. Do you have any feedback on the Coastal Adaptation Framework?

(i) I believe that the community has not had time to scrutinise and question the technical reports especially those of Tonkin & Taylor September 2021 and Jacobs September 2021. A substantial amount of technical information has come out at once with little time for communities to digest and respond. More time is required along with real consultation as many important questions remain unanswered.

I believe that there is an expectation that the public take the results in the technical reports (T&T Coastal Hazard Assessment 2021, Jacobs report and GHDs Multi-Hazard Baseline Modelling) as a given without question. This is unreasonable given the long term impacts that could result (financial, social and wellbeing) and costs that will be shouldered by private property owners and the community. It is a reasonable expectation that potentially impacted residents and communities are given the opportunity to scrutinise the reports and the experts explain their science to those affected by it. The Adaptation Framework document on Pg 14 states in relation to the engagement process;

“Develop a shared understanding of coastal hazards and local knowledge and issues”.

While this is required, it has not happened sufficiently. There has been a distinct lack of community involvement during the preparation of the technical reports. There was the opportunity to include one place on the working group for a community representative but I understand this was refused as were efforts to get minutes from the working group meetings.

(ii) In coastal hazards or any other hazards, there will always be risk – hence the need for insurance – but a sensible assessment of the likelihood of risk is required and without the addition of risk upon risk resulting in the most conservative of risk profiles requiring restrictive management and impacts of property owners potentially 50 to 100 years prior to the reality of a risk event.

My view is that restrictions and prohibitions across large areas should not be implemented now for events that may (or may not) occur in 100 years' time. This is beyond the life of most buildings.

(iii) To ensure the Coastal Panel can best represent the community and avail itself of independent advice – be it technical, legal or otherwise, it is recommended that funding is made available for the Coastal Panel and / or recognised community groups to avail themselves of such independent advice as it relates to the Adaptation process ie relevant experts not appointed by or utilised by Council.

(iv) The Coastal Adaptation Framework document notes that it “puts community engagement at the centre of decision-making”. We appreciate that Council representatives have undertaken various community presentations (where some feedback was encouraged but which were not consultation forums) to highlight the existence and approach of the process. However beyond noting that there will be a Coastal Panel with community representatives, there is very little information regarding how specifically the community will be engaged and at the centre of decision making. In relation to the Coastal Panel, it is not stated *who* will select the panel, *how* will it be selected, *how many* people will be on it, will they be *spread* across all areas *within* an Adaptation Area eg if Southshore and Redcliffs are within the same area, will there be representatives from each area as the issues concerning each area are quite different? Will this Panel hold all the decision making cards and Council facilitate the process only – or something else? The Framework is not clear about the intended process and active consultation of this with those in the community likely to be most affected, will be critical for community to be at the centre of the process.

How will Council ensure that Coastal Panel members are not a majority of “Council aligned” participants? (While the Council say they are open minded and do not have any specific agenda, the Coastal Adaptation Framework as it exists already has conservative bias to it.)

It will be important to have people of diverse experiences, situations (eg resident, business owner), and views on Adaptation with a strong preference for those who are most likely to be directly impacted by potential Coastal Hazards within the relevant Adaptation area. I believe there should be a minimum of 6 such people on the Coastal Panel in addition to runanga representation, “youth” voices or any from the “wider” community as the Framework notes will be included on the Coastal Panel. Will CP members need to apply, or be appointed by Council? I suggest that people interested in being on the Panel apply to their local Residents’ Association (or other relevant community entity) for selection with appropriate criteria utilised for selection.

On Page 14, there is a heading “Initial community engagement about the Adaptation Area”. It is not clear if this engagement is via the Coastal Panel – OR will it be a separate community engagement process? How will this be run and by whom – by Council, by the Coastal Panel or some other person or entity? These questions need to be answered and whichever the final process, must reflect a genuine, committed process where it is not just a presentation and there are not pre-conceived/determined outcomes.

One of the objectives within this community engagement as noted on Page 14 is to “Build an understanding of the roles and responsibilities, and the guiding principles”. Again, it is not clear whose roles and responsibilities this refers to? – Council, Coastal Panel, some other community engagement group???

I believe greater clarity around all the above is required and to be communicated for further community feedback.

All community engagement must be genuinely open to input from the community, community members must be heard, their views respected, and the approach taken by Council be non-defensive in terms of responding to questions and feedback. This is a legal requirement under the MfE Guidelines.

Regarding the STAG – There is no information regarding how members of the STAG will be selected and I believe they should be experts appointed by affected residents and/or their Residents’ Associations.

Q2. Do you have any specific feedback on the proposed guiding principles?

(i) Yes, Managed Retreat is the only Adaption option submitted as a guiding principle in the Coastal Framework.

At a Council meeting an officer told the audience this is a specific requirement from Government. I have read the MfE Preparing for Coastal Change: A Summary of Coastal Hazards and Climate Change Guidance for Local Government December 2017 document, and there is nothing that says that Council has to specifically note in their process that Managed Retreat must be stated as a Guiding Principle in their reporting/process. In fact the whole document is about coastal adaptation with little mention of retreat. Also I cannot find this requirement in the NZ Coastal Policy Statement 2010 Dept of Conservation.

The problem with this is that Managed Retreat in the Framework has been prioritised as the preferred option, whether it was meant to be or not. Given the open consultation process we are in, ALL options should remain on the table, equal with each other. I believe the process is biased as a result.

Of further concern is that the STAG as stated on Pg 14, is likely to have to consider how adaptation options align with the Guiding Principles. A Maintain, Accommodate or Protect option in no way aligns with the Guiding Principle of Managed Retreat remaining on the table. So theoretically, on this basis, none of the other options would meet the Guiding Principles if Managed Retreat remains one. It should therefore be removed as a Guiding Principle to provide equity with other Adaptation Options.

(ii) On Page 15, examples of pathways shown do not seem to reflect the premise that the community is at the heart of the engagement. The cost ranges noted appear to reflect a cost range to Council (rather than land owners) and acknowledging that these are examples, writing that "Land Use Restrictions" are "\$ Low", fails to understand that restricting use is likely to be a significantly high financial and emotional cost to private land owners. This type of thinking needs to change. For private land especially, it needs to authentically take into consideration and reflect the potential impact on residents and businesses in Adaptation Areas.

(ii) I believe additional Guiding Principles are needed as follows;

* Putting people first. The well-being of affected people and community should be at the centre of the process – not just engagement with them.

* Good science that is clearly communicated, focuses on likely outcomes, is open to question and takes into account all likely scenarios.

* A genuine community partnership that recognises the costs borne by private property owners alongside council needing to comply with regulations.

* A recognition that adapting too early and too late are both costly. Adapting too early based on predictions that are overly conservative and may never happen is bad practice.

Q.3 Is there anything you'd like to tell us about the proposed engagement and decision making process?

(i) To ensure the community is at the heart of the process, for community engagement beyond the Coastal Panel it is recommended that an independent facilitator be used with Council as an observer, fully able to focus on the impacted community's experiences, past learnings and opinions, and able to respond to queries if required. I have had experience with consultants swaying their reports in favour of the goals and desired outcomes of their clients. We note the both T&T and Jacobs are being briefed and paid by Council. While I am not saying that the Council have preferred outcomes (although some of their documentation suggests this), a truly independent facilitator would ensure the open process that is desired and legally required.

The short feedback timeframe (extended slightly) does not do justice to what is a complex, significant, long term impact and potentially life changing project. Given the issues presented here and no doubt many others, I suggest the whole Coastal Adaptation Framework is more comprehensively developed than it has been to date.

