To the Planning Team, Rotorua Lakes Council

Name of submitter: Sarah-Jayne McCurrach

Organisation: Natural Hazards Commission Toka Tū Ake

Email: resilience@naturalhazards.govt.nz

Date: 31 October 2025

Thank you for the opportunity to submit further on Plan Change 8 – Natural Hazards (PC8).

The Natural Hazards Commission Toka Tū Ake (NHC) is a Crown Entity responsible for providing residential property owners, with a current contract of fire insurance for their residential property, with insurance against damage from natural hazards covered by the Natural Hazards Insurance Act 2023 (NHI Act).

Our focus is on ensuring long-term resilience by encouraging building in areas that will remain safe and sustainable for future generations. Developing in high-risk natural hazard zones can expose future owners to complex and potentially hazardous situations. It can also compromise the longevity, resilience and safety of these developments.

NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. In alignment with our original submission, we support some submissions on PC8 in this regard, and we have identified some submissions that we oppose.

We endorse submissions that support a risk-based approach to land use planning. However, we are seeking that submissions are disallowed where they are requesting changes to active fault provisions, on the basis of uncertainty. Natural hazard data will always have uncertainties; however, these can be managed using the best available information, and by applying the precautionary principle, particularly where confidence in the active fault information is high.

The precautionary principle states that a lack of full scientific certainty should not be used as a reason to delay measures aimed at reducing risk. Further, the proposed National Policy Statement for Natural Hazards (NPS-NH) includes two policies that support this approach – Policy 5, that local authorities must use best available information; and Policy 6, that local authorities must continue with risk assessment processes where information is uncertain or incomplete. While the NPS-NH is yet to be finalised, it signals a clear policy intent that uncertainty should be managed, rather than not using information because of it.

Active fault mapping conducted in 2025 by GNS Science (now Earth Sciences New Zealand – ESNZ) has informed the provisions in PC8. Their report states that it is suitable to be used at the property level and for planners, policymakers, and landowners to make decisions. ESNZ is a reputable research and science agency and their active fault mapping for Rotorua went through their standard internal peer review process. In our opinion, the assurance within the ESNZ report and their reputation provide a high level of confidence in the information. We are also satisfied that uncertainties are being managed in policies, rules, and guidance by using the best available information and the precautionary principle. We therefore continue to support the inclusion of the active fault provisions.

Our specific comments on these submissions can be found in the attached ‘Further Submission Table’.

We welcome the opportunity to discuss our further submission with council officers if this would be helpful. Please feel free to contact us at any time.

Yours sincerely,

Sarah-Jayne McCurrach

Head of Risk Reduction, NHC

Form 6, Clause 8 of Schedule 1, Resource Management Act 1991

Natural Hazards Commission Toka Tū Ake Further Submission on Plan Change 8 – Natural Hazards

To:	Rotorua Lakes Council
	Via Council submission email: policy.planning@rotorualc.nz
Submitter:	Natural Hazards Commission Toka Tū Ake (NHC)

1. **This is a further submission on the following:**

   The Plan Change 8 – Natural Hazards notified on 25/07/2025.

2. **NHC is an organisation who has an interest in the proposal that is greater than the interest the general public has.**

   As NHC is a 'first loss' insurer for residential damage resulting from natural hazards listed in the NHI Act. this means NHC carries financial risk on behalf of the Crown. Therefore, NHC has a strong interest in reducing risk from, and building resilience to, natural hazards across New Zealand

3. **NHC supports, is neutral, or opposes the submissions of original submitters to the extent outlined in this submission.**

4. **NHC does not wish to be heard in support of this further submission.**

Date:	31/10/2025
Address for service:	Natural Hazards Commission Toka Tū Ake PO Box 790, Wellington 6140
Contact person:	Sarah-Jayne McCurrach, Head of Risk Reduction
Email:	resilience@naturalhazards.govt.nz

Further Submissions Table

Original Submitter	Submission Number	Description	Support/ Oppose	Reasoning	Requested Action
Waikato Regional Council (WRC)	15.2	WRC supports removing hazard mapping from the District Plan as this enables regular updates when new information becomes available. To improve transparency and certainty, the District Plan should clearly state that any primary hazard zones identified through updated mapping will be included or explicitly referenced.	**Oppose**	We oppose removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used.	We seek that this submission be disallowed.
Waikato Regional Council	15.3	WRC commends the inclusion of new definitions and objectives that reflect a more risk-informed and adaptive planning framework. It supports a move towards a threshold-based approach to hazard risk, consistent with the WRPS. WRC recommends replacing the term 'low' with 'minor' [in the definition for acceptable risk] as 'minor risk' better reflects the narrative describing the	**Support**	Effective provisions to reduce risk must have clear terms and definitions to support the consistent application of rules and policies. This submission offers a change that may be useful for supporting the clear interpretation and application of ‘acceptable risk’.	We seek that this submission be allowed.

		consequence of an environmental effect. In contrast 'low risk' could be associated with probability of an occurrence.			
Waikato Regional Council	15.4	WRC supports the proposed definition of Fault Rupture Hazard Areas.	**Support**	The definition for Fault Rupture Hazard Areas will support clear and consistent application of rules and policy. The definition provided is also consistent with guidelines from the Ministry for the Environment (MfE)[1]. [1]MfE, 2003. Planning for Development of Land on or Close to Active Faults. A guideline to assist resource management planners in New Zealand.	We seek that this submission be allowed.
Waikato Regional Council	15.5	WRC supports the proposed definition of overland flowpath.	**Support**	The definition for overland flowpath will support clear and consistent application of rules and policies. Overland flowpaths represent areas of higher flood velocity and depths. A clear definition can support rules and policies targeted towards overland flowpaths, which can support risk reduction.	We seek that this submission be allowed.
Waikato Regional Council	15.6	WRC supports the proposed definition of wildfire.	**Support**	The definition for wildfire will support clear and consistent application of rules and policies. Including a definition for wildfire is important for ensuring that all natural hazards, including emerging hazards, can have provisions to support risk reduction.	We seek that this submission be allowed.
Waikato Regional Council	15.7	WRC supports the amended objective SDNH-O1, stating it aligns with the objective HAZ-O1 in the Waikato Regional Policy Statement.	**Support**	We support including SDNH-O1 in the district plan as it clearly outlines the Council's intention for ensuring risks are acceptable. Indicating when a risk is acceptable can support the consistent application of rules and policies and support risk reduction.	We seek that this submission be allowed.

