



29 October 2010

Ref: EN 23-01

Hon Dr Nick Smith
Minister for the Environment and Climate Change Issues
Private Bag 18 888
Parliament Buildings
WELLINGTON 6160

Dear Minister

Re: National policy statement on flood risk– the local government case.

At our meeting in April you requested that we write a succinct and substantive case for a national policy statement on flood risk in order to inform your decision making on whether to progress a with a national policy statement on flood hazard. We have attached a document outlining this case for your consideration.

In brief, local authorities are looking for national leadership on the matter of avoidance of development in flood hazard areas as a matter of precaution. This would mirror the precautionary approach adopted by the Environment Court to coastal hazard.

We believe that communities externalise many of the costs of flood plain development, for example, central government relief after major flood events and increased insurance premiums. We are also seeing this in the follow up to the Canterbury earthquake. A national policy statement is in the national interest, as it will enable communities to adopt a precautionary approach to flood risk management that will benefit local and central government, and New Zealand communities as a whole.

Local authorities are not asking for a number to plan for as in the case of a national environmental standard on sea level rise. This would be inappropriate. Flood hazard will be influenced by a number of factors such as topography, seasonal variation in snow melt, intensity and duration of rainfall events, which in turn influences discharge rates and the carrying capacity of rivers. This suggests to us that flood risk is best addressed at the local level, supported by national government with the provision of national direction.

We would appreciate the opportunity to discuss this matter with you further. We believe we have provided sufficient basis for national direction in addressing flood risk, an issue we see as having a national interest, not just local.

We are also aware that other national policy statements are being considered and would welcome a discussion that clarifies the decision making criteria for national policy statements, in the context of flood risk management, and explores other options for national leadership to support the work of local authorities.

Finally, I would like to reinforce the widespread support for a national policy statement on flood risk. This is not limited to representatives of the local government sector but is also evident in the hazard research community and the Report of the Land and Water Forum: A Fresh Start for Freshwater.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Cairns', written in a cursive style.

Stephen Cairns
Chair of the Regional Affairs Committee RAC Flood Management Sub-committee