To the Planning Team, Central Hawke's Bay District Council

Name of submitter: Sarah-Jayne McCurrach

Organisation: Natural Hazards Commission Toka Tū Ake

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Date: 23 March 2026

Thank you for the opportunity to submit on Plan Change One – Adoption of the Waipukurau South Structure Plan and Development Area Chapter (Plan Change One)

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 development does not create new or increased risks for neighbouring suburbs, 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 active Waipukurau Fault Zone crosses the proposed Development Area, exposing multiple fault traces. This poses significant risks of ground shaking and deformation during a fault rupture; ground deformation can severely damage or destroy buildings, including those with relatively high resilience, and cannot be mitigated except by avoidance. NHC therefore encourages avoiding development of residential properties and critical infrastructure within 20m of active faults in order to minimise property damage and maximise continuity of use of buildings in the event of an earthquake.

NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. Plan Change One contains provisions that we support in this regard, and we have provided suggestions in other areas that could be improved.

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

Form 5, Clause 6 of Schedule 1, Resource Management Act 1991

Natural Hazards Commission Toka Tū Ake Submission on Plan Change One – Adoption of the Waipukurau South Structure Plan and Development Area Chapter

To: Hawke's Bay District Council

Via Council submission email: districtplan@chbdc.govt.nz

Submitter: Natural Hazards Commission Toka Tū Ake (NHC)

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1. This is a submission on the following:

Plan Change One – Adoption of the Waipukurau South Structure Plan and Development Area Chapter notified on 09/03/2026.

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 One – Adoption of the Waipukurau South Structure Plan and Development Area Chapter in its entirety.

5. The submission from NHC is:

NHC supports, is neutral, and opposes the Plan Change One – Adoption of the Waipukurau South Structure Plan and Development Area Chapter to the extent outlined in this submission.

a) **Inclusion of provision to restrict residential development in Fault Avoidance Zones** – The proposed Development Area contains multiple active faults as part of the Waipukurau Fault Zone. NHC recommends avoiding subdivision for residential development within Fault Avoidance Zones.
b) **Development of transport infrastructure resilient to earthquake and fault rupture hazard** – NHC supports incorporating resilience of road and transport networks within subdivision planning.

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 One – Adoption of the Waipukurau South Structure Plan and Development Area Chapter, including such further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Date: 24/03/2026

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Appendix 1: NHC Submission Table

Provision	Description	Support/ Oppose/ Amend	Reasoning	Requested Action
DEV-O2	**Subdivision outcomes** Development of the area contributes positively to urban growth in Waipukurau by ensuring that: a. New east/west transport connections are made across the site, including for walking and cycling; and b. Wetlands within the site are protected and enhanced through the creation of reserves and development design; c. Stormwater management is incorporated with public open spaces to promote biodiversity, safety and connectivity; d. Cultural values are recognised and provided for.	Amend	NHC recommends that critical infrastructure and residential buildings are avoided within Fault Avoidance Zones. We support the recommendation provided in the T+T report *Waipukurau South Growth Cell Desktop Assessment of Natural Hazards* that subdivision for residential development is avoided on an intermediate scale by development away from the Fault Avoidance Zones mapped by GNS Science in 2014, or on the smallest scale by further site specific investigations. We acknowledge that the Natural Hazards chapter of the Central Hawke's Bay District Plan contains provisions that generally follow the advice in MfE's *Planning for Development of Land on or Close to Active Faults (2003)*, with development of category 2b and 3 restricted within the Fault Avoidance Zones as recommended for faults of this recurrence interval. However, we encourage avoiding residential development within fault avoidance zones unless site specific investigation determines that the building platform is 20m away from the fault. This is particularly appropriate where faults are well mapped, discrete, and clearly visible in the landscape, as in this case. We recommend a focus on retaining use of critical infrastructure and dwellings in the wake of an earthquake, instead of using life-safety as a baseline for resilience. The primary hazard within Fault Avoidance Zones is ground deformation caused by fault rupture. This can cause severe damage to buildings and infrastructure in a	That the following amendment is made: Subdivision outcomes Development of the area contributes positively to urban growth in Waipukurau by ensuring that: a. New east/west transport connections are made across the site, including for walking and cycling; and b. Wetlands within the site are protected and enhanced through the creation of reserves and development design; c. Stormwater management is incorporated with public open spaces to promote biodiversity, safety and connectivity; d. Cultural values are recognised and provided for~~.~~; e. Residential dwellings are not located within 20m of an active fault.

			large earthquake and cannot be easily mitigated by building design or engineering.	
DEV1-P8	**Natural Hazards and Roading Infrastructure** Promote the location and design of roads and transport infrastructure to follow the direction of fault lines, where practicable to reduce the risk of rupture related damage.	Support	NHC supports efforts to design subdivisions in a way that lessens natural hazard risk. Roading infrastructure which is resilient to the effects of ground deformation from fault rupture helps to ensure that emergency services vehicles are able to access residents affected by an earthquake. We therefore support minimising the number of times road infrastructure crosses the faults.	That the provision is retained.
DEV-AM6	**Natural Hazards and Infrastructure** 1. Whether the location and design of roads and transport infrastructure: a) Minimises the need for road crossings over active faults and where no feasible alternative exists, the mitigation measures that are proposed to manage associated risks. b) Contributes to the resilience of the transport network, including consideration of emergency access routes;	Support	NHC supports efforts to design subdivisions in a way that lessens natural hazard risk. Roading infrastructure which is resilient to the effects of ground deformation from fault rupture helps to ensure that emergency services vehicles are able to access residents affected by an earthquake. We therefore support minimising the number of times road infrastructure crosses the faults.	That the provision is retained.