Waikato Regional Council	15.8	WRC supports the emphasis on resilience in SDNH-O2 but recommend that the objective also reference an adaptive approach, which enables flexible and responsive planning to address evolving climate conditions and emerging risks. This approach is aligned with local government authorities' requirement to 'have regard' to the National Adaptation Plan when preparing plans under the RMA.	**Support**	Expanding SDNH-O2 to include a reference to adaptive approaches is a useful way to manage many changes associated with climate change and emerging risks. Adaptive approaches are also useful for managing uncertainties in natural hazard data and information (including future climate change scenarios). It is also important that objectives are consistent with other planning and policy instruments including the National Adaptation Plan.	We seek that this submission be allowed.
Waikato Regional Council	15.9	WRC supports the intent of SDNH-P1 to promote risk informed planning using the best available information. However, the revised policy omits any reference to adapting to changing risk. WRC recommends reinstating and strengthening references to adaptation planning, particularly in relation to changing climate risk. To achieve this, we [WRC] suggest: a) adding a clause that supports short-, medium- and long-term adaptation planning approaches for managing changing climate risk; b) clarifying the scope of "national and regional guidance" to confirm whether it includes non-statutory sources, such as the forthcoming WRC Climate Change Adaptation Guidelines; and c) strengthening Clause 3 by replacing "take into account" with a requirement to assess climate change impacts ensuring a more robust and accountable planning process.	**Support**	The proposed changes from Waikato Regional Council will strengthen SDNH-P1 to ensure that climate change is being considered in a way that can lead to positive actions that can reduce impacts to people and property.	We seek that this submission be allowed.

		WRC considers these changes would better align with the National Adaptation Plan and WRPS policy HAZ-M3, while reflecting best practice in climate risk management. They would also treat adaptation as a proactive and structured process, rather than a passive consideration.			
Waikato Regional Council	15.10	WRC recommends amending NH-PA to require risk assessments for all new developments regardless of flood depth, to ensure alignment with the WRPS. An amendment will also enable consistency with emerging national direction. While not yet adopted, the National Policy Statement for Natural Hazards (NPS-NH) signals requirement for risk assessments for all consents.	**Support**	Requiring risk assessment for all new developments is an effective way to ensure that only areas with an acceptable level of risk can be developed. The current method of only completing a risk assessment when flood depths reach a certain threshold could oversimplify flood hazard. Flood velocity is an important parameter that can influence impacts to people and property[1]. Therefore, conducting a risk assessment regardless of flood depth is an approach that can support reducing impacts to people and property. We also support ensuring that all provisions are in alignment with other planning and policy documents including the proposed National Policy Statement for Natural Hazards (NPS-NH) and Waikato Regional Policy Statement. [1]Australian Institute for Disaster Resilience, 2014. Australian Disaster Resilience Guideline 7-3: Technical flood risk management guideline: Flood hazard.	We seek that the submission be allowed.
Waikato Regional Council	15.12	WRC recommends amending Rule NH-R5 and relevant strategic policies to incorporate both flood depth and velocity in the classification of high flood hazard zones. Using only depth-based thresholds oversimplifies flood risk and underestimates danger in areas with fast-moving	**Support**	Flood depth and velocity are the key factors that influence flood vulnerability and subsequent impacts to people and property[1]. Therefore, it is important that both factors are considered as part of NH-R5 to contribute to reducing impacts to people and property.	We seek that this submission be allowed.

		water. Velocity is a critical factor influencing risk to life, property and infrastructure.		[1]Australian Institute for Disaster Resilience, 2014. Australian Disaster Resilience Guideline 7-3: Technical flood risk management guideline: Flood hazard.	
Red Stage Investments	20.1	Red Stag Investments support the proposed strategic direction of PC8, which seeks to embed a risk-based approach to the management of natural hazards. The proposed objective SDNH-O1, "The risks from natural hazards to people, property and the environment associated with land use, subdivision and development are acceptable," moves the plan towards a framework that aligns with national guidance. This approach correctly focuses on the level of risk rather than merely the presence of a hazard.	**Support**	We support a risk-based approach that requires risks to be at an acceptable level. An acceptable level of risk can support reducing the impacts to people and property in future natural hazard events.	We seek that this submission be allowed.
Red Stag Investments	20.2	Red Stag Investments supports the principle of using the "best available information," as promoted in the proposed policy SDNH-P1. This principle is fundamental to sound resource management.	**Support**	Using the principle of 'best available information' is a useful way to manage uncertainties associated with natural hazard data and information. Uncertainties within natural hazard data are common but should not be used to prevent or delay decision-making. A provision to use 'best available information' encourages decision-making and action to reduce impacts to people and property even when there may be limits to the information available. Further, the use of 'best available information' also aligns to the proposed NPS-NH.	We seek that this submission be allowed.
Red Stag Investments	20.3	Red Stag Investments supports the Council's [RLDC] proposal to remove outdated and static fault maps from the District Plan's planning maps and instead refer to an external, live database—the New Zealand Active Faults Database (NZAFD). [Red Stag Investments believe] this is a	**Oppose in part**	We oppose removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be	We seek that this submission be disallowed, or clear processes and provisions are developed to

		pragmatic and efficient mechanism that prevents the District Plan from becoming quickly obsolete as scientific knowledge, data resolution, and mapping techniques evolve. The GNS Science report itself, which supersedes the previous 2010 mapping, is a clear example of how rapidly this information can change. This approach allows for greater flexibility and ensures that decision-making is based on the most current scientific understanding. However, this reliance on an external database makes it critically important that the provisions of the District Plan are sufficiently nuanced to handle instances where the data within that database is acknowledged to be of low confidence or high uncertainty. The plan must contain mechanisms to address such situations fairly and efficiently, a matter which is at the core of this submission.		heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used. We agree that if natural hazard maps are removed from the District Plan there must be robust processes and provisions in place to ensure the hazard maps can still restrict development when required (using a risk-based approach).	facilitate the effective use of hazard maps, if they are to be removed.
Red Stag Investments	20.4	Red Stag Investments opposes the application of the proposed 'Fault Rupture Hazard Areas' to its property at the entrance of the Waipa Valley on the following grounds: • This fault trace affecting the land is officially classified by GNS as having "uncertain" location [in the NZ Active Faults Database] and the methodology used to identify it a desktop assessment using LiDAR—is acknowledged by GNS itself to have significant limitations in environments like the Submitter's site, which is a former	**Oppose**	We oppose changes to Fault Rupture Hazard Areas. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science[1] in line with guidelines from MfE[2]. We have a high level of confidence in the report as it was completed by a reputable research institute and has been internally peer reviewed. While we acknowledge that there is uncertainty associated with mapping active faults, this should not be used as a reason to change the provisions for Fault Rupture Hazard Areas. The report[1] also specifically states that the	We seek that this submission be disallowed.