The Framework document notes that the Government's Climate Adaptation Act will be introduced in 2023 and will address the issues associated with managed retreat and clarify Government's approach to any funding for the retreat or protection of private assets. Whilst Council has noted it can change its Framework to respond to these legislative changes, the work being undertaken from now in Council's Adaptation process may well be counter-productive to that. Additionally, it may be more difficult to adopt a different approach with several years of community engagement and Council input and planning to potentially undo. I believe it would be much more prudent to wait until the contents of the Act are known before progressing on the Adaptation process.

RCP8.5 issues

I have major concerns over the council, Tonkin and Taylor and Jacobs accepting RCP8.5 as an appropriate basis to work from, and this is discussed below.

(i) On p7 of the Plan Change document it is stated that "Jacobs and council staff selected 60cm sea level rise by 2080 and 1.2m sea level rise by 2130 as the most appropriate to apply to both

erosion and coastal flooding hazard scenarios. These scenarios reflect the closest sea level rise to the more conservative global projections as recommended by the Ministry for the Environment.”

When you look at Figure 7.1 in the Tonkin and Taylor 2021 report you see that these figures are actually both higher than the RCP8.5 projection. So these two figures do not “reflect the closest sea level rise to the more conservative global projections”. They are actually more conservative than these conservative projections! And this is what the Plan Change is based on: more conservative than the conservative. I would argue that the Plan Change should not be based on RCP8.5, but actually on RCP4.5 and RCP8.5 as the National Guidance requires Council to do.

(ii). The advice to councils from the Ministry of the Environment on undertaking a local climate change risk assessment “A Guide to Local Climate Change Risk Assessments” 13 October 2021 reads:

2.2.1 “The two recommended RCPs for a risk assessment are RCP4.5 and RCP8.5: the lower mid-range and high-end scenarios. The RCP8.5 scenario is useful to identify the most significant risks if warming continues unabated.”

Warming is not continuing unabated. It is clear that the world powers and private companies are undertaking measures to reduce warming as discussed later.

Why has the council not followed the advice from Ministry for the Environment? Why do they feel they can ignore this advice? This blatant refusal to follow advice from the Government is consistent with a council officer telling me previously that they did not follow the MBIE advice on flood hazards post-earthquakes. The Christchurch City Council is getting a reputation.

(iii) Tonkin and Taylor Coastal Hazard Assessment for Christchurch District Summary Report September 2021:

In Section 7 the report references RCP8.5M and states that this is “most aligned with our current trajectory of emissions”. We do not believe this to be the case having read multiple scientific papers including the IPCC AR6 document that Tonkin and Taylor referred to in Section 7.

Two key differences between the IPCC5 and IPCC6 reports are that the latter includes shared socioeconomic pathways that all have somewhat of a ‘business as usual’ approach to differing degrees and their dismissal of RCP8.5 as being a likely scenario.

Also, a Council technical expert/consultant said in the community meeting that no confidence can be put in any of the RCP scenarios. If that is the case, why are Tonkin and Taylor making RCP8.5 their ‘main point of reference’?

The reason this is important is that in Table 7.1 Tonkin and Taylor say this (the RCP8.5M) scenario will be the main point of reference for adaption planning as it is most aligned with our current trajectory of emissions. What does “the main point of reference” mean? Is it just a marker from which we can go up and down, or is it their baseline that they will prove or disprove everything else? If it is the latter, that is an inaccurate situation based on out of date and faulty information.

In Table 7.1 of the Tonkin and Taylor report, Tonkin and Taylor have added a high (upper estimate) classification of RCP8.5H+. Including this RCP8.5H+ scenario is very misleading as it

makes it look as if the RCP8.5 scenario is not the most conservative, and could actually be deemed as middle of the road and likely. This is not the case. RCP8.5 is extremely conservative and proving to be unlikely at all. Tonkin and Taylor also use words like “if we don’t act effectively” with no definition of what this might be – very wishy-washy.

4. In recent years there have been considerable studies from reputable sources that have refuted the likelihood of RCP8.5 scenarios.

Justin Ritchie, Hadi Dowlatabadei – University of British Columbia 2017:

“This paper finds climate change scenarios anticipate a transition towards coal because of systematic errors in fossil production outlooks based on total geological assessments like the LBE model (Learning By Extracting). Such blind spots have distorted uncertainty ranges for long-run primary energy since the 1970s and continue to influence the levels of future climate change selected for the SSP-RCP scenario framework. Accounting for this bias indicates RCP8.5 and other ‘business as usual’ scenarios consistent with high CO₂ forcing from vast future coal combustion are exceptionally unlikely. Therefore the SSP5-RCP8.5 should not be a priority for future scientific research or a benchmark for policy studies.”

Justin Ritchie – The Breakthrough Institute 2019 and Adjunct Professor at the University of British Columbia – a 3°C World is Now ‘business as usual’:

“While there is some utility in having ‘what might have been’ scenarios that are radically divergent from the path we are on today, these should not be used to set policy or plan for future climate impacts...the world has taken concrete steps to move away from coal in the past decade, and this progress should be reflected in our assessment of likely emissions pathways and their resulting climate impacts going forward.”

We note that RCP8.5 relies on ‘business as usual’ in terms of carbon emissions and ignores the reality that the world has taken some steps already and is in the process of taking more steps in the reduction in carbon emissions, not just in the burning of coal as discussed above, but in many other areas. Hausfather discusses this further below.

Zeke Hausfather – explains: How Shared Socioeconomic Pathways Explore Future Climate Change Policy, 19 April 2018, from Carbon Brief, Clear on Climate – UK based website.

Hausfather holds a PhD in climate science from University of California, Berkeley:

“One of the big changes brought about by the release of the SSPs is a broadening of the baseline no-new-policy scenarios available to researchers. Over much of the past decade researchers have tended to use the high-emissions high-warning RCP8.5 as their ‘business as usual’ baseline – a worst case scenario of unchecked warning to compare against features where emissions are mitigated.

While RCP8.5 lives on in the form of the SSP5 baseline, it is now just one of many possible no-new-policy features. The fact that only one of the SSPs, SSP5, can reach the level of emissions found in RCP8.5 suggests that it may not now be best suited for use as the sole baseline scenario in future research.”

5. IPCC AR6 WG1 Chapter 1 p1-110 lines 14-16 (followed and referenced by the Ministry for the Environment and referenced by Tonkin and Taylor):

“...However, the likelihood of high emission scenarios such as RCP8.5 or SSP5-8.5 is considered low in light of recent developments in the energy sector (Hausfather and Peters, 2020a, 2020b).”

This is a direct quote from IPCC AR6. It does reference another article which no doubt it supports since it is referenced here. If it did not think that the likelihood is low, surely they would not say this. It cannot be argued (as it has been by a council technical expert at the community meeting) that this is not relevant because it was “a quote from someone else”. This is a critical statement quoted in a key document impacting on the whole sea rise discussion and cannot be ignored as Tonkin and Taylor, Jacobs and council seem to be doing. As shown, RCP8.5 is being used as the basis for sea level rise and the various interpretations and potential decision making is being made on this overly conservative baseline.

Richard Dalman
Registered Architect FNZIA

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████████████████

6.12.21

SUBMISSION 44242

Submission to CCC – Coastal Adaptation Framework and District Plan

My name is David East, I have qualified for a BSc (Canterbury University) majoring in Geography and Geology with a component of my degree in Coastal Studies and Fluvial processes. I have lived in the Coastal – Burwood Ward all my life and as the addendum to the signatory below indicates, I have had significant involvement in a number of community groups and believe I can comment on the subject matter with significant relevance

At the risk of being labelled a Climate change denier, I wish to state that I acknowledge Sea Level Rise and significant changes in weather and climate; however I may differ in the reasoning for such phenomenon

The Christchurch City Council is obliged to review the Natural Hazards Chapter of the District Plan although it is well known now that this Plan will be super ceded by a Regional Plan. My submission is not against the need for an update but rather the process by which this is developed (and has been carried out to date).

