

**From:** [BDC Lgoima](#)  
**To:** [REDACTED]  
**Subject:** Official information request for Submission to MfE - Community Led Retreat Ref: OIA 112/23  
**Date:** Tuesday, 7 November 2023 11:43:00 am  
**Attachments:** [231026 - Selection Committee Submission - BDC Community-led Retreat & Adaptation Funding.pdf](#)  
[image006.png](#)

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Dear [REDACTED]

Firstly, apologies for the delay in replying to you regarding your email of 1 November where you requested the following:

*Could you please send me a copy of the BDC's submission to the Ministry for the Environment re Community Led Retreat as prepared by Di Rossiter.*

Please find attached the requested submission document.

We have lodged this as LGOIMA request, which is now completed.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

If you wish to discuss this decision with us, please feel free to contact the Buller District Council by return email to [lgoima@bdc.govt.nz](mailto:lgoima@bdc.govt.nz).

Please note that it is our policy to proactively release our responses to official information requests where possible. Our response to your request will be published shortly at <https://bullerdc.govt.nz/district-council/your-council/request-for-official-information/responses-to-lgoima-requests/> with your personal information removed.

Kind regards

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26 October 2023

## **Environment Select Committee Inquiry into Community-led Retreat and Adaptation Funding**

### **Buller District Council Submission**

#### **Introduction**

Parliament's Environment Committee (the "Committee") has opened an inquiry into options for community-led retreat and adaptation funding.

The committee's Inquiry into Climate Adaptation is exploring how Aotearoa New Zealand could enable communities to relocate from areas at high risk from climate change, including before a disaster happens. It is also looking at how the costs of adapting to climate change could be met.

The inquiry is open for public submissions until the new Parliament reconvenes after the election.

For the purpose of its inquiry, the Committee is particularly interested in:

- The current approach to community-led retreat and adaptation funding, its strengths, risks and costs
- Lessons learned from severe weather events and natural disasters in Aotearoa New Zealand for community-led retreat and funding climate adaptation
- Effective mechanisms for community-led decision making
- The role of the private sector in managing climate risk
- Potential institutional arrangements, including roles and responsibilities of central and local government agencies, iwi and hapu
- Māori participation, Crown obligations, and how to best give effect to the principles of te Tiriti o Waitangi, and integrate matauranga Māori and te ao Māori across the adaptation system
- Alignment and integration with existing legislation and regulatory framework, including the reformed resource management system and any changes needed to regulatory powers and potential economic or other incentives needed to support adaptation actions (both before and after extreme events)
- Funding sources, access to them and principles and criteria for cost sharing
- Targets or indicators for assessing progress to more resilient communities and infrastructure.

#### **Context**

The Buller district is extremely susceptible to climate change and is vulnerable to all ten 'most significant' risks identified in the National Climate Change Risk Assessment, 2020, due to the following reasons:

1. Extent of Exposure and Vulnerability – volatile and dynamic natural environment
2. Wellbeing and Mental Health – compounding on existing climate related events
3. Community Demographics – extremely low socio-economic profile

4. Local Economy – uncertain futures across multiple traditional sectors
5. Capacity Constraints – stretched resources

Buller’s vulnerability has been recognised within the Hon. Kieran McNulty’s 2022 report titled “Vulnerable Communities Exposed to Flood Hazard”, which assessed community and district vulnerability based on socio-economic vulnerability, flood hazard exposure, and the community’s ability to pay for its adaptation needs. In fact, it is recognised as one of the seven most highly vulnerable districts in Aotearoa.

The district has experienced several significant flooding events throughout its history. These historic events together with the extensive erosion and sea inundation of coastal townships across the district, Cyclone Fehi and storm surge damage in 2018, and the extensive Westport and district-wide flood events of 2021/22 have shown an increasing exposure and vulnerability to natural hazards across much of the district.

The Buller District Council (the “Council”) estimates that more than 20%<sup>1</sup> of Buller’s population reside in homes and/or on properties that are already exposed to significant effects of climate change, either from river flooding, sea-level rise, or storm surge events. Through Council’s climate change risk assessment process, University of Canterbury researcher Dr Tom Logan has found that around 30% of the district’s roads are exposed to landslides, with more than half of these at high risk.