		wetland with deep, unconsolidated deposits that conceal any geological features. There is no surface evidence of a fault on the property. ... • The plan proposes to apply a set of certain rules, processes, and costs to mitigate a risk that is based on uncertain information. This approach fails to adequately address the RMA's requirement for a careful evaluation of the appropriateness of provisions where there is uncertain or insufficient information. ...		mapping is appropriate for a range of uses including *"cadastral scales relevant for planners, policymakers and landowners to make decisions about land use..."* (p.6). Active faults have the potential to greatly impact people and property. The effects from fault rupture include significant ground movement (often >5m of horizontal movement[2]), which would destroy buildings and infrastructure. The provisions for Fault Rupture Hazard Areas in PC8 effectively manage uncertainties in the data and will contribute to reducing impacts to people and property. [1]Morgenstern, R. & Villamor, P., 2025. Active fault mapping and Fault Avoidance Zones for Rotorua Lakes District: An update. GNS Science. [2]MfE, 2003. Planning for Development of Land on or Close to Active Faults. A guideline to assist resource management planners in New Zealand.	
Lake Ōkāreka Community Association	21.1	The submitter supports a risk-based approach focused on acceptable risk and resilience.	**Support**	We support a risk-based approach that requires risks to be at an acceptable level. An acceptable level of risk can support reducing the impacts to people and property in future natural hazard events.	We seek that this submission be allowed.
Lake Ōkāreka Community Association (LOCA)	21.3	LOCA strongly supports the principle of removing static hazard maps from the District Plan to allow for the use of best and most up-to-date information, but considers that the proposal for Fault Rupture contradicts this by relying on uncertain data while ignoring more relevant and	**Oppose**	We oppose changes to fault rupture provisions. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science[1] in line with guidelines from MfE[2]. We have a high level of confidence in the report as it was completed by a reputable research institute	We seek that this submission be disallowed.

		current information. It explains PC8 is proposing to define a "Fault Rupture Hazard Areas" based on the 2025 GNS Science update of the NZ Active Faults Database. A more detailed, site-specific assessment (the Berryman Report) highlights a profound level of uncertainty concluding it is not possible to refine the FAZ at this locality due to historic landscape modification from residential development.		and has been internally peer reviewed. While we acknowledge that there is uncertainty associated with mapping active faults, this should not be used as a reason to change the definition or provisions for Fault Rupture Hazard Areas. Active faults have the potential to greatly impact people and property. The effects from fault rupture include significant ground movement (often >5m of horizontal movement[2]), which would destroy buildings and infrastructure. The definition and provisions for Fault Rupture Hazard Areas in PC8 effectively manage uncertainties in the data and will contribute to reducing impacts to people and property. We oppose removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and	

				developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used. [1]Morgenstern, R. & Villamor, P., 2025. Active fault mapping and Fault Avoidance Zones for Rotorua Lakes District: An update. GNS Science. [2]MfE, 2003. Planning for Development of Land on or Close to Active Faults. A guideline to assist resource management planners in New Zealand.	
Lake Ōkāreka Community Association (LOCA)	21.4	LOCA considers it inequitable to impose definitive rules based on uncertain evidence. It does not dispute the location of a fault [with respect to the fault identified over Acacia and Pryce Roads] but states that the fault location and recurrence interval are not confidently established. Landowners are penalised due to a lack of definitive data, not because of a proven, quantified high risk. It considers that the onus is on Council to provide definitive evidence, not the community. LOCA submit that the Fault Rupture Hazard Areas and Rules NH-R1 to NH-R3 are not applied to the newly identified fault at Lake Ōkāreka at this time; and that the area is identified instead as an "Area of Geological Investigation" to allow for a Council-led investigation before any rules are applied. and that the Fault Rupture Hazard Area only be applied if warranted by conclusive scientific findings.	**Oppose**	We oppose changes to fault rupture provisions. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science[1] in line with guidelines from MfE[2]. We have a high level of confidence in the report as it was completed by a reputable research institute and has been internally peer reviewed. While we acknowledge that there is uncertainty associated with mapping active faults, this should not be used as a reason to change the definition or provisions for Fault Rupture Hazard Areas. Active faults have the potential to greatly impact people and property. The effects from fault rupture include significant ground movement (often >5m of horizontal movement[2]), which would destroy buildings and infrastructure. The definition and provisions for Fault Rupture Hazard Areas in PC8 effectively manage uncertainties in the	We seek that this submission be disallowed.

				data and will contribute to reducing impacts to people and property. [1]Morgenstern, R. & Villamor, P., 2025. Active fault mapping and Fault Avoidance Zones for Rotorua Lakes District: An update. GNS Science. [2]MfE, 2003. Planning for Development of Land on or Close to Active Faults. A guideline to assist resource management planners in New Zealand.	
Lake Ōkāreka Community Association (LOCA)	21.5	LOCA opposes the adoption of flood levels for Lake Ōkāreka from the 2022 BOPRC Rotorua Lakes Design Levels Technical Report as it considers the methodology is technically invalid. It uses a Gumbel statistical analysis based on historical data from before the 2021 outlet upgrade and ignores the new infrastructure's physical capacity. It also fails to incorporate climate change effects, such as increased rainfall intensity. LOCA also notes that any flooding assessment should not be artificially constrained by a discharge of 500L/s because this would fail to account for the reality of how a system would be operated during an extreme flood event - the pipeline has an emergency capacity to pass flows of up to 800L/s and it would be artificial to assume that operators would be constrained by the 500L/s limit. LOCA considers freeboard should only be applied to a robustly calculated flood level and applying it to a flawed level is a meaningless exercise.	**Oppose**	We oppose changes to flood provisions. The flood modelling used to inform flood provisions within PC8 (outlined in the section 32 report) is considered the best available information. Much of the flood modelling has been recently completed by Bay of Plenty Regional Council, accounts for potential changes due to climate change, and considers 1% AEP events, which is becoming standard practice across the country. In our opinion the Rotorua Lakes Design Levels Technical Report 2022[1] is a high-quality report as it has been completed by Bay of Plenty Regional Council and follows established scientific methods[2]. The submitters oppose using data prior to 2021, however, using historical records is a standard method for calculating AEP[2]. The report explicitly states that climate change modelling has been commissioned as part of separate work, and it is clear from the section 32 report that considerations for climate change have been made.	We seek that this submission be disallowed.