The very mention of the words “Christchurch City Council” in the Eastern Suburbs is usually received with a huge amount of distrust and derision following years of apathy toward the area and procrastination in many activities. To quote the SSRA submission:

“Southshore has been mercilessly spotlighted, over analysed, over consulted and at times over regulated”

This descriptive applies to the other coastal suburbs as well. Residents are tired of consultation and are resistant to the submissions process, as time and time again, little changes from the draft proposal. It is a common notion that the Chapter has already been written and consultation is a process of working backward to achieve the desired result. The whole process appears to be a tick box exercise to satisfy the requirements to consult prescribed in the Local Government Act 2002 and amendments

Coastal Adaptation Framework

- I request that there is a pause in the Coastal Adaptation Framework Process for the following reasons.
- All information for adaptation and planning is based on the T & T report- individuals and the community have had no opportunity to ask questions, discuss and feedback on any issues regarding this report.
- There is an attitude that we are the experts and “how dare you question our methodology”.
- I am reminded of a quote often used by a former colleague – Peter Beck “The wisdom of the people far exceed the knowledge of the experts”
- The place of extreme RPC scenarios 8.5 & 8.5+ in the CHA process. Given their now Internationally recognised low probability and relevance, their use is now questionable
- CCRU requests to participate in Coastal Adaptation Framework panels have been denied.

- CCRU requests for minutes of the proceeding of these meetings have also been denied
- Recent emails to CCRU expressing concern about ongoing requests for information and indicating “...no longer be able to offer you dedicated time with internal and external subject matter experts on the CHA methodology.....” – a sad indictment of lack of adherence to Guiding Principle 4
- The Tonkin & Taylor report has had a rolling Peer Review, but I am concerned that there is a “perceived conflict interest in this process.

- **Guiding Principles.**

“From Principles flow Policy, and from Policy comes actions and regulations – Everything flows from the guiding Principles”

From the outset, the guiding Principles were selected with input from Papatipu Runanga and Ecan but notably without any community input. I request this process be reviewed – **this reinforces the request for a pause.**

- **Uphold the Treaty of Waitangi** – support (with some reservation)
- **Develop local plans for local communities and environments**
I support localised plans in principle but it is unclear where boundary lines will be drawn and if each locality will be treated fairly and equitably – there is not enough detail. It is also unclear whether each locality will be guided by science that is locality-specific and has been tested against the reality of that locality.
- **Focus on public assets that contribute to health, safety and well-being of communities**
It is artificial to consider public assets in isolation; there is a duty of care to the community as a whole, including private assets, to support social and economic wellbeing. There is also a lack of equity between those areas that have already had protections and those that have not
- **Be flexible and responsive**
I support the general tenor, but am concerned that this will not happen in practice. CCC needs to show good faith about the engagement process and build back trust. CCC needs to show openness and transparency and ask more open – ended questions of our community regarding what the guiding principles should be, from the outset, rather than internally developing 7 principles without community input
- **Recognise intergenerational equity issues**
It is not entirely desirable to unduly burden future generations, equally we also do not want to act so conservatively that this generation is prematurely and disproportionately affected, only to find out in the future that the modelling based on worst case scenarios may be inaccurate.
- **Prioritise natural and nature based options**
NZCPS directs Councils to discourage hard protection structures and promote the use of alternatives. It also notes that hard structures can be used if **considered necessary**. CCC appears to have ruled out Hard Structures completely without any consideration. The principle also needs to include recognition that hard protection structures may be the only practical means to protect existing infrastructure.
- **Keep Managed retreat on the table**
This is not a principle and should be removed

CCC has listed 5 ways to adapt to coastal hazards of which retreat is only one. It is inappropriate to list only one of the adaptive options. CCC claims that Guiding Principles 6 and 7 have been mandated by NZCPS – this needs further clarification NZCPS states that managed retreat should be considered a risk reduction response **along with other options** and this is the position CCC should take.

Including this as a principle elevates tension and creates undue stress and uncertainty for the community.

Coastal Panel

I support the need for experts appointed by the community being part of this group on a 50/50 basis

District Plan Change

- I request a pause in this process as the community has not had the opportunity and time to review, analyse, challenge, absorb and understand the data and studies which inform the four options.
- The Four options are predicated on the Guiding Principles being agreed upon. “From Principles flows policy and from policy come actions and regulations. Everything flows from the Guiding principles”
- As such the options, possible innovative development and consideration of vulnerable / susceptible development cannot be considered until the Guiding principles are agreed, technical papers are adequately assessed, modelling and mapping are agreed by all. For those reasons I am unable to select any of the options and consider that there may be more or hybrid options.
- Tonkin and Taylor clearly state they did not intend the hazard maps would be used for District Plan planning and overlay purposes. Clearly they should not be used to inform any part of the plan change until this matter is resolved.
- I request, that for openness and transparency, it would be helpful if the terms of reference (or Brief) given to consultants was made available to interested groups.
- “To account for climate change and impact of sea level rise, Jacobs and Council staff selected 60cm of sea level rise by 2080 and 1.2m sea level rise by 2130 as the most appropriate to apply to both erosion and coastal flooding hazard scenarios.” These bench marks are over precautionary levels and may restrict development prematurely.
- I request that the selection of this level of projected risk (Based on RCP 8.5 and 8.5+) be reviewed, given the level of uncertainty that now prevails on these predictions
- I am adamant that modelling needs to include scenarios from Hard Engineering solutions as well as from Natural defences.
-
- Modelling needs to be tested against the realities of what is actually happening in our coastal environment. CCC need to monitor actual sea level rise, sand accretion and flood events in

local communities for a 10 -15 year and then review this hard data against current modelling predictions and assumptions– **this in my opinion is Adaptive Management.**

- It is vital that this data is vigorously tested before being used to establish policies and rules for future development.
- I request that peer review(s) are undertaken prior to the notification of any future plan change. Reviews and subsequent peer reviews need to be an open, absolutely completely independent and transparent process so trust between the Council and our community can be restored. Until this happens, informed decision on the four options proposed in the Issues and Options Discussion Paper cannot be made
- It is important that the district plan is not so prohibitive or restrictive that no development in our coastal communities occurs, only to find out that in 2080 the sea level has not risen to anywhere near 60cm.

Such an approach potentially places a financial burden on coastal residents now and affects the social and economic wellbeing of coastal communities.

- Our community needs adequate time to fully consider and digest all the information. The outcomes will effectively have major implications to their lives, livelihood, family, community, suburb and the city as a whole. It is important to get this right. Covid restrictions and the pending Christmas break are further impediments to a good result.

I wish to note:

I support the submission of CCRU

I support the submission of the North Beach Residents Association

I support the submission of the Southshore Residents Association

I wish to speak to my submission

Kind regards

David East

City Councillor Coastal Ward (& Burwood Pegasus) – 6 years

Community Board Member 15 years

Life Member – North Beach Surf Life Saving Club

Life Member – Surf Life Saving Canterbury

Life Member – Surf Life Saving NZ

Member & Treasurer CCRU

Member & Treasurer – New Brighton Pier, Foreshore & Promotion Society Inc

Member, Past President & Treasurer - North Beach Residents Association

Chairman – Wainoni – Avonside Community Services Trust

Feedback on Christchurch City Council's Coastal Adaptation Framework

Q1. Do you have any feedback on the Coastal Adaptation Framework?

