

To the Planning Team, Hurunui District Council

Name of submitter: Sarah-Jayne McCurrach

Organisation: Natural Hazards Commission Toka Tū Ake

Email: resilience@naturalhazards.govt.nz

Date: 13 August 2026

Thank you for the opportunity to submit on Plan Change 7 – Rosewood Terrace.

About the Natural Hazards Commission Toka Tū Ake (NHC)

The Natural Hazards Commission Toka Tū Ake (NHC) is a Crown Entity responsible for providing residential property owners (who have 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). NHC provides limited cover for:

- building and land damage from earthquakes, landslides, tsunami, volcanic and hydrothermal activity, and fire following these hazards, and
- land damage only from storm or flood, and fire following these hazards.

Why NHC is providing this submission

NHC's primary objective is to '*reduce the impact of natural hazards on people, property, and the community*'. To achieve this, the NHI Act requires NHC to facilitate research and education and to share information, knowledge and expertise with the Crown, public and private entities, and the public, including in relation to:

- natural hazards and their impacts
- community resilience to natural hazards
- planning for, and recovering from, natural hazards

As the 'first loss' insurer for residential damage from natural hazards listed in the NHI Act, NHC carries financial risk on behalf of the Crown and sees hazard impacts firsthand through the claims we receive. This gives NHC strong insight into, and a strong interest in, reducing risk and building resilience to natural hazards across New Zealand.

Our research and education investments help translate evidence into policy and planning that supports long-term resilience. We encourage building in areas that will remain safe and sustainable for future generations and avoiding development in high-risk hazard zones where future owners may face complex and potentially hazardous situations that compromise safety and longevity.

Climate change is increasing the frequency and severity of natural hazards covered by the NHC Scheme. We therefore support clear, risk-based policy frameworks that enable resilient, sustainable land use planning, and support community education and resilience.

In submissions on council strategies and plans, we focus on the suitability of land proposed for development *without* mitigation. We do not submit on individual planned or proposed developments; councils decide whether risks can be managed and whether appropriate mitigation and management is in place for individual consent applications.

Our advice is not intended to impede development; it is to highlight the need for careful, precautionary choices that support resilient, sustainable communities. We aim to help councils ask the right questions and make risk-informed decisions.

Accordingly, we encourage councils to consider the future risks and impacts a district plan may create, and to be satisfied that:

- Natural hazard risk is assessed on a multi-hazard basis, across multiple timeframes, out to at least 50 (preferably 100) years, using multiple climate change scenarios.
- Risks are mitigated to levels the community and council consider tolerable (for example, whether ongoing 'nuisance flooding' is acceptable).
- New developments do not create new/increased risks, now or in the future.
- There is a plan to manage any residual risks after mitigation.
- The 'status quo' of risk and risk tolerance is appropriate for long-term decisions (for example, existing flood-, liquefaction- or tsunami-prone communities are not justification for new development to face the same risks).

Where there is any doubt, we encourage councils to engage with private insurers to understand their tolerance for insuring locations, risks and developments. Insurability should be a key consideration when assessing the risks and impacts on future communities.

The Amberly Beach settlement in the Hurunui District is exposed to a range of different natural hazards including coastal inundation, coastal erosion, pluvial and fluvial flooding, rising groundwater, and high liquefaction potential. Multiple hazard and risk assessments have identified that the effects of climate change will cause these hazards to worsen, limiting the effectiveness of certain mitigation options and exposing more buildings and assets to damage over time. The proposed new area for development is only exposed to landslide hazards, which has long-term mitigation solutions available for reducing risk.

NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. Plan Change 7 – Rosewood Terrace contains provisions that we support in this regard.

We welcome the opportunity to discuss our submission with council officers and provide further assistance, 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 5, Clause 6 of Schedule 1, Resource Management Act 1991

Natural Hazards Commission Toka Tū Ake Submission on Plan Change 7 – Rosewood Terrace

To: Hurunui District Council

Via Council submission email: planning@hurunui.govt.nz

Submitter: Natural Hazards Commission Toka Tū Ake (NHC)

1. This is a submission on the following:

The Plan Change 7 – Rosewood Terrace notified on 9/07/2026.

2. NHC could not gain an advantage in trade competition through this submission.

3. NHC does not wish to be heard in support of this submission.

4. This document and the attached Appendices comprise the NHC submission. This submission relates to Plan Change 7 – Rosewood Terrace in its entirety.

5. The submission from NHC is:

NHC supports, is neutral, and opposes Plan Change 7 – Rosewood Terrace to the extent outlined in this submission.

- a) **Identification of suitable areas for development** – NHC supports rezoning land to enable the relocation of the Amberley Beach community to areas that are not exposed to climate related hazards including fluvial and pluvial flooding, coastal erosion, coastal flooding, and rising groundwater.
- b) **No Build Areas within the Rosewood Terrace area** – NHC supports the use of No Build Areas where these are needed to manage landslide risk. Landslides can damage buildings, land and infrastructure, including where land falls away beneath a property or debris inundates a property. No Build Areas help reduce exposure to landslide hazards and minimise potential impacts on people and property.

Provided at Appendix 1 is a table containing submission points that address the above, and other matters of relevance.

6. NHC seeks the following decision from the local authority:

That the specific amendments, additions or retentions which are sought as specifically outlined in Appendix 1, are accepted and adopted into Plan Change 7 – Rosewood Terrace, including such further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Date: 13/08/2026

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Appendix 1

Provision	Description	Support/ Oppose/ Amend	Reasoning	Requested Action
Planning Maps	Rezone part of the property at 185 Ashworths Road, Amberley, Lot 1 DP 36474, to Residential 1, and apply an Outline Development Zone overlay.	Support	NHC supports the rezoning of this area where it enables the proactive relocation of the Amberley Beach community. The Amberley Beach community is exposed to a range of natural hazards, including pluvial and fluvial flooding, coastal inundation and erosion, and rising groundwater, all of which are projected to worsen with climate change. In addition, the area is highly susceptible to liquefaction, with the likelihood and severity of liquefaction impacts potentially increasing as groundwater levels rise. This significant and increasing hazard exposure highlights the need for climate adaptation and supports efforts to relocate the community to a lower-risk location. This plan change represents practical steps to enable climate adaptation, while also not increasing exposure to other natural hazards. The proposed area to relocate to has low exposure to natural hazards and where the site is exposed to landslide risk mitigations have been applied. Enabling residential development in lower-risk locations helps support future adaptation needs while avoiding further development in hazard-prone areas. This can reduce the long-term impacts of natural hazards on people, property, and communities.	Retain the proposed planning map changes.
Policy 4.32	To manage subdivision, development and land use in the Rosewood Terrace Management Area to create	Support	NHC supports directing residential development away from areas of slope instability. Landslides can damage buildings, land and infrastructure, and may pose risks to people and property. Locating development away from	Retain the provision.

NOT GOVERNMENT POLICY

	a residential community with the following features: (v) The location of residential development away from areas of slope instability		these areas is an important way to avoid or reduce future natural hazard impacts.	
Rule 4.6.25	25. Rosewood Terrace Management Area additional standards (a) No building shall be located within the No Build Area shown in the Rosewood Terrace Management Area Outline Development Plan.	Support	NHC supports the use of a No Build Area where it reflects the recommendations of the geotechnical assessment. Avoiding buildings in areas identified as having slope instability risk supports a risk-based approach and can reduce the impacts to people and property.	Retain the provision.