				While there are still uncertainties associated with the information (including recent upgrades to the lake outlet systems), the information used can still be classified as 'best available information'. The use of 'best available information' aligns to SDNH-P1 in PC8 and encourages decision-making and action to reduce impacts to people and property even when there may be limits to the information available. Further, the use of 'best available information' aligns to the proposed NPS-NH. [1]Bay of Plenty Regional Council, 2022. Rotorua Lakes Design Levels Technical Report. [2]Australian Institute for Disaster Resilience, 2017. Australian Disaster Resilience Handbook 7 Managing the Floodplain: A Guide to Best Practice in Flood Risk Management in Australia	
Lake Ōkāreka Community Association (LOCA)	21.6	LOCA generally supports the direction of the proposed wildfire provision but seeks clarification that requirements for onsite water storage for firefighting are practical, cost-effective and avoid adverse effects on the lakeshore environment.	**Oppose**	The section 32 report for PC8 outlines the requirements for firefighting and the consequences if the policies are not implemented. These requirements highlight the need for wildfire provisions to be included in the District Plan. Having water for firefighting available onsite can reduce damage to people and property and avoid severe damage to vegetation in event of a wildfire.	We seek that this submission be disallowed.
Lake Ōkāreka Community Association (LOCA)	21.7	LOCA supports the land stability provisions. It supports the removal of static maps and a consistent approach to site specific assessment, aligning with the principle of using best available information.	**Oppose in part**	We support the land stability provisions and aligning to the principle of best available information. However, we oppose removing natural hazard mapping from the District Plan due to	We seek that the part of this submission supporting the removal of static

				concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used.	maps be disallowed.
Summerset Holdings Group Limited	26.1	The National Policy Statement for Natural Hazards (NPS-NH) is expected to introduce a nationally consistent framework for assessing and managing natural hazard risks, including flooding. Proceeding with PC8 ahead of the NPS-NH risks introducing provisions that may soon be inconsistent with national direction, creating uncertainty for future resource consents and requiring a further plan change to align with the NPS-NH. PC8 be put on hold pending the adoption of the National Policy Statement for Natural Hazards.	**Oppose**	While the proposed NPS-NH creates uncertainty for local authorities, its status should not be used as a reason to delay the plan change. The section 32 report outlines that the policy direction for the NPS-NH is well-aligned to the strategic objectives and policies for PC8. Further, plan changes associated with natural hazards are excluded from the existing ban on plan changes, which recognises the importance of implementing rules and policies that can reduce the impacts from natural hazards to people and property.	We seek that this submission be disallowed.

Summerset Holdings Group Limited	26.2	Summerset supports the intent of NATC-R3 to manage natural hazards and risks. However, they are concerned that the current wording may not adequately account for site-specific constraints and the practical limitations of full avoidance. We [Summerset Holdings Group Limited] request that the rule be amended to allow for a balanced assessment of mitigation measures, recognizing that some residual risk may remain despite best-practice design and engineering. We are also concerned about the proposed inclusion of a new matter of discretion under rule NATC-R3, which relates to "the extent to which natural hazard risks are avoided or remedied, and the worsening of any hazard." Given the site constraints, it may not be possible to fully avoid or mitigate natural hazards, and retaining this matter of discretion could present challenges in obtaining future consents.	**Oppose**	It is important that residual risk is assessed for whether it is acceptable, including any proposed management options. Residual risk is the risk that remains after risk treatment options have been applied. In many cases, despite best practice mitigation measures, the level of residual risk can remain at an unacceptable level. In these cases, development should be avoided to reduce the impact to people and property. Further, the extent to which natural hazard risks are avoided or remedied is an important consideration. This can support ensuring that natural hazard risk is at an acceptable level and reduces impacts to people and property.	We seek that this submission be disallowed.
Rotorua Lakes Council (RLC)	29.1, 29.2, 29.3, 29.4	RLC notes that changes to the Building Act and a new National Environmental Standard have been proposed to enable minor residential units to be constructed without building consent or resource consent, but that the detail of these changes has yet to be confirmed. It considers that there may still be issues to address through the District Plan to ensure that management of natural hazards can continue and is integrated notwithstanding these changes.	**Support**	We support that the rules in PC8 are updated to ensure that they can deliver the best possible outcomes for reducing natural hazard risk to people and property. This is especially the case for a dynamic policy environment where there are new policies that will make additional residential units easier to build.	We seek that this submission be allowed.
Rotorua Lakes Council	29.5	In anticipation of these changes, PC8 proposes a restricted discretionary activity status for new residential units and building additions in geothermal systems where no building consent is sought. This recognised that current	**Support**	We support a restricted discretionary activity status for new residential units and building in geothermal systems. Geothermal activity has the potential to cause negative impacts to people and property. The Natural Hazards	We seek that this submission be allowed.

		management of geothermal hazards in the Rotorua District relies primarily on the building consent process and the performance standard to submit an assessment of geothermal hazards at the time of application for building consent. However, geothermal hazards are not defined as a 'natural hazard' under the Building Act so these processes to manage this natural hazard through the building consent process may no longer be available. With increased certainty about the upcoming changes, there may be opportunities to improve efficiency and more closely align the approach to minor residential units that do not require building consent with the approach to other buildings.		Portal[1] shows several settled EQCover claims (~20) for hydrothermal activity (a type of geothermal activity). Therefore, managing new residential units through land use planning can be an effective way to contribute to reducing the impacts to people and property, especially in the context of new legislation (e.g. small standalone dwellings/granny flats). [1] Natural Hazards Commission. Natural Hazards Portal. Accessed 28 Oct 2025	
Lake Tarawera Ratepayers Association	30.2	The association requests that the Tarawera Catchment is included in any further research proposals regarding fault lines to narrow and refine proposed restrictions but also noted that there had been some refinement already.	**Support**	Natural hazard data and information will always have an element of uncertainty. It is important that all areas in the Rotorua Lakes District are investigated for active faults and provisions are updated as new information is available.	We seek that this submission be allowed.
Lake Tarawera Ratepayers Association	30.3	The association requests that RLC engage directly with BoPRC to update Hydrology Assumptions which appear to be based around historic (higher) lake levels and do not account for the long term decline in lake levels [at Lake Tarawera]. They think this will reduce some barriers for proposed Papakainga housing.	**Support in part**	We support further flood modelling to understand how the lowering of lake levels over time[1] could impact future flood hazard (and reduce existing uncertainties in the 2022 report). However, we oppose any further investigations being used to justify removing flood provisions from PC8. The flood modelling used to inform flood provisions within PC8 (outlined in the section 32 report) is considered best available information. The Rotorua Lakes Design Levels Technical Report 2022[1] acknowledges the lowering of lake levels	We seek that this submission be allowed, provided the current modelling is not removed from PC8.