Earthquake events and subsequent liquefaction would exacerbate exposure in many cases. The risk assessment also found that, of the district’s building stock, 64% of the residential buildings in the district are moderately or highly threatened from liquefaction, and given the majority of these are coastal, there is significant risk to these homes from rising groundwater levels and the associated risk to infrastructure and health.

As a proportion of total district population, Buller residents are one of the most exposed populations in the country. This creates significant psychosocial vulnerability within our community, heightened currently by cumulative stress caused by the district’s significant flood-related disaster events. We also have the lowest level of formal adult education and lowest median household income in the country, the highest proportion of the population living on supported living payments, and the largest proportion of our population within the 65+ years age bracket (23% compared with the national average of 15%). This combination of high socioeconomic deprivation and aging population increases the risk of adverse health and wellbeing effects in response to natural hazards and disasters.

In the year following the district’s July 2021 and February 2022 flood events, a district-wide wellbeing survey<sup>2</sup> (with 488 respondents) showed that there was an increase in mental and physical health issues and a sense of isolation and loneliness across the district. There was considerable evidence that some children were struggling and displaying anxious and disruptive behaviours. The survey also showed a sizeable minority whose needs were still to be met, including support with finance, housing, and physical and mental health. Concerns caused or exacerbated by the flood included:

- Financial worries (43% of respondents)
- Physical health problems (31% of respondents)
- Mental health problems (24% of respondents)

Council’s Social Recovery Manager (established post July 2021 flood) and current CDEM Welfare Manager, Steph Newburry, has anecdotal reports – two years post disaster – of local NGO social services providers experiencing an increase in waitlists due to both an increase in demand and the complexity of cases requiring longer and more complex interventions. Specific comments from the

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<sup>1</sup> Based on figures taken from Westport’s Community Hub, past flood and storm surge data and population projections of vulnerable coastal dwellings.

<sup>2</sup> [Buller Wellbeing Survey Summary of Key Findings 12.2.23.pdf](#)

community include feelings of “*being in limbo*”, that they “*don’t know what to do*”, and they feel like they are “*sitting ducks*”.

The challenges that Westport and the wider district faces therefore speaks to the critical importance of proactive adaptation, wherever this is possible, and the basic human psychological need to find certainty when disaster strikes.

It is this Council’s opinion that central government has a very important role in enabling proactive adaptation; through the establishment of an enduring system to enable retreat before a disaster, and an equitable approach to adaptation funding that recognises the complex social and financial vulnerability that exists within some of New Zealand’s most climate exposed communities.

### **Council’s Response to Specific Questions**

Council has significant interest in the outcomes of the inquiry and, as the local authority for one of only a handful of districts facing post-disaster adaptation, believes it holds valuable information to support the process.

In the interest of ensuring relevance in its submission, Council has restricted its response to questions that are either directly related to the district, or where Council has specific lived experience that can genuinely inform the inquiry.

#### **Question 1: Do you think we should use the term ‘community-led retreat’? If not, what do you think we should use and why?**

The term ‘community-led’ implies there is a collaborative effort being made to ensure the adaptation decisions are made with or by the community. The implication is that the complex process that is required prior to a final decision to retreat will be led by the community. The Issues and Options paper explains that ‘community-led retreat’ is a process which “involves community...at every step”. This is very different to a process led by the community and may introduce expectations regarding ‘who decides’, particularly where risk exposure levels become intolerable to Council and central government, but not necessarily to the community.

Within Buller’s communities, there is a wide range of perspectives regarding climate change hazards and the need for adaptation and eventual retreat. At one end, there is climate change denial, with some community members believing the July 2021 flood could have been avoided by regular river dredging and that the long-term prospects for Westport’s current location are sound. At the other end are feelings of extreme anxiety and angst whenever rain is forecast, a strong desire to leave the district, and feelings of being trapped due to an inability to sell flood-vulnerable homes.