The Framework document notes that *it puts community engagement at the centre of decision-making*. We appreciate that Council representatives have undertaken various community presentations (which were not consultation forums) to highlight the existence and approach of the process. However beyond noting that there will be a Coastal Panel with community representatives, there is very little information regarding how specifically the community will be engaged and at the centre of decision making. In relation to the Coastal Panel, it is not stated *who* will select the panel, *how* will it be selected, *how many* people will be on it, will they be *spread* across all areas *within* an Adaptation Area eg if Southshore and Redcliffs are within the same area, will there be representatives from each area as the issues concerning each area are quite different? Will this Panel hold all the decision making cards and Council facilitate the process only – or something else? The Framework is not clear about the intended process and active consultation of this with those in the community likely to be most affected, will be critical for community to be at the centre of the process.

How will Council ensure that Coastal Panel members are not a majority of “Council aligned” participants? It will be important to have people of diverse experiences, situations (eg resident, business owner), and views on Adaptation with a strong preference for those who are most likely to be directly impacted by potential Coastal Hazards within the relevant Adaptation area. I believe there should be a minimum of 6 such people on the Coastal Panel in addition to runanga representation, “youth” voices or any from the “wider” community as the Framework notes will be included on the Coastal Panel. Will CP members need to apply, or be appointed by Council? I suggest that people interested in being on the Panel apply to their local Residents’ Association (or other relevant community entity) for selection with appropriate criteria utilised for selection.

On Page 14, there is a heading “Initial community engagement about the Adaptation Area”. It is not clear if this engagement is via the Coastal Panel – OR is will it be a separate community engagement process? How will this be run and by whom – by Council, by the Coastal Panel or some other person or entity? These questions need to be answered and whichever the final process, must reflect a genuine, committed process where it is not just a presentation and there are not pre-conceived/determined outcomes.

One of the objectives within this *community engagement* as noted on Page 14 is to “Build an understanding of the roles and responsibilities, and the guiding principles”. Again, it is not clear whose roles and responsibilities this refers to? – Council, Coastal Panel, some other community engagement group???

I believe greater clarity around all the above is required and to be communicated for further community feedback.

All community engagement must be genuinely open to input from the community, community members must be heard, their views respected, and the approach taken by Council be non-defensive in terms of responding to questions and feedback.

Re the STAG – There is also no information regarding how members of the STAG will be selected?

Whilst Council commissioned a technical report from Tonkin and Taylor and also peer input and review, there are other credible experts and widely accepted international reports with views not necessarily aligned with the T&T report. It is recommended that alternative technical consultants are included within the STAG selected by community groups – not by Council - relevant to each Adaptation Area.

It is of concern that one of the roles of the STAG is to consider “..... *whether assessments align with the guiding principles.*” One of the guiding principles is to “Keep Managed Retreat on the Table” – the only Adaptation Option included as a Guiding Principle. The significant concern with this is that as the Framework notes that a proposed role of STAG is to ensure that pathways are “aligned with the Guiding Principles”, this clearly influences the assessment and recommended outcomes from STAG. By Council including Managed Retreat as a Guiding Principle, it gives an indication of a predetermined outcome sought. No other Adaptation Option is noted in the Guiding Principles and to retain trusted dialogue with community, I believe it needs to be removed as a Guiding Principle so that STAG can undertake their role to consider all Adaptation Options equally with no influence either perceived, documented or otherwise.

Again for Community to genuinely be at the heart of the discussion and for the credibility of the process, community must be part of the selection criteria and process for both the Coastal Panel and STAG with relevant and affected community groups selecting representatives and not Council.

Furthermore, to ensure the Coastal Panel can best represent the community and avail itself of independent advice – be it technical, legal or otherwise, it is recommended that funding is made available for the Coastal Panel and / or recognised community groups to avail themselves of such independent advice as it relates to the Adaptation process ie relevant experts not appointed by or utilised by Council.

Q2. Do you have any specific feedback on the proposed guiding principles?

I have several concerns regarding the Guiding Principles;

1. Under “Recognise inter-generational equity issues” it notes Council will “prioritise options and pathways that minimise the burden on future generations.....”. Whilst it is appropriate for future generations to be taken into consideration, by making them the priority, it may well do so to the detriment of current generations. I do not agree that this should be the priority. To do so could severely adversely impact on current residents during our lifetime - as has happened to Matata residents during their “managed” retreat. Personal, financial and emotional hardships were and continue to be experienced by a poor process with only an eye for future and little consideration for CURRENT generations. This can not be repeated in Christchurch.

The social, emotional and financial impacts of current residents needs to be given priority whilst providing appropriate outcomes for future generations.

It is also inconsistent with one of the guiding principles in MfE’s Preparing for Coastal Change Guidance which states “When planning for the future under uncertain conditions, it is important to also consider potential for the transfer of risk in the future, legal liabilities [not necessarily in the future] and the financial consequences of decisions to others, including [but not limited to] future generations.” In other words a consideration of, not priority is to be given to future aspects.

2. Re “Keep Managed Retreat on the table”. It is not clear why only this Adaptation Option, out of the 5 listed on Page 8, is specifically listed as a Guiding Principle. This is of significant concern as it indicates a strong preference and potentially pre-determined outcome to that option over others. Why? Isn’t the whole reason for this process to work through with the community to decide on which option/s is appropriate to each Adaptation Area? I believe this Guiding Principle should be removed and it be left as an Adaptation Option.

Furthermore, the significance of including this as a Guiding Principle is even more concerning reading that the STAG’s work might include; “assessing adaptation options and whether they align with the guiding principles”. So for example, a community

recommending a “Maintain” adaptation recommendation to STAG, could be over-ruled if STAG wanted to take a strict line in focussing on adherence to the Guiding Principle. They could be potentially left with no option but to recommend against what would otherwise be a preferred pathway simply because it didn’t meet the Guiding Principles “test”.

It is impossible to consider that Managed Retreat is not a strong/preferred focus for Council whilst it remains as one of the Guiding Principles to be adhered to throughout the whole process.

In summary, I believe it is inappropriate to have the option as both an Adaptation Option and a Guiding Principle and that it should be removed from the latter.

Since writing this, I have heard that Council advised at one of the community meetings, (when asked why Managed Retreat was the only Adaptation Option submitted as a Guiding Principle), that it is a requirement under the NZ Coastal Policy Statement. In reading that document, I cannot see where this specific requirement is made. All five Adaptation Options are reflected throughout the Policy Statement including in Policies 25 – 27 which refer to change of land use (“Avoid”), soft and hard protections (“Protect”) and managed retreat.

So putting forward just Managed Retreat as a Guiding Principle also seems inconsistent with the Government’s Policy Statement.

3. Examples of pathways shown were an interesting pointer to Council’s thinking. The \$\$\$s noted appear to be indicative of a cost range to Council (rather than land owners) and acknowledging that these are examples, writing that “Land Use Restrictions” are “\$ Low”, fails to understand that restricting use is likely to be a significantly high financial and emotional cost to private land owners. This type of thinking needs to change. For private land especially, it needs to authentically take into consideration and reflect the potential impact on residents and businesses in Adaptation Areas.

Q.3 Is there anything you’d like to tell us about the proposed engagement and decision making process?