				at Lake Tarawera but provides no explanation. We acknowledge that this can create uncertainties, however, the information should still be used to set flood provisions within PC8 to reduce the impacts to people and property. This use of best available information is in line with the proposed NPS-NH. [1]Bay of Plenty Regional Council, 2022. Rotorua Lakes Design Levels Technical Report.	
Rotorua Planning Consultants Group	39.2	The submitters oppose the removal of natural hazard maps for the following reasons: • It will not provide for clear and consistent implementation and lacks certainty for homeowners, insurance companies and developers • Process - the maps form part of a plan rule and the maps should go through a robust process and made available to the general public for submissions • They state that no research was completed justifying the removal of the planning maps and how efficient and effective the plan will be or that external material referenced by the plan is the best material for its purpose. • They state that they undertook a brief review of other plans within NZ and did not identify this approach being used by other authorities. • They consider requirements relating to incorporation by reference have not been followed (cl34(2)(c) - public notice of the availability of externally referenced material before notification.	**Support**	We support Natural Hazard Overlays remaining within the District Plan. The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. We agree that the removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies and creates uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used.	We seek that this submission be allowed.

Rotorua Planning Consultants Group	39.3	The submitters consider that wildfire is not relevant to Rotorua at the district level and if it is deemed to be an issue it is more appropriately addressed at a regional scale. The proposed rule framework does not specifically address the hazard of 'wildfire' but rather focuses on improving access to water for the purposes of structural firefighting. The submitters also question whether the requirement for servicing in RURZ-S5A implies that Council infrastructure is no longer sufficient. They question the meaning of 'densely populated areas' in the context of SUB-P16 and ask whether urban areas are now required to install water tanks. They consider that rules are being introduced for a hazard that has not previously posed a significant issue and may not be relevant.	**Oppose**	While we acknowledge that there have been no previous wildfire events in Rotorua Lakes District, it doesn't mean that it won't become an issue in the future. Climate change is exacerbating and changing a range of natural hazards including wildfire. The proposed provisions for managing wildfire will support reducing the impacts to people and property in the future, as wildfire risk increases for Rotorua Lakes District.	We seek that this submission be disallowed.
Rotorua Planning Consultants Group	39.4	The submitters state there are significant concerns with the Lake Okareka flood modelling intended to support PC8 – the modelling uses historical lake level data and does not reflect substantial improvements to the outlet system. They state 'a specific concern relates to the flood prone contour adopted of 355.90m (Moturiki Datum), which is considerably higher than the 1%AEP (100-year ARI) peak lake level of 354.45m. They state that if adopted in its current form it could affect the ability to obtain building consents and have long-term implications for insurance and property values. The submitters also state that once embedded into an operative plan there is very limited ability to update or correct the model or associated	**Support in part**	We support further flood modelling to reflect improvements to the outlet system (and reduce existing uncertainties in the 2022 report). However, we oppose any further investigations being used to justify removing flood provisions from PC8. The flood modelling used to inform flood provisions within PC8 (outlined in the section 32 report) is considered the best available information. Much of the flood modelling has been recently completed by Bay of Plenty Regional Council, accounts for potential changes due to climate change, and considers 1% AEP events, which is becoming standard practice across the country.	We seek that this submission be allowed, provided existing flood provisions are not removed from PC8.

		maps without initiating a formal plan change process.		The Rotorua Lakes Design Levels Technical Report 2022[1] is also a high-quality report as it has been completed by Bay of Plenty Regional Council and follows established scientific methods[2]. The submitters oppose using data prior to 2021, however, using historical records is a standard method for calculating AEP[2]. While there are still uncertainties associated with the information (including recent upgrades to the lake outlet systems), the information used can still be classified as 'best available information'. The use of 'best available information' aligns to SDNH-P1 in PC8 and encourages decision-making and action to reduce impacts to people and property even when there may be limits to the information available. Further, the use of 'best available information' aligns to the proposed NPS-NH. [1]Bay of Plenty Regional Council, 2022. Rotorua Lakes Design Levels Technical Report. [2]Australian Institute for Disaster Resilience, 2017. Australian Disaster Resilience Handbook 7 Managing the Floodplain: A Guide to Best Practice in Flood Risk Management in Australia	
Rotorua Planning Consultants Group	39.5	The submitters consider that a performance standard should be 'black and white' and that NH-R5 is open to interpretation. They also question its application to more intensely developed zones, stating that given that the commercial and city centre are connected to the public stormwater reticulated system, there may	**Oppose**	Overland flowpaths are areas where flood waters will preferentially flow in flood events when existing stormwater provisions are overwhelmed. They often have higher velocities and depths, making them higher risk areas. Stormwater systems are important for managing flood hazard, however, there	We seek that this submission be disallowed.

		not be a high risk associated with overland flowpath in these areas. They also ask if site coverage provisions have been altered to reflect this hazard. They disagree with the section 32 report that overland flowpaths can be determined by topography.		remains residual risk if the stormwater system were overwhelmed or broken during a flood event. Further, as climate change is likely to increase the frequency and intensity of rainfall events[1], residual risk from stormwater systems is likely to increase. The provisions in NH-R5 are important to reduce the impacts to people and property in flood events. [1]Bay of Plenty Regional Council (n.d.). Our future climate.	
Rotorua Planning Consultants Group	39.10	The submitters support the removal of hazard mapping from the district plan, which they describe as often out of date or inaccurate, alongside removal of the land use rules.	**Oppose**	We oppose removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used.	We seek that this submission be disallowed.