Given the description provided within the Paper, the terms ‘community-informed retreat’ or ‘managed retreat’ would be more appropriate and less disingenuous, would avoid setting an unrealistic expectation that the final retreat decision resides with the at-risk community, and would also work better in situations where community perspectives vary greatly.

#### **Question 3: Are there other issues that affect the quality of risk assessment and local adaptation planning? How can we strengthen our approach?**

Throughout Buller’s risk assessment process, Council has been faced with critical decisions regarding modelling and data gaps and the prioritisation of significant spending to address these. Council has provided significant budget to the climate risk assessment and adaptation planning process (i.e., >\$550,000 over 4 years) and co-funding through MBIE has significantly increased this budget (i.e., total risk assessment and adaptation planning budget is \$780,000). However, the district’s complex climate hazard scape requires significant investment to adequately model and understand the full range of natural hazards, at a granular level, that put our communities at risk, and the available budget is not sufficient to address all hazard information gaps.

Council has also faced significant challenge securing already available hazard modelling and data from research institutes in a timely and supportive manner.

Council requests consideration be given to funding and enabling access to hazard modelling and data for territorial authorities with limited income streams and wide ranging, complex natural hazard profiles. Additionally, Council proposes the following approach:

1. Central government develops a nationally consistent geospatial multi-hazard risk assessment and mapping tool with standardised methodologies available for each natural hazard model.
2. Central government, in conjunction with local government, develops equitable and achievable funding models for sourcing essential hazard models.
3. Make the hazard mapping tool publicly available to enable communities and local government to work collaboratively and transparently in the development of responsive dynamic adaptation plans.
4. Set trigger levels, informed by the hazard risk assessment tool, for adaptation pathways, including managed retreat (e.g., risk of loss of life or significant and ongoing isolation).

**Question 4: Are there other issues that limit our ability to retreat in advance of a disaster? How can we improve our approach?**

Across Buller's communities, there are a range of perspectives on climate change and associated risk, from denial through to extreme anxiety. Dealing with complex and vulnerable communities can provide challenges to proactive retreat, particularly where anti-government sentiment or mistrust exist within marginalised populations.

Challenges with funding essential hazard modelling data can mean focus remains on the most evident natural hazard e.g., river flooding. However, less visible hazards (e.g., rising groundwater tables) must also be considered to build a comprehensive hazard scape and plan accordingly.

**Question 5: Are there other issues with the way we fund adaptation? How can we improve our approach?**

Across Buller district communities (particularly in the northern townships of Granity, Hector, Ngakawau and Mokihinui), there is concern and confusion regarding central government buy-outs of residential properties following Cyclone Gabrielle, against the backdrop of significant risk these communities have been facing for decades, including advancing coastal erosion, multiple storm surge inundation events, and landslide failure risk.

The ad hoc funding approach undertaken to date has set precedents and not unrealistic expectations for vulnerable communities, yet clear national policy is not forthcoming.

Dr Tracy Hatton, Council's climate adaptation engagement lead, has stated that *"this creates a very real challenge for local government who are tasked with leading climate change adaptation in their communities. Many local governments are following current guidance issued by central government agencies to undertake local climate change risk assessments, engage widely with their communities about the identified risks, and work with their communities to develop appropriate adaptation plans. This includes providing communities with reports or geo-spatial platforms outlining the severe risks faced within their districts, in the short-, medium-, and long-term future. Information is power, and we wholeheartedly support the necessity of local governments doing this."*

*However, the absence of any central government policy on managed retreat means that communities are defaulting to assumptions that the compensation precedents set by prior disaster support packages are likely to continue into the future. This absence of policy makes the assessment of and planning for adaptation options incredibly challenging for local governments."*



## Question 6: What do you think the costs are of failure to adapt well?

In post-disaster settings and in the absence of adaptation, Council has documented the following direct, indirect, and cascading 'costs' across the district:

- Reduced staff and community mental resilience, mental health, and physical health
- Increased mistrust of government and Council across the marginalised population
- Increased vulnerability within already vulnerable communities, because of reduced property values in flood-affected homes
- Stretched Council resources and staff across competing priorities, including BAU, disaster-recovery, and future risk and adaptation planning
- Increased pressure on Council governance (sometimes to unrealistic levels) to address growing and complex community needs
- Passing the problem into the future
- Lost opportunity to build a better future (for coming generations), founded in the concept of transformational adaptation
- Reduction in future economic investment

## Question 14: How frequently should a risk assessment be reviewed?

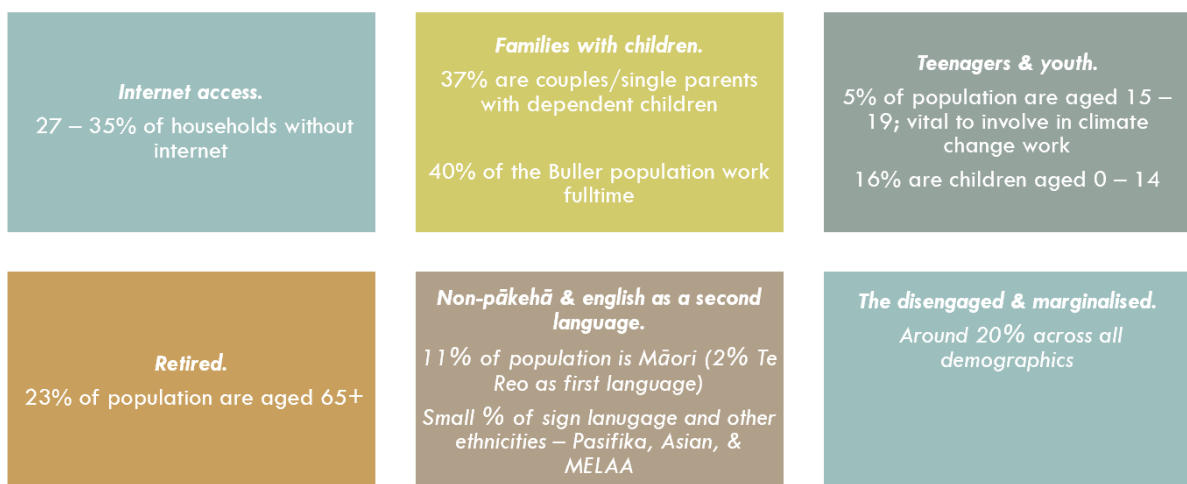
Dr Tom Logan has stated that:

*“Risk assessments should be living documents. Constantly updating them can help with the identification of signals and triggers for adaptive decision making”.*

## Question 16: Do you think local risk assessments should be carried out or reviewed by a centralised agency or a local organisation? Why?

A combined approach by both central and local government would increase process robustness.

Local government knows and understands its communities and its district, including the relationships and networks that exist across iwi, stakeholders, government, and communities, and where each community's strengths and vulnerabilities lie (Figure 1).



**Figure 1: High-level Buller community profile.**

Central government can lend consistency and rigour to the risk assessment process, by working with research institutes to standardise methodologies and modelling available.

A combined approach by both central and local government could then be applied to identify priority risks and prioritise adaptation.

**Question 18: Do you think there should be a requirement to undertake local adaptation planning? If so, should the trigger be based on the level of risk or something else?**

Proactive adaptation planning would help communities avoid the complexity that results from post-disaster adaptation planning. Ideally, this planning would occur before insurance retreat, the associated impact on the housing market, and decreased Levels of Service.

**Question 19: What direction should central government provide on the local adaptation planning process?**

Clear guidance is needed regarding who makes decisions on adaptation pathways and actions (including retreat) and how they are made.

**Question 20: Do you think there should be a requirement to plan for different scenarios, such as changes in the level of risk or what happens if there is a different disaster? Why or why not?**

Climate change is inherently uncertain. Even the most rigorous science and scenario modelling only shows us what could happen, but it does not provide a complete list of probable or even possible futures. We therefore need to get more comfortable with decision-making under uncertainty, and the dynamic adaptive planning approach inherently accepts and addresses this uncertainty.