(i). It is important that the engagement with the community is genuine and transparent. Open and sincere collaboration and input between and from various community groups (residents, businesses, environment groups etc) including the Coastal Panel is important. To ensure the community is at the heart of the process, for community engagement beyond the Coastal Panel it is recommended that an independent facilitator be used with Council as an observer, fully able to focus on the impacted community’s experiences, past learnings and opinions, and able to respond to queries if required. “Community engagement” where audio visual presentations and standardised responses to any questions are the format (which at times may have their place), I do not believe will provide sufficient opportunity for feedback or be viewed as credible community engagement. A more involving process is needed (as it is stated is the intention).

(ii) Within the Framework document there is little information on the contents of Tonkin and Taylor Coastal Hazards Assessment that Council has commissioned and how it will be utilised throughout the Adaptation process. Furthermore, there are no links to peer review and other technical documents making it almost impossible to find key information on Council’s website such as the Jacobs peer review Q & As. Only after 2 emails and 2 phone calls was I able to access it. And then found it was presented in a format that without access to what each Reference number and their content refer to, was clearly designed for internal use only. I wonder how many others had the same problem and simply gave up without giving feedback. The short feedback timeframe (fortunately extended slightly) does not do justice to what is a complex, significant, long term impact and potentially life changing project.

(iii) It is of concern that the most extreme forecast of climate impact from greenhouse gas emissions in determining the possible future sea level (RCP8.5H+) has been included by Tonkin and Taylor as a reference point. The MfE 2017 guidance document from which it is sourced refers to this as “a higher, more extreme H+ scenario, based on the RCP8.5 (83rd percentile) projections from Kopp et al (2014) – included primarily for the purpose of stress-testing adaptation plans or pathways and major new development at the coast.

RCP8.5H+ is far beyond that recommended by the ICPP latest report (2021) and in which RCP8.5H+ is noted as “unlikely”. I therefore believe that RCP8.5 should not be used as the main point of reference for adaptation planning as stated and utilised by T & T.

Reflecting and utilising the most extreme projection in this way can have a significant adverse impact on residents eg in relation to LIMs, valuations, insurance etc and of course determining the most appropriate Adaptation pathway forward. Third parties, technical experts and the community may well rely on Council commissioned assessments despite them being different from other widely accepted climate positions.

It is also inconsistent with one of the guiding principles in MfE’s Preparing for Coastal Change Guidance which states that “A coastal hazard assessment should relate the hazard magnitude to its likelihood occurring...”

My view is that all 4 RCP scenarios should be given the same weighting at this stage and that the most extreme projection is not utilised as the main point of reference.

If the Adaptation process uses Signals, Triggers or Thresholds rather than dates for Adaptation actions, then the forecasts are less critical for the process than if specific years/dates were the determinant for actions. However, this is not a given. My preference is that the actual status of certain triggers such as sea level height are used and not forecast levels or time frames.

(iv) Lastly, the Framework document notes that the Government’s Climate Adaptation Act will be introduced in 2023 and will address the issues associated with managed retreat and clarify Government’s approach to any funding for the retreat or protection of private assets.

Whilst Council has noted it can change its Framework to respond to these legislative changes, the work being undertaken from now in Council’s Adaptation process may well be counter-productive to that. Additionally, it may be more difficult to adopt a different approach with several years of community engagement and Council input and planning to potentially undo – the horse may have already bolted, so to speak. It begs the question; would it be better to wait until the contents of the Act is known before progressing on the Adaptation process, saving precious Council funds that are already stretched?

M. Smart

[REDACTED]

5.12.21

To: Christchurch City Council
Attention: Katy McRae, Engagement

SUBMISSION ON COASTAL ADAPTATION FRAMEWORK

6 December 2021

THE COMMUNITY NEED MORE TIME:

Consideration of well-being has not been prioritised in this consultation process. The timing of this consultation given the stresses of Covid19 places greater burdens on our communities. A five week consultation period extended to 8 weeks, after the community requested an extension, is in disproportion to the length of time CCC staff have had to collate and prepare for these complex conversation. Communities are being unduly pressurised to produce their feedback in a hurry as CCC have left this conversation to the 11th hour and now we are told they have a deadline to meet. CCC could have instigated these conversations a year or two ago, they did not. Why not?

As a consequence, these coastal communities, as a whole have not been made fully aware of these conversation and at close of submissions the majority are still completely unaware. This is totally unacceptable for conversations of this magnitude. Not even the very effective communication of a letterbox drop was undertaken. I'm sure Residents Associations and key community groups would assist with this if given the resources to do so. The implications and outcomes of CCC's proposed changes to the District Plan planning rules will potentially be more restrictive creating a ripple on effect:

- Reduction in house prices and or could make it more difficult to obtain mortgages
- Higher Insurance premiums and/or partial or full withdrawal of coverage
- Increased regulations and restrictions for new builds
- Make it more difficult to do renovations and alterations to existing homes
- Resulting in negative effects on community health and wellbeing

These potential impacts have serious consequences and our communities deserve and need more time so that we can avoid "surprises" that is, new District Plan policies with rules that suddenly appear and are implemented without communities having any knowledge of the change until it's too late. We had that happen with the RUO in Southshore etc and CCC need to avoid that situation again at all cost.

I request, and it is imperative that this process for the Coastal Adaptation Framework be paused for the Christmas break and continued in the new year. The feedback for our communities needs to continue until at least March 2022 to enable more time for us to be informed, digest and understand the process, technical data and potential implications.

TRUST:

It was mentioned by CCC staff at one of the public consultation evenings that CCC are wanting to 'restore trust' between Community and Council.

Residents confidence and trust in Council presently is at its lowest. My mother taught me that when it comes to discerning whether you could trust someone - "actions speak louder than words!"

Let me reflect...would Southshore or South New Brighton say "yes CCC came through" with regards to their Estuary Edge earthquake repairs? No! they have not. Still waiting! There are no excuses for this lack of action on Councils part and the continual delays.

This is shameful. Shameful that these communities had to fight for 8-9 years just to be heard. Shameful that once heard in June 2019 and a CCC resolution passed (Council Resolved CNCL/2019/00074) no earthquake estuary edge repairs completed as yet. Council staff were instructed to "undertake urgent work on the earthquake legacy investigations project and report back in August 2019 for Council decision..." Surely,

urgent action follows urgent investigations. These communities are supposed to be assured that work will begin in 2024, however, it was said at one of the public meetings that resource consenting was complex and is a long process. Not good enough! CCC you have had plenty of time to sort this out by now.

These communities made it quite clear that the Coastal Hazards adaptation conversation would not be entered into until the Earthquake damaged estuary edge repairs were restored and repaired. Two and a half years on and CCC is expecting these communities to engage, I don't think so.

My point is this: with that example of a very poor track record how are our communities supposed to trust Council with and through this process? They see a repeat.

Which leads me to a way forward.

COMMUNITIES BEING EMPOWERED AND RESOURCED

CCC have indicated they want to be open and transparent.

I request that for this to happen, as it has not, the community must have the opportunity to be resourced to engage their own independent experts to work with CCC's chosen experts and to also be able to peer review any reports and technical data being used by Council in these processes. Why has this not happened? And at times when requests have been made for community involvement or for information they have been refused. Why?

I request that this process is paused until this has been actioned. This relates directly to the communities lack of trust issues with Council and must be instigated immediately for a more positive outcome for all.

FOUNDATIONAL DOCUMENTS:

The foundational documents e.g. Tonkin & Taylor report will inform both the Coastal Panel group and Specialist and Technical Advisory Group. It is paramount that these coastal communities select their own technical experts to critique these foundational documents to ensure community confidence in the process.

I request that this is adopted.