Rotorua Planning Consultants Group	39.11	Fault hazard management is amended to refer to the subdivision process only and not buildings otherwise permitted. Simple assessment criteria are included in the Plan to reinforce the need to consider fault risks/effects.	**Oppose**	We oppose changes to fault rupture provisions. Active faults have the potential to greatly impact people and property. The effects from fault rupture include significant ground movement (often >5m of horizontal movement[1]), which would destroy buildings and infrastructure. Therefore, provisions for fault rupture should not just be included for subdivision, but a range of different buildings. [1]MfE, 2003. Planning for Development of Land on or Close to Active Faults. A guideline to assist resource management planners in New Zealand.	We seek that this submission be disallowed.
Newvid Holdings Trust (NHT)	40.1	NHT supports flood mapping sitting outside the District Plan but would seek more clarity and articulation on how as new information that comes into Council's hands is shared to the public.	**Oppose in part**	We oppose removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any	We seek that this submission be disallowed, or clear processes and provisions are developed to facilitate risk-based planning if hazard maps are removed.

				updates will require a consultation process, which supports robust information being used. We agree that if natural hazard maps are removed from the District Plan there must be robust processes and provisions in place to ensure planning can still restrict development when required (using a risk-based approach).	
Newvid Holdings Trust (NHT)	40.2	NHT opposes the use of the flood modelling information produced by BOPRC in which Council is using to determine the minimum floor levels for a 1%AEP flood event with an allowance for climate change in respect to Lake Ōkāreka because the modelling was based on information prior to the 2021 upgrades of the Lake pumpstation which has significant impacts on managing lake levels during extreme weather events.	**Oppose**	We oppose flood hazard modeling being removed from PC8. The flood modelling used to inform flood provisions within PC8 (outlined in the section 32 report) is considered the best available information. Much of the flood modelling has been recently completed by Bay of Plenty Regional Council, accounts for potential changes due to climate change, and considers 1% AEP events, which is becoming standard practice across the country. The Rotorua Lakes Design Levels Technical Report 2022[1] is also a high-quality report as it has been completed by Bay of Plenty Regional Council and follows established scientific methods[2]. The submitters oppose using data prior to 2021, however, using historical records is a standard method for calculating AEP[2]. While there are still uncertainties associated with the information (including recent upgrades to the lake outlet systems), the information used can still be classified as 'best available information'. The use of 'best available information' aligns to SDNH-P1 in PC8 and encourages decision-making and action to reduce impacts to people and property even when there may be limits to the information available. Further, the use of 'best	We seek that this submission be disallowed.

				available information' aligns to the proposed NPS-NH. [1]Bay of Plenty Regional Council, 2022. Rotorua Lakes Design Levels Technical Report. [2]Australian Institute for Disaster Resilience, 2017. Australian Disaster Resilience Handbook 7 Managing the Floodplain: A Guide to Best Practice in Flood Risk Management in Australia	
Newvid Holdings Trust	40.3	The reference to 'declining consent' if flood risks are shown not to be acceptable is problematic as 'acceptable risk' is vague and subjective.	**Oppose**	As part of PC8 Rotorua Lakes District has provided a clear definition for acceptable risk, which provides clarity for what circumstances could result in a consent being declined. Declining consents where risk is not acceptable will support reducing impacts to people and property.	We seek that this submission be disallowed.
Newvid Holdings Trust (NHT)	40.4	NHT opposes the definition of acceptable risk because it is unclear and not quantifiable.	**Oppose**	Including a definition for 'acceptable risk' provides consistency for the application of rules and policies. It also supports a risk-based approach that can reduce the impacts to people and property.	We seek that this submission be disallowed.
Newvid Holdings Trust (NHT)	40.5	NHT supports fault lines and fault avoidance zones mapping sitting out the District Plan but opposes the use of GNS data and information on fault lines and fault avoidance zones that run through urban areas until further investigation has been completed to accurately determine the fault lines transgression. It notes that LiDAR has been used to map the faults and that this has limitations due to interference from buildings and infrastructure, which obscure ground features and create	**Oppose**	We oppose changes to fault rupture provisions. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science[1] in line with guidelines from MfE[2]. We have a high level of confidence in the report as it was completed by a reputable research institute and has been internally peer reviewed. While we acknowledge that there is uncertainty associated with mapping active faults, this should not be used as a reason to change the definition or provisions for Fault Rupture Hazard Areas. The report[1] also specifically	We seek that this submission be disallowed.

		shadow zones. The technology cannot penetrate the ground, restricting fault detection to surface expressions only. Anthropogenic features can also mimic or mask fault-related geomorphology, increasing the risk of misinterpretation. Therefore, GNS fault mapping within urban areas should not be used to guide planning provisions and further investigation and testing should be done to map an accurate fault line.		states that the mapping is appropriate for a range of uses including "cadastral scales relevant for planners, policymakers and landowners to make decisions about land use..." (p.6). Active faults have the potential to greatly impact people and property. The effects from fault rupture include significant ground movement (often >5m of horizontal movement[2]), which would destroy buildings and infrastructure. The mapping and subsequent provisions for Fault Rupture Hazard Areas in PC8 effectively manage uncertainties in the data and will contribute to reducing impacts to people and property. We also oppose removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard	

				information within the plan means that any updates will require a consultation process, which supports robust information being used. [1]Morgenstern, R. & Villamor, P., 2025. Active fault mapping and Fault Avoidance Zones for Rotorua Lakes District: An update. GNS Science. [2]MfE, 2003. Planning for Development of Land on or Close to Active Faults. A guideline to assist resource management planners in New Zealand.	
Kāinga Ora Homes and Communities (Kāinga Ora)	42.1	Incorporate the risk hierarchy approach and definitions from the consultation version of the National Policy Statement for Natural Hazards Decision Making (NPS-NHD). This includes adoption of definitions of high, moderate and low risk from this document (and consequential amendment required to give effect to the changes sought and this submission).	**Support in part**	We acknowledge that a risk hierarchy approach is a useful way to manage and reduce natural hazard risk. However, the approach that has been adopted by Rotorua Lakes Council will also support natural hazard risk reduction and reducing the impacts to people and property. Therefore, we support changing to a risk hierarchy approach as long as the corresponding provisions still apply a risk-based approach and support reducing impacts to people and property.	We seek that this submission be allowed, provided the provisions in PC8 still support natural hazard risk reduction.
Kāinga Ora	42.2	Kāinga Ora supports the removal of all hazards maps from the District Plan and displaying the hazard mapping as a nonstatutory layer on the Council's Geyserview maps. The interactive maps, as a non-statutory layer, that sits outside of the District Plan, provides for better management of land use in relation to hazards, as hazards are dynamic and change over time. This is reflected in the potential for the spatial extent of hazards to change from (a) mitigation of hazards, such as large-scale infrastructure	**Oppose**	We oppose removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the	We seek that this submission be disallowed.

		improvements, (b) climate change and natural hazard events, which can change the location, extent and effects of hazards on land, and (c) the quality of information available at any given time.		maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used.	
Kāinga Ora	42.3	Kāinga Ora considers that the definition [for acceptable risk] includes the requirement of an assessment and is subjective. Further, Kāinga Ora seeks that the definition is deleted and replaced with definitions for low, medium and high risk which includes links to 'tolerable', 'moderate' and 'intolerable' associated to those risks. Kāinga Ora generally support the inclusion of a term and definition that indicate whether a hazard is deemed high risk. Kāinga Ora supports the use of a term that indicates risks that would require an urgent response or have development avoided entirely.	**Support**	We support clear provisions that can reduce natural hazard risk. Providing clear terms and definitions and corresponding provisions for high, medium, and low risk can be a useful way to ensure the clear application of rules and policies and support risk reduction.	We seek that this submission be allowed.
Kāinga Ora	42.7	Kāinga Ora supports the proposed amendments to SDNH-O1 insofar as updating the test to acknowledge and respond to the proposed National Policy Statement. Kāinga Ora considers that the term 'acceptable' is open to interpretation and prefers a tiered management approach relevant to the degree of risk.	**Oppose**	Rotorua Lakes District Council has provided a definition for 'acceptable risk' that can be used to provide clarity and consistency when applying rules and policies. Defining acceptable risk supports a risk-based approach and can reduce the impacts to people and property.	We seek that this submission be disallowed.