**Question 21: How can we make sure that local adaptation planning is inclusive and draws on community views?**

By utilising the principles for engaging the community in adaptation planning, outlined in Figure 2.



**Figure 2: Principles to enabling effective adaptation planning community engagement.**

Information is power, for Council staff, climate adaptation practitioners, and communities.

Councils working with communities on climate change risk assessment and adaptation urgently need to know what central government support may be available for adaptation. This is so efficient and effective adaptation decisions can be made with all the information possible, even if the answers produced are likely to require tough conversations with affected communities. This information is also essential to enabling proactive, not reactive, planning and to avoid future post-disaster adaptation decision-making.

It is also important to help communities focus on what they value about the places in which they live, with the aim of retaining or replicating these values when retreat is required, rather than retaining focus on what will be lost.

**Question 22: Who do you think should make decisions about the adaptation pathway we choose and why? How should others be involved in the process?**

This is very dependent on level of risk exposure.

When faced with high levels of risk (e.g., potential loss of life), central and local government should make the decision on behalf of the at-risk community, based on the most up-to-date risk assessment and science modelling. In the case of moderate levels of risk, a dual approach between government



and community could be undertaken. Where risk is low, the at-risk community could be empowered to make the decision for themselves. However, there will likely be a range of perspectives within the community and government support and guidance may therefore be required in certain circumstances.

**Question 23: What do you think are the most important outcomes and principles for community-led retreat?**

One of the most important principles or outcomes for community adaptation and retreat is the need to not wait for disaster to occur before adaptation pathways, including retreat, are triggered.

Other important principles and outcomes include:

- Increasing physical and psychological safety,
- Ensuring equity between and within communities and generations – including avoiding passing the problem into the future,
- Involving communities in decisions that affect them, and
- Ensuring the circumstances are clear in which decision-makers are or are not legally liable.

**Question 24: Do you prefer option 1 (voluntary) or option 2 (a mix of voluntary and mandatory parts)? Are there any other options?**

Although a purely voluntary retreat supports autonomy and recognises the connection people feel to their homes and communities, Council agrees with the issues outlined in the Options and Issues paper, and would add the following two issues:

1. People and communities may elect to accept an increased level of risk, choose to stay in their homes, and then experience a natural disaster. Even though the choice to stay was made by the community, the cost burden of disaster recovery will still fall on local and central government, and the wider tax-paying communities. It could be argued that since the government and wider community stand to lose in this circumstance, they should have input into when retreat occurs.
2. A range of perspectives exist across communities, and it would be difficult to reach consensus across an affected community (particularly when whole townships are affected, as is in the case in the Buller district) about when to retreat in the absence of supportive regulatory mechanisms.

As such, Council prefers an approach comprising both voluntary and mandatory mechanisms.

**Question 25: Do you agree that affected land should no longer be used at the end of a retreat process (with limited exceptions for things like ceremonial events, recreation, some agricultural or horticultural uses and mahinga kai gathering)? Why or why not?**

Following retreat, it is important that the land is optimally managed in light of the particular characteristics and values attached to the abandoned land. For example, where appropriate, nature-based solutions (such as salt-marsh restoration around estuaries) can increase the resilience of remaining infrastructure and buildings, as well as provide important co-benefits including biodiversity uplift, carbon sequestration, and increased visual amenity.

In all circumstances, it should be up to communities to decide how best to use the land, provided it can be done so safely and viably.

**Question 27: Do you agree that these powers (i.e., compulsory land acquisition, power to retire land by cancelling its title – accompanied by compensation or financial support – are needed to ensure land is no longer used once a decision has been made to retreat? What powers do you consider are needed?**

Investment in residential property development has continued across the Westport flood plain post-disaster. Council currently has limited control over residential intensification across the Westport floodplain and in other at-risk communities, other than through RMA processes.

Although post-disaster adaptation is not ideal, it can mobilise communities to invest in development in lower risk locations. Council, and our communities, need clear and unambiguous regulatory mechanisms such as compulsory land acquisition and the power to retire land to drive better post disaster decision-making.