THE COASTAL ADAPTION FRAMEWORK PROPOSED

From my personal experience as the previous Chairperson for the Coastal Burwood Community Board 2016-2019, this is another version on the HOW team consultation process- Coastal Futures. This occurred between, Regenerate ChCh Ltd, CCC staff and Southshore and South Brighton residents for the Estuary Edge Earthquake Legacy issues. This Coastal Futures process cost a considerable amount of money, was **not successful** and failed these communities. **I request** that CCC do not repeat that process.

The proposed composition of the Coastal Panel groups have not been discussed with our communities. The panel must be weighted with local residents 75%-80% and the rest of the remaining group members picked by them. It is inappropriate to have panel members from other parts of the city on the panel just as the reverse would be inappropriate.

The proposed composition of the Specialist and Technical Advisory Group (STAG) must have 50% chosen by community to assist with the trust issues.

CITY WIDE CONTEXT:

It is of concern that there is no city wide context to enable perspective with regards to Coastal Hazards for the whole city. I understand that the Coastal Hazard (CH) conversation needs to happen with the Coastal communities, however, as usual coastal communities have the spotlight on them which gives a false

impression that sea level rise does not affect the city as a whole. E.g. as you know, if we were to have a 1m sea level rise, the majority of Christchurch city will be under water.

No context unfairly brings inaccurate assumptions and perspectives for the coastal communities.

I request that the whole city mappings and predictions regarding sea level rise, flooding and ground water levels ,be shown for context.

FINAL COMMENT:

It was sad to hear a young resident leave one of the public meetings with the impression from the CCC presentation which was “I did not hear how they are going to help us stay and live here, only how they are putting things in place to move us out”. CCC, our communities well-being needs to be top priority through this process. Please shift from a doom and gloom approach to one of hope that assists our communities to thrive. Our coastlines are to be celebrated and enjoyed NOT feared!

I also support the submissions of the group listed below on both the Coastal Hazards District Plan Change and the Coastal Adaptation Framework

- **North Beach Residents Association**
- **Waimairi Residents Association**
- **Southshore Residents Association**
- **Christchurch Coastal Residents United (CCRU)**

Thank you
Kim Money



Brian Sandle Submission to Christchurch City Council on

Coastal Adaptation Framework and Coastal Hazards District Plan Change

From: Coastal Adaptation Framework Prioritise natural and nature-based options

“We will identify and prioritise natural and nature-based options wherever feasible, in preference to any hard protection options. This is in line with the New Zealand Coastal Policy Statement 2010 which recognises that natural options provide additional benefits including protecting and enhancing the natural environment and taonga, and maintaining and creating recreational assets. Examples of natural and nature-based adaptation options can be found in the Catalogue of Coastal Hazard Adaptation Options.”

From: Coastal Hazards District Plan Change

“Effectiveness in enabling people and communities to provide for their social, economic and cultural wellbeing and their health and safety Option 1 enables subdivision, land use and development in areas of risk where the effects of coastal hazards can be adequately managed. In areas of lower risk, this option provides for the ongoing use of land and development until such time that the risk emerges i.e. sea levels reach a defined point. In doing so, it enables people to provide for their social and economic well-being.“

Economic Analysis:

I ask for the Framework and Plan Change to have a more detailed economic analysis. “Economic wellbeing” would seem to refer to sections being subdivided and sold. That must include being sold to people who have to move. Profit would be going to the providers of the process including the building sector. In some circumstances Three Waters investors will profit as increased services are required. I believe our government intends to borrow using Three Waters as security. So it may not want to approve one solution I suggest below.

Social Wellbeing analysis:

I also ask for a “social wellbeing” analysis. That might consider an optimum population density in which people may tend their gardens, do hobbies, practice music daily and perhaps be insulated from sounds of neighbours' TVs and heat pumps. Beyond a certain density stress will occur which is claimed to be as bad for the heart as smoking, and possibly make people have to give in to extra control by authorities. And, going back to the economic analysis, such stress may feed the extremely powerful medbusiness sector. So that sector may also oppose my suggestion, I hate to say.

Allow subdivision of rural land to 0.2 ha sections, and take 0.036% of all NZ farm land, that would be 0.00036% of NZ farmland per year when it has already been decreasing at 0.75% per year.

“The total land area of farms in New Zealand decreased from 15,589,885 to 13,561,175 hectares (13.0 percent) **Between 2002 and 2019”** <https://www.stats.govt.nz/indicators/farm-numbers-and-size>
The CCC Coastal Hazard Assessment says “25,000 properties that could be at risk from coastal

hazards in the next 100 years, most commonly from coastal flooding.“

I calculate 25,000 0.2 hectare sections would take up 5,000 hectares.

Dairy farm area in North Canterbury is about 199,288 hectares so 5000 hectares would be 2.5% of the dairy farm area.

<http://www.siddc.org.nz/about-siddc/south-island-dairying/>

And noting that many places won't be affected as much as Christchurch.

2.5% over 100 years would be very much less annually at 0.0025% than the Minister for Environment wants to decrease dairying.

Enhancing the natural environment.

I maintain the principle should not stop at the coastal area but also apply to the new housing areas.

A 0.2 hectare section should be required to have 0.1 hectare in indigenous NZ trees/vegetation, vastly improving natural environment on dairying as it is today. It could have a two or three storey house which would not take a great deal of the remaining 0.1 hectare

Facility considerations

*The bush and house would provide shade and shelter from drying winds so conserving water.

*Wastewater could be pumped at pressure through cheaply reticulated narrow piping to local treatment facilities and back to bush areas.

*more solar power per house would be available than in a high rise urban setting with shading,

*many internet facilities are already provided through wireless, so phone cabling would not be required,

*Sections could be 3 deep for example alongside existing rural roads. If the frontage were 20 metres then three houses on each side of a road could require 83 km of existing roads or 5 km each of 16 roads out of Christchurch,

*CO2 budget economical transport could be afforded by ride sharing co-ordinated by existing cellphone technology gocarma.com a sort of non-profit form of Uber.

Disadvantages

I have tried to introduce these ideas years ago in the Greater Christchurch Urban Densification Strategy, and later Regional Plan considerations. A comment from a senior ECAN planner had been that new technology could not be taken into account. There may also be economic disadvantages to certain sectors or government as I have said above.

I hope some of these ideas may be canvassed if CCC joins with other councils to oppose Three Waters. Property market may change: consider offering only to people losing land.

The advantage my way would provide in terms of earthquake and pandemic resilience could be seen as a cost to the business sector, and may not fit into Agenda 2021 and Agenda 2030.

Thanks from Brian |Sandle

Submission on Coastal Adaptation Framework

Submission made by Megan Jane Roulston, [REDACTED]
[REDACTED]

If there is an opportunity to speak to this submission I would like to be heard.

Introduction:

I would like to thank CCC for engaging with communities early on the proposed Coastal Adaptation Framework. The effort involved is greatly appreciated, whilst there is always room for improvements it is evident that this is a huge step forward in Council proactively seeking feedback before entering the adaptation conversation. So thank you to all involved.

SSRA and BOEE have made a submissions on the Coastal Adaptation Framework and I fully support and agree with comments made in those submissions.

