

Jeremy Lightfoot
Chief Executive
Ministry for Cities, Environment, Regions, Transport (MCERT)

16 October 2026

Tēnā koe Jeremy

Climate change in Illustrative National Policy Direction related to planning

A well-functioning planning system is an essential part of the transition to a thriving, climate-resilient and low-emissions Aotearoa New Zealand. He Pou a Rangi Climate Change Commission is writing this letter in line with our role to provide independent expert advice on the direction of climate-related policy, with a focus on our experience in assessing climate-related risk and adaptation effectiveness.

The Commission supports an effective, consistent, risk-based approach to assessing and managing natural hazard risk and building resilience. The Commission's recent National Climate Change Risk Assessment shows the importance of ensuring that risk assessment appropriately considers:

1. How risks change over time, factoring in ongoing and future climate change
2. Risks from progressive climate changes, in addition to acute natural hazards.

A proportionate approach to natural hazard risk assessment should consider ongoing and future climate change, not just current climate conditions

The Illustrative Direction includes a directive for land use and natural environment plans to assess natural hazard risk in a way that takes account of long term hazard risk profiles (SW-Directive 2.5), as well as a risk matrix, and associated tables, that would be required to be applied when assessing natural hazard risk (Figure 2).

It is not clear from the Illustrative Direction that ongoing and future climate change will be required to be considered when accounting for long term hazard risk profiles or conducting natural hazard risk assessments. Considering only the current climate would understate both the likelihood and consequence of hazard risk that a subdivision, building or associated infrastructure may face over its life. Natural hazard risk assessments therefore require consideration of the full range of plausible outcomes across future scenarios, rather than relying only on a central or best estimate.

The Commission's recent National Climate Change Risk Assessment shows that the climate contribution to hazards and risk over time is significant. Climate change alters the frequency, intensity, and spatial extent of hazards, with some being permanent.



The following examples illustrate the material scale of change under particular assumptions:

- To illustrate how the frequency/likelihood of hazards could change, 1-in-100-year extreme rainfall in Auckland is expected to occur about every 60 years by mid-century, and every 25 to 50 years by the end of the century. This is within the lifetime of decisions being taken today.
- To illustrate the spatial extent, analysis conducted for the Commission shows about another 600 square kilometres of Aotearoa New Zealand could become exposed to inland flooding with an additional degree of climate warming – that's approximately the size of Auckland City. From a primary production perspective, 35-50% of the country's production land would become markedly drier by 2050. Most of the country will experience about twice as many extreme hot days by 2030 and three times as many by 2050.

These examples should not be treated as single best estimates for planning purposes: local risk assessments need to test the full plausible range of outcomes across relevant scenarios.

A hazard assessed as unlikely under present climate conditions, using the matrix in the illustrative direction, will become more likely within the planning horizon due to climate change. In addition, consequences will increase as hazards compound or occur in quick succession, leaving less time and capacity to recover between events, and bringing increased damage and loss if risks are not proactively reduced. Consideration of future climate conditions will alter the risk rating – potentially being the difference between a 'Medium' and 'High' rating, or 'High' and 'Very High' rating – leading to the need for a different planning response.

The national direction should:

1. *Make clear that decision-makers must consider ongoing and future climate change, over the relevant development and asset lifetimes, , using the full range of plausible modelled climate outcomes across future scenarios, rather than relying only on a central or best estimate.*
2. *Explicitly require hazard risk assessments to use forward-looking, climate-adjusted information for both likelihood and consequence, with assessment periods and scenarios appropriate to the expected life of the development and supporting infrastructure.*

Progressive climate changes pose risks for planning and development, as well as acute natural hazards

The Illustrative Direction focusses on managing acute natural hazards, like flooding, coastal inundation, erosion, landslides and wildfire. However, climate change affects development through both acute natural hazards and progressive climate changes. Progressive changes, like higher average temperatures, sea level rise that will continue for many generations, reduced water availability, and rising groundwater, can also determine whether land remains viable for particular uses. These progressive changes are a certainty, with the only question being around the rate of change.

The suitability of a development depends on whether that development can be serviced reliably and affordably over its lifetime. Development outside of areas deemed to have 'Very High' natural hazard risk may still lock in high future costs – for example, if those areas depend on water supplies that become less reliable or rely on transport, electricity, stormwater or wastewater infrastructure that becomes progressively more expensive to maintain.

In urban areas, sea level rise and rising groundwater can progressively reduce the performance and increase the maintenance costs of transport corridors, stormwater networks, wastewater systems and other critical infrastructure. These impacts can emerge gradually over decades and affect the long-term viability of development even where current acute hazard risks are considered manageable.

In rural areas, changes in pasture productivity, average temperatures, groundwater levels and salinity, rainfall patterns and soil dryness may alter the productive use of land and affect communities that depend on that economic base.

The national direction should require spatial and development planning to consider risks from progressive climate changes alongside acute natural hazard risk.

In summary

To ensure the national policy direction can support appropriate planning now and into the future, the Commission's view is that this must factor in both how future climate change affects risks, as well as the risks from progressive climate change as well as acute natural hazards.

We would be happy to discuss our submission and recommendations with you in further detail.

Ngā mihi nui



Jo Hendy
Chief Executive
He Pou a Rangi Climate Change Commission