**Question 29: In what circumstances, if any, do you think decision-makers should be protected from liability? What are your views on option A, option B (Table 1) or any other possible option?**

**Table 1: Possible options for reducing liability (MfE, 2023).**

Options	Explanation
<p><b>Option A</b> Exclusion from all liability where decision-makers act in good faith</p>	<p>This is a broader exclusion.</p> <p>For example, decision-makers are not liable for:</p> <ul style="list-style-type: none"> <li>• negligence (a failure to take reasonable care)</li> <li>• harm arising from a failure to consider whether retreat is necessary (eg, where information suggested it might be).</li> </ul>
<p><b>Option B</b> Exclusion from all liability where decisions-makers act in good faith, except in circumstances of failure to act or misfeasance (the performance of a lawful action in an illegal or improper manner)</p>	<p>This is a narrower exclusion.</p> <p>For example, decision-makers:</p> <ul style="list-style-type: none"> <li>• are not liable for negligence</li> <li>• are liable for harm arising from a failure to consider whether retreat is necessary (eg, where information suggested it might be)</li> <li>• are liable for harm arising from an unlawful service withdrawal (misfeasance).</li> </ul>

Buller’s climate and natural hazard risk profile is highly complex and widespread across the district, and significant additional funding will be required to fill the district’s significant hazard modelling and data gaps. Council knows where many of our risks lie across the district. Yet we do not currently have the science to support our assumptions and are therefore unable to consistently apply scientific rigour to the risk prioritisation process.

Council’s increasingly complex responsibilities, post-disaster recovery, and future-focussed district-wide risk assessment and adaptation planning may stretch Council’s resources – particularly when faced with multiple communities and townships concurrently considering retreat. Should a narrower liability exclusion be applied, it is not unreasonable to predict that decision-makers will be unwilling to shoulder an unmanageable burden that exposes them to liability. This could then result in unintended and sub-optimal consequences including failure to decide, or placing too much weight on the desire to avoid litigation.

**Question 30: Which parts of the current (funding) system work well and which do not? Are there any other issues with our current approach to adaptation funding?**

To address all of Buller’s adaptation needs, significant upscaling in available finance would be required.

To date, central government decisions around adaptation funding have been ad hoc and there have been no clear guidelines regarding equitable funding models. To be clear, the more information Council has regarding funding options for our vulnerable and exposed communities, the more enabled it will be to support communities faced with extensive adaptation needs.

We acknowledge that full compensation for all who may be impacted by decisions to retreat in the face of climate change will not be affordable for our small nation. However, it is necessary to consider that failure to deliver policy for managed retreat funding options, now, will inevitably create significant cost and hardship in the future for our most at-risk communities. Providing compensation for retreat is not just an exercise of new spending. We will always be faced with emergencies, and always find money for emergency response and support. Planning funding options for managed retreat now may save significant sums of money in emergency management response, recovery and meeting welfare needs in the future. It may also ultimately save lives.

There is no way to get this right. Communities will always want to be fully compensated for losses incurred in disasters. However, the capacity of local government bodies to deliver on this will vary significantly. We strongly urge central government to address the adaptation and retreat funding policy void so that communities and Councils are empowered to make decisions with all the available information around what central government support is available, rather than assumptions based on prior central government subsidy decisions.

**Question 31: What do you think are the most important outcomes and principles for funding adaptation?**

All outcomes and principles noted in the Issues and Options paper are important, however foremost amongst these include:

- Reducing hardship
- Ensuring equity among communities and across generations
- Shifting focus of investment from post-event to pre-event adaptation
- Prioritizing supporting vulnerable individuals and groups when the government intervenes
- Providing clarity and certainty about how costs, risks and responsibilities will be shared

In addition, Council would also like to prioritise avoiding mental distress and physical health impacts across the community.