In my opinion generally the framework is a step in the right direction for engagement however I note:

- My community (Southshore/South New Brighton) is unable to enter a conversation about adaptation when we are still awaiting earthquake repairs to our estuary edge erosion and flood protection. This overdue work must be completed urgently before adaptation conversations start. Interestingly I note in the CCC document titled “Catalogue of Coastal Hazard Adaptation Options” states that “Inundation and erosion issues in Southshore and South New Brighton after the 2010/2011 Canterbury Earthquake Sequence have been addressed”. This is not true. Whilst a solution has been agreed between community and Council, until the work has actually been implemented inundation and erosion issues have not been addressed.
- There is an enormous amount of information to digest. Not enough time or opportunity to ask questions. The meetings were a very good first step, but should be considered a first information step followed up with a questions session. The meeting I attended gave good high level information but very little detail. It also covered two huge bits of work – the adaptation framework and the plan change approach. There was not enough time for people to digest the information, formulate their ideas/questions and then actually have their questions heard and answered. A two-pronged engagement would be better, where the initial meeting is the information sharing and a second meeting is to answer questions. This would allow time for people to share information in their communities gather questions/concerns and then get those questions answered.
- **The coastal community panels** CCC feedback asks for input on the makeup of individual coastal community panels, both who, and how many. It is disappointing that before the submission closing date, the Lyttelton expressions of interest page contained a TOR (draft), that already indicates how the group will be structured. This does not give communities confidence that our input will be genuinely considered. I agree with the SSRA comments regarding makeup of Coastal Panels.
- While I broadly agree with the proposed Coastal Panel and STAG, there is much detail missing. For example:
 - the framework states a preliminary assessment of adaptation options to consider their effectiveness, feasibility and environment impact, and whether they align with the guiding principles. **Who determines the criteria, and how is the criteria determined for whether something is effective or feasible?**

- The Coastal Panel will do much heavy lifting for their communities. How will those people be supported; considerations need to include their emotional/mental wellbeing as well as financial compensation/honorarium for time
 - I do not see the need for wider city representation to be involved in the Coastal Panels. If it is insisted that wider city representation is required then communities affected should have a say/vote on who is appointed from outside their community to sit on panels. No other communities have such scrutiny over planning e.g. suburbs at increased risk of wildfires or hillside suburbs at increased slip/erosion risk don't have the same level of scrutiny and planning, though those areas will also be affected by climate change.
 - I would like Coastal Panels and STAGs to be evaluated as they go, so that learnings can be taken from each community adaptation conversation into the next community adaptation.
 - The Coastal Panels and community input should be at the 'collaborative' end of the IAP2 engagement model.
- **No opportunity to provide feedback on the foundation documents.** The framework feedback is centred around the process and the conversation. The conversation is centred around interpretation of the data and the response to it. All information for adaption and planning is based on the T&T report - the community is concerned that they have had no opportunity to ask questions, discuss, and feedback on any issues regarding this report. The community needs to have the opportunity to have a closer look at the T&T report to have confidence in the information. Communities will require some expert assistance to do this.

Guiding principles

- Develop local plans for local communities and environments is a sound principal. Choosing the right option for a particular location can be difficult, and it is important for solutions to have the right fit for the, location and the community. Solutions should be evidence-based and tailored to the risk and local values of the area. We need to be able to update risk assessment and planning based on incoming data. Build resilience by supporting residents, business owners and the community to be 'risk aware'. Align 'build back better' principles with existing scheduled asset replacement activities.
- Recognise inter-generational equity issues. Yes, adaptation has a cost that should be spread across generations, it should not solely be the cost of future generations but equally it **should not solely be the cost of current generations when the risk we are planning for is uncertain.**
- I object to "keeping managed retreat on the table" as a guiding principle, this actually gives the impression that managed retreat is the sole focus. A guiding principle for climate adaptation should read "**We will consider all options for managing risks**". Given managed retreat is one of the adaptation options it is by default captured by this inclusive guiding principle. Whilst I understand you are trying to be 'upfront' that in some situations managed retreat might be the outcome, it is not true for all communities and having it as a guiding principle gives an impression that it is a predetermined pathway.
- I do not understand the purpose of the guiding principle 'Focus on public assets that contribute to the health, safety and wellbeing of communities.'" I believe Council has an obligation under the Local Government Act to support resident's and community well-being and I don't think the wording of this guiding principle supports this. I object to this principle as it is written.

Conclusion

This is a good start in the adaptation process. Thank you for taking time to seek feedback early in the process and I hope the feedback is taken on board and that we can continue to work in a collaborative way. This new approach is appreciated.

<p>“Have your say” https://www.ccc.govt.nz/haveyoursay</p> <p>Christchurch City Council Coastal Hazard Adaption Framework</p>	<p>First name: Jan Last name: Burney Phone: 0275129928 Email: chrgary.jan@xtra.co.nz Address: 3 Beacon Street Suburb: Brooklands CityTown: Christchurch 8083</p>
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Jan Burney: 5 November 2021

Coastal Hazard Adaption Framework

<https://ccc.govt.nz/the-council/haveyoursay/show/456>

Defining terms that allow for a flexible approach is paramount to avoid a fixed strategic outcome. An equitable, acceptable, and sustainable outcome can only be achieved for communities when legitimate processes are followed.

Definitions that are too “tight” restrict evaluation and may be perceived as predetermining outcomes.

Coastal Adaptation Framework

CCC :Term Definition: page [4]

<https://ccc.govt.nz/assets/Documents/Consultation/2021/10-October/Coastal-Adaptation-Framework.pdf>

“Adaptation: The process of adjusting to change. In human systems, adaptation seeks to moderate or avoid harm or exploit beneficial opportunities.”

1. Allow for consideration of differing future possibilities and changes, robust analysis and importantly a flexible approach to preferred options.

That the “preferred options” are not just the Council preferred option and worked through from that decision but are formed together with considerations from the community.

“Signals, Triggers and Thresholds”

2. These three points need to be clearly identified to the community for a response to adoption of new approaches. The signals, triggers and thresholds include community identification and tolerance of what will be accepted, and, decisions made before

tipping points have been reached. Listen to the communities and show action is being taken.

Adaptation options:

“Maintain: We enhance what we’re already doing”

“Accommodate: We live with the hazard”

“Protect: We keep the hazard away”

“Central Government is currently replacing the Resource Management Act (1991) with three new laws, and has indicated that one of these, the Climate Adaptation Act, will be introduced in 2023. This new Act will address the complex legal and technical issues associated with managed retreat and funding and financing adaptation. It is anticipated that the Climate Adaptation Act will clarify Central Government’s approach to any funding for the retreat or protection of private assets. Although this clarity is not available yet, we think it is essential that we start this process with communities sooner rather than later.”

3. Communities still need security, protection and action prior to central government decision making in the intervening period and for immediate futures.

There needs to be a confidence and trust in Council that shows there are tangible enabling mechanisms and funding in place that allows for opening up opportunities and adaptive pathways to support planning and action – now – as well as long term adaptation planning.

“Keep managed retreat on the table

<https://ccc.govt.nz/the-council/haveyoursay/show/456>

“We will consider all options for managing the risks posed by coastal hazards for communities, including managed retreat. This is in line with the New Zealand Coastal Policy Statement 2010. While managed retreat is a challenging adaptation option in terms of implementation, and social and economic impacts, it offers a long-term sustainable option that can remove the risk of coastal hazards, allowing natural coastal processes to unfold. It can also be used to create natural protection buffers for other at-risk assets”.

4. The above appears to be taken straight from the “red zoning” future use documents.

<p>22 July 2014 Cabinet Paper Residential Red Zones: Future Use-paper to cabinet signed 22-07-2011 “Hydrology”</p>

22. *Red zone land provides an opportunity to manage flooding in some green zone areas. Conversely, the flood prone nature of certain parts of the red zone may limit use options in those areas. CERA and Christchurch City Council officials are working together to develop long-term flood management options for Christchurch City*”.

This is not Coastal Adaptation Planning but is a description of a Public Works acquisition.

“An option that can remove the risk of coastal hazards” - the Council here are defining private asset owners as the risk to be disposed of to enable use of their property for others gain.