Kāinga Ora	42.10	Kāinga Ora supports the proposed amendments to Policy SDNH-P2 pertaining to 'Strengthen, maintain and protect natural systems and features to recognise the requirements of the proposed [National Policy Statement for Natural Hazards].	**Support**	We support strengthening natural systems as they can be used for minimising the impacts from natural hazards (such as flooding) and protect people and property.	We seek that this submission be allowed.
Fonterra Limited	43.1	Retain Flooding Maps and Overland Flowpath Maps within the District Plan to ensure that the maps (and any future updates) are required to go through a Schedule 1 RMA process. Alternatively introduce a clear, flexible, user friendly pathway where property owners can apply to RLC to request a review of Flooding or Overland Flowpath hazard data for a specific property (to consider site specific features or characteristics that may not be captured, provided for or considered in the respective modelling).	**Support**	We support Natural Hazard Overlays remaining within the District Plan. The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used. We agree that if natural hazard maps are removed from the District Plan there must be robust processes and provisions in place to ensure planning can still restrict development when required (using a risk-based approach).	We seek that this submission be allowed.

Bay of Plenty Regional Council	45.3	BOPRC supports the removal of the specified hazard mapping from the Rotorua District Plan to enable the best information to be used to support decision making as and when it becomes available. This approach is consistent with Regional Policy Statement Method 23A (review hazard and risk information), which requires Councils to review and update hazard and risk information held by local authorities whenever relevant research is released and, in any case, at the time of plan review or relevant plan change.	**Oppose**	We oppose removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used.	We seek that this submission be disallowed.
Bay of Plenty Regional Council	45.4	While BOPRC supports defining acceptable risk it seeks that it is amended to more clearly give effect to Bay of Plenty Regional Policy Statement Policy NH 4B by referring to no increase in risk offsite. It further states that the words 'the costs of further reducing risks are largely disproportionate to the benefits gained' introduces a cost benefit approach that could be difficult to implement without guidance. Therefore, it seeks that this part is removed from the definition. However, if pursued, it seeks that guidance or references within rules are developed to give clarity for implementation.	**Support**	We support defining ‘acceptable risk’ to support a risk-based approach and the reduction of impacts to people and property. This submission provides some useful suggestions for improving the way that acceptable risk is used by Rotorua Lakes District Council and will support the consistent application of rules and policies between Rotorua Lakes District and Bay of Plenty.	We seek that this submission be allowed.

		BOPRC also notes that acceptable risk is only used in the interpretation section but that similar terms are used elsewhere: 'acceptable' and 'acceptable level of risk'. BOPRC refers to the national planning standards and states that if a term is defined it should be used and not replaced by synonyms or similar terms.			
Bay of Plenty Regional Council	45.5	To avoid confusion for plan users, the definition of Fault Rupture Hazard should include clarification that it is the same area as the Fault Avoidance Zones (and potentially Fault Awareness Areas) when referring to the New Zealand Active Faults Database. BOPRC also notes that the section 32 report proposed wording similar to their proposed changes but that this part of the definition was not carried over to the annotated text consistent with the section 32 report.	**Support**	The consistent application of rules and policies requires clear terms and definitions. This submission provides useful advice that can improve how Fault Rupture Hazard is defined and explained, which can support the consistent application of rules and policies.	We seek that this submission be allowed.
Bay of Plenty Regional Council	45.6	BOPRC supports defining 'overland flowpath' in both the main part of the District Plan and Lakes A Zone definitions, particularly in the absence of mapping. The definition includes new wording limiting overland flowpaths in rules and performance standards to 4,000m2 or more, however does not define 'major overland flowpaths'. This term is used throughout the District Plan and therefore should either be defined or removed to avoid confusion. BOPRC also states that, when referring to catchment, it is clearer to state 'contributing' catchment to reduce confusion. This aligns with	**Support**	The consistent application of rules and policies requires clear terms and definitions. This submission provides useful advice that can improve how overland flowpaths are defined and explained.	We seek that this submission be allowed.

		Tauranga City Council's recently operative Plan Change 27 (Flooding from Intense Rainfall).			
Bay of Plenty Regional Council	45.7	BOPRC support the proposed definition of wildfire and states that the definition gives effect to RPS Policy IR 2B, which requires Councils to have regard to the likely effects of climate change.	**Support**	The definition for wildfire will support clear and consistent application of rules and policy. Including a definition for wildfire is important for ensuring that all natural hazards, including emerging hazards, in Rotorua can have provisions to support risk reduction.	We seek that this submission be allowed.
Bay of Plenty Regional Council	45.8	BOPRC supports the intent of SNDH-O1 but states it is unclear whether this objective only relates to new land use and development or whether it is also intended to capture both existing and new land use and development, such as building extensions. For consistency, it is recommended that the wording be changed from 'land use, subdivision and development' to 'subdivision, land use and/or development'.	**Support**	Clear and consistent objectives are required for the consistently application of rules and policies to support risk reduction. This submission provides useful suggestions to improve clarity for the application of SNDH-O1.	We seek that this submission be allowed.
Bay of Plenty Regional Council	45.13	The submitter considers it unclear whether this policy is also intended to relate to existing development, such as building extensions and/or other sensitive activities, including Low Impact Buildings, which are subsequently converted to residential use, and which may not be captured by the term 'new buildings'. Further, Rule NH-R2 suggests that building extensions (that are not replacement buildings) are relevant to this policy and therefore NH-PAA should be amended to include building extensions (that are not replacement buildings), as well as Low Impact Buildings, which are subsequently converted to residential use, for example.	**Support**	We support amendments to NH-PAA that can improve clarity and consistency. To reduce the impacts to people and property it is important to ensure that all residential properties have rules and provisions that can reduce impacts to people and property. We also support the addition of building extensions to NH-R2 as extensions to buildings can increase the overall level of exposure to natural hazards.	We seek that this submission be allowed.