**Question 33: In what circumstances should central government help councils to meet adaptation costs?**

Not all communities or individuals will be evenly affected by climate change risk and the need to adapt and retreat. Vulnerability varies based on individual characteristics, community location, and absorptive and supportive capacity across the wider community. Sadly, for Buller, it is mainly our most vulnerable people that reside in homes most at risk from climate hazards, including those within urban Westport, and the northern townships of Granity and Mokihinui, all of which have an extreme socio-economic deprivation index (10 on a scale of 1 to 10). Furthermore, the nearby communities of Hector and Ngakawau also have significant poverty issues, with a deprivation index of 9.

Buller also has a low-density population with only 9,700 residents and around 6,700 general rating units or ratepayers. This limits Council's income streams, and the cumulative effect of extreme weather events on the physical infrastructure and social fabric of the Buller district has led to capacity and cost issues that are insurmountable at a local government level.

Put simply, Buller has no chance of meeting its own climate adaptation funding needs and will require significant additional funding support, above that already committed by central government, to address Westport's future retreat as well as the adaptation needs across the rest of the district.

To illustrate the district's funding gap, an Infometrics Economic Options Analysis<sup>3</sup> calculated that costs to protect Westport and then stage a retreat would equate to around \$600M to 2050. This would

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<sup>3</sup>Real Options Analysis of Strategies to Manage Risks to Westport from Climate Change (Infometrics, 2022).

equate to a burden of over \$89,500 per Buller district ratepayer. Buller's adaptation needs are therefore overwhelming in scale and are one that its community and Council is simply unable to meet.

**Question 35: Are there any other approaches for providing support for people needing to retreat that we should consider?**

Following the Westport flood, government provided funding support to establish a network of 'Navigators' – locals who worked with the flood affected community and provided:

- practical and psychosocial support to enable better access to mental health services, and emergency and recovery response funds,
- advocacy and support regarding accessing temporary accommodation,
- advice regarding working with insurers through the insurance process, and
- advice on assessing property and dwelling damage and securing skilled trades-workers for rebuilding.

Navigators also provided reader / writer support services which proved essential to many parts of the affected community.

Overall, the Navigator programme provided client-based management and support to a total of 215 flood affected clients, and anecdotal reports have indicated that the services it provided were a critical part of disaster recovery during a highly vulnerable period.

Council will continue providing psychosocial support during its climate adaptation engagement with at-risk communities. Links across the NGO sector have now been well established, and Council sees that it has a role to play enabling affected community members to access necessary support services.

**Question 37: What should central government's initial funding priorities be and why? Which priorities are the important and why?**

Council's suggested priorities are:

- Alleviating uncertainty and hardship
- Prioritising primary places of residence
- People who meet certain hardship criteria or means-tested criteria

**Question 42: Are there any other issues that make it difficult to adapt during a recovery?**

For small and isolated Councils like Buller, resources can become stretched beyond manageable levels when faced with cumulative responsibilities of increasing complexity (resulting from aging infrastructure), post-disaster recovery, and future-focussed district-wide risk assessment and adaptation planning.

Many systems and processes have been established with larger and better resourced councils in mind e.g., adaptation planning approaches that requires in-house legal advice, which are just not feasible for a council in Buller's circumstances.

In a post-disaster setting, Council's focus has been on Westport's recovery and future adaptation needs and it has not had the capacity to comprehensively address the needs that exist across the rest of the district. Council does not have the resourcing to fund in-house climate adaptation capability, with its risk assessment and adaptation project being serviced by an external team comprising scientists and engagement experts available for a small handful of hours each week. This team, because it does not sit within Council, is not permitted to join the local government Aotearoa Climate Adaptation Network (ACAN) which provides essential resourcing to local authorities and opportunity to local government climate staff to feed into central government processes.

There are several examples like this where Council has been disadvantaged due to its small size and limited income streams, and it is essential to achieving an equitable adaptation process that these disadvantages are made clear and understood.

### Summary

Council appreciates the opportunity to provide feedback to the Select Committee and looks forward to proactively working with central government to address our district's adaptation and retreat challenges in the future.

Yours sincerely,



.....  
**Steve Gibling**  
CEO  
Buller District Council



.....  
**Jamie Cleine**  
Mayor  
Buller District Council