Coastal hazards are physical processes with causative actions. Mitigation can alleviate the risks.

I am assuming the Council are making an assumption here that “mitigation” in the revised RMA will be removed? Predeterminate indicators do not add to trust.

“Roles and responsibilities

“While the Council, on behalf of the community, is responsible with Environment Canterbury for managing risks posed by coastal hazards and is responsible for managing the risk to Council owned assets and income, the Council does not have an explicit legal obligation to protect privately owned assets from coastal hazards. Private asset owners (individuals, organisations, businesses, and iwi who own built structures on private land) are responsible for managing risks to their assets and incomes. The private asset owner’s role is to: • Be aware of the risks and their responsibility for managing them. • Comply with regulations that apply to their assets and activities. • Take steps to understand the magnitude and nature of the specific risks to their assets and activities. • Develop and implement strategies and actions to manage these risks. The Council’s role is to: • Prepare and implement civil defence and emergency management plans. • Develop and implement plans, policies and regulations for the identification and management of coastal hazards. • Facilitate the building of resilience and adaptive capacity within communities including providing information about known risks posed by coastal hazard. • Where appropriate, work in partnership with communities to identify and manage the risks posed by coastal hazard and their impacts”

5. The Council District Plan disabled private asset owner’s ability to fully manage risks by controls in high/multi hazard areas restricting mitigation. A “catch 22” situation and a strategic predetermination.

Jan Burney

**Issues and options paper on Proposed District Plan Change and the
Coastal Adaption Framework SUBMISSION – T & J Sintes**

1. Tonkin & Taylor Coastal Hazard Assessment:

The CCC used the Tonkin & Taylor Coastal Hazard Assessment for Christchurch District 2021 Report as the foundation document to inform the plan change, LIM notifications and coastal adaptation framework. From this report the Council advised they intend to use RCP8.5 as the main point of reference for Council's Coastal Hazard's Adaptation Planning programme T & T state "The intended purpose of the Tonkin and Taylor report is to assist **adaptation planning**." It is therefore not fit for the purpose of a plan change or LIM notations.

Furthermore, this report is based on the IPPC 2014 Report. However, IPCC have since issued a later report (IPCC 2020) in this they state that the modelling which T & T have used, namely RPC 8.5 is 'implausible' and an unlikely scenario.

T & T and CCC have an obligation to the city to employ the latest up-to-date information available for any planning purposes.

Based on T & T modelling, the maps on the Council website show areas at present time of being 1m underwater in a 100-year flood – we have had this flood already and despite faulty stormwater outlets, our area in Southshore and other areas were not 1m underwater as shown. Therefore, if the modelling is already incorrect at the present day it will be incorrect for all time based on a poorly modelled trajectory showing incorrect assumptions.

2. Community Consultation:

At the meeting in Sumner on 27th October which I attended, the Council representatives explained their errors of the past, regarding community engagement would not be repeated; - to date I have seen no evidence of this, in fact it has been quite to the contrary.

The Council has been working on this for over a year, however the community is expected to attend meetings, read & understand all the information & submit on this in a matter of weeks. While a small extension of time has been granted at the communities' request, given the time of year (ie 3 weeks before Christmas) and the huge amount of technical information to read & understand and possibly the need to engage legal counsel, this is simply a repeat of Council's error of judgment in the past and definitely **not** acceptable for decisions of this magnitude for our city.

These matters affect over 25,000 homeowners who will be significantly impacted by way of insurance, depreciation of asset, loss of community facilities and detriment of emotional wellbeing.

I am speaking from the experience of the draconian rules & regulations imposed on the Southshore area over the past decade.

A request for community involvement in the working group at the start was denied and now when requesting information, we are told that the Council is basically too busy to keep answering our questions.

What a fob-off and it appears once again the Council regard community engagement as a 'tick-box' exercise to be completed in as short a timeframe as possible.

When questioned at the meeting when the notations were to be put on the 25,000 homeowners LIMS I (and everyone present) was amazed to hear that it would be within 2 weeks of the submissions closing!! Hardly community consultation when it has already been decided & the public is totally unaware of this. The Council appears to be heading down exactly the same path as last time.

3. Options:

The Council has put forward 4 options of which their preferred option is “Risk based approach”. based on an overly cautionary scenario.

I would like to see an option for an adaptive management approach to the risk, involving monitoring changes over time.

In Southshore we have been classified as having high flood areas & hazard notations have been already put on our LIMS without being given the chance to object. This has severely impacted on our community and indeed without the Residential Unit Overlay (RUO) ruling by the Independent Hearing Panel our community would be in a very different state now, whereby any development would have been effectively stopped.

Residents have had ridiculous rules imposed by CCC simply to be able to build or do alterations. ie: Put in a high window (which would need a ladder to reach) so you can climb onto the roof to be rescued by helicopter, not allowed to park in their driveway so rescue boats can reach them, made to construct a bicycle shed (even though they didn't own a bicycle) in order to bike away through the floods, but to name a few!! One resident was told by Council staff that they are flooded every high tide – it beggars belief!!

We have lost our local commercial centre, bar, fish & chip shop, dairy, hairdresser etc.

Language such as ‘Avoid redevelopment’; ‘significant risk’; ‘prone to’; ‘potentially affected’; ‘high risk’; ‘likely effects of climate change’ etc. etc.... gives the community no clear direction or degree of likelihood or confidence in the Council, rather it will be at the discretion & the interpretation of the Council staff at that time.

It does not bode well when people are unable to have clear direction of what they can or cannot do with their land or house alterations unless they go through the costly Council application processes. There should be ongoing monitoring and policies based on what is actually happening not what is ‘potentially’ going to happen & mitigation could be put in place over time.

We in Southshore are still patiently waiting for our promised estuary edge repair due to earthquake damage while the Council continues to map the erosion. Our community cannot accurately make plans until the estuary edge repair process has been completed, as this will hugely impact on how our community is protected from sea level rise.

4. Ground water levels

Ground water planning should be based on city wide maps. Any planning should be long term & not part of the Coastal Hazard chapter as the whole of the city is impacted.

SUMMARY:

Our main objection is that the foundation report (namely the Tonkin & Taylor Coastal Hazard Assessment for Christchurch District 2021 Report) is not based on the latest IPCC data and the modelling is flawed. As stated in the report, it is for adaptive management planning only and should not be used for plan change purposes or LIM notations.

The RCP8.5 which the Council is intending to use as the main point of reference, is overly cautious and according to IPCC a highly unlikely scenario. It does not take into account any future technological developments, but will only serve to stop progress and stifle communities.

Risk decisions are being made based on desk-top modelling which we considered to be flawed, and real-time adaptive planning management has not been considered as one of the options.

Sadly, despite saying the contrary, the Council have displayed a total lack of transparency & lack of engagement with affected communities during the development of the new framework and proposed District Plan changes. Community involvement has been denied and models &

data have not been made available for review, all of which leads to the familiar closed-door scenario and feelings of mistrust with Council.

Previously the Council decided on an extreme scenario & attempted to fast-track the planning process with no public awareness which left thousands of homeowners with hazard notations on their LIMS which now cannot be removed. This process seems to be headed in the same direction.

I implore the Council to do it differently this time and give our community time, which is essential given the magnitude of the resulting implications of their decisions – please do not rush this important process.

Because we have been denied inclusion in the planning work to date, it is unreasonable to expect the community to have enough understanding or time for submissions within the timeframe given. We believe this process needs to be done over a much longer period of time to begin early 2022.

Lastly, I support the submissions from the Southshore Residents Association (SSRA) and Christchurch Coastal Residents United (CCRU).