Bay of Plenty Regional Council	45.14	BOPRC supports the strengthening of this policy as proposed in NH-PA clause 2 but considers that the policy could be further strengthened by stating that consent can be declined if the flood risks are not shown to be acceptable both onsite and offsite. It considers this approach is consistent with RPS Policy NH 4B (managing natural hazard risk on land subject to urban development) and the definition of 'acceptable risk' it proposes.	**Support**	We support additional strengthening of NH-PA. Requiring risk to be acceptable onsite and offsite is a useful way to reduce the impacts to people and property.	We seek that this submission be allowed.
Bay of Plenty Regional Council	45.17	BOPRC understands the intention of broadening this policy and supports its application to areas beyond Ōhinemutu and Whakarewarewa. However, the existing policy also seems to clearly distinguish between existing development and new development, although the proposed new policy only refers to new development, leaving a gap regarding policy intent for existing development.	**Support**	Policies should refer to new and existing developments to reduce impacts to people and property. One of the key challenges for reducing natural hazard risk in New Zealand is managing legacy planning issues. Policies that encompass existing development as well as new development can, therefore, start to address any potential legacy planning issues and reduce impacts to people and property.	We seek that this submission be allowed.
Bay of Plenty Regional Council	45.19	BOPRC supports the policy regarding wildfire. The policy is consistent with the Civil Defence and Emergency Management Act 2002, which identifies wildfire as a risk and has objectives relating to cost effective reduction of risk.	**Support**	Wildfire has the potential to be an emerging hazard and risk for Rotorua. New provisions to manage wildfires can contribute to reducing the impact to people and property. We also support consistency between PC8 and any existing policy such as the Civil Defence and Emergency Management Act 2002.	We seek that this submission be allowed.
Bay of Plenty Regional Council	45.21	BOPRC considers that the rule that permits buildings in floodprone areas that meet minimum floor levels (NH-R4(2)) needs a performance standard worded consistently with NH-R5 (relating to overland flowpaths). This will improve clarity that standards relating to overland	**Support**	We support consistency between rules and policies for floodprone areas and overland flow paths. Overland flowpaths represent low points in terrain where water will preferentially flow during floods, therefore, rules and provisions must be applied to reduce the	We seek that this submission be allowed.

		flowpaths also need to be met for a building to be a permitted activity.		impacts to people and property in flood events.	
Bay of Plenty Regional Council	45.22	BOPRC note that NH-R4, being the permitted activity rule linked to new Rule NH-R5, does not capture conversions of existing buildings from non-habitable to habitable spaces, and therefore will not be subject to new Rule NH-R5. On this basis, BOPRC considers that the heading for NH-R4 should be amended to capture these situations or similar relief.	**Support**	We support amendments to ensure that conversions to habitable buildings are represented in rules and policies. Habitable buildings can have higher levels of risk as they are a place where people spend significant amounts of time. Therefore, to reduce the impacts to people and property PC8 should ensure the rules and policies capture conversions into habitable buildings.	We seek that this submission be allowed.
Bay of Plenty Regional Council	45.34	BOPRC supports the reliance on the Natural Hazards Chapter, which refers to the 1%AEP lake flood level, and the removal of references to the 2%AEP lake flood level.	**Support**	We support referring to a 1% AEP lake flood level. 1% AEP flood levels represent larger events than 2% AEP and so planning to this level represents a precautionary approach and can further reduce the impacts to people and property. Planning to a 1% AEP is also becoming standard across the country with many other councils (such as Wellington City Council, Auckland Council, and Whangarei District Council) adopting minimum floor levels for a 1% AEP flood event.	We seek that this submission be allowed.
R & B Property Group	54.1	The newly mapped fault rupture hazard be removed from Acacia Road unless robust, peer-reviewed scientific evidence is provided to justify its inclusion. Alternatively, that the Acacia Road section be reassessed using the same alternative methodologies, such as geomorphic analysis and lidar interpretation, applied to Spencer Road. Clarification of the rationale for assigning Acacia Road the most restrictive classification by default. A clearly defined process by which fault lines may be reviewed, reassessed, or removed	**Oppose**	We oppose changes to fault rupture provisions. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science[1] in line with guidelines from MfE[2]. We have a high level of confidence in the report as it was completed by a reputable research institute and has been internally peer reviewed. While we acknowledge that there is uncertainty associated with mapping active faults, this should not be used as a reason to change the definition or provisions for Fault Rupture Hazard Areas. The report[1] also specifically	We seek that this submission be disallowed.

		in the future. Assurance that Acacia Road residents will be treated equitably and afforded the same opportunities for review and reclassification as those in other affected areas, including Spencer Road.		states that the mapping is appropriate for a range of uses including "cadastral scales relevant for planners, policymakers and landowners to make decisions about land use..." (p.6). Active faults have the potential to greatly impact people and property. The effects from fault rupture include significant ground movement (often >5m of horizontal movement[2]), which would destroy buildings and infrastructure. The mapping and subsequent provisions for Fault Rupture Hazard Areas in PC8 effectively manage uncertainties in the data and will contribute to reducing impacts to people and property. [1]Morgenstern, R. & Villamor, P., 2025. Active fault mapping and Fault Avoidance Zones for Rotorua Lakes District: An update. GNS Science. [2]MfE, 2003. Planning for Development of Land on or Close to Active Faults. A guideline to assist resource management planners in New Zealand.	
R & B Property Group	54.2	PC8 seeks to remove a number of existing natural hazard maps, including fault avoidance zones, from the district plan, instead proposing to enforce the hazard rule framework through external models and online mapping resources. While the submitters acknowledge the intent to incorporate the most up-to-date information, they consider this approach lacks transparency and undermines the clarity and consistency	**Support**	We support Natural Hazard Overlays remaining within the District Plan. The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying	We seek that this submission be allowed.

		required for effective implementation of the district plan. They consider a 'material incorporated by reference' provision must be subject to the same level of scrutiny and notified in conjunction with the plan change itself. The submitters state that any map or model used to enforce district plan provisions must be robust, reliable, and exhibit a low margin of error. Reliance on external and potentially dynamic sources introduces ambiguity and fails to provide certainty for affected stakeholders, including homeowners, insurers, and developers. This uncertainty compromises the ability of these parties to understand whether their property is subject to hazard-related constraints.		or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used.	