To the Planning Team, Tararua District Council

Name of submitter: Sarah-Jayne McCurrach

Organisation: Natural Hazards Commission Toka Tū Ake

Email: resilience@naturalhazards.govt.nz

Date: 02/10/2026

Thank you for the opportunity to submit on Plan Change A – Growth Areas.

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 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.

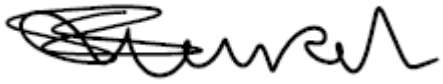
The Tararua District has a history of earthquakes and has many known active faults[1], which can generate ground shaking, ground-surface fault rupture, and deformation[2]. Parts of Tararua District are also exposed to liquefaction, landslides (earthquake and rainfall induced) and floods, which have the potential to impact people and property. Natural hazard risk should therefore be a key consideration when identifying areas for residential growth.

NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. Natural hazards may be unavoidable, but exposure and vulnerability can be reduced through risk-informed land-use planning. Plan Change A – Growth Areas contains provisions that we support in this regard, and we have provided suggestions in other areas that could be improved. Our amendments are intended to prevent new or increased risk, avoid transferring risk to neighbouring land or future communities, and ensure any residual risk is understood and appropriately managed.

[1] https://experience.arcgis.com/experience/3f7b4ec2f6f14503af1146ce412de39e/page/Fault-Lines/
[2] gis.tararuadc.govt.nz/Tararua/FAAFAZ/CR2021-03_Active_Fault_Mapping_for_Tararua_District_FINAL.pdf

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 A – Growth Areas.

To:	**Tararua District Council**
	Via Council submission email: PlanChangeA@tararuadc.govt.nz
Submitter:	Natural Hazards Commission Toka Tū Ake (NHC)

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1. This is a submission on the following:

The Plan Change A – Growth Areas notified on 07/09/2026.

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 A – Growth Areas in its entirety.

5. The submission from NHC is:

NHC supports, supports in part, and seeks amendments to Plan Change A – Growth Areas, as outlined in this submission and Appendix 1.

1. **Proposed residential growth areas** – NHC supports the proposed residential growth areas in Dannevirke, Woodville and Eketāhuna, subject to our suggested amendments to DEV01-P6 being accepted.
2. **Pahiatua proposed residential growth areas** – NHC supports in part and seeks amendments to ensure that fault avoidance zones are added to avoid fault rupture hazard associated with active faults.
3. **Resilient subdivision and building platforms** – NHC supports provisions requiring subdivision to be resilient to natural hazards and climate change and requiring stable, flood-free building platforms.
4. **Clarification of natural hazards risk provision** – NHC seeks amendments to define or provide a metric for significant natural hazard risk. This should be informed by the National Policy Statement for Natural Hazards (NPS-NH) and would support consistent interpretation and application of rules and policies.

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 A – Growth Areas, including such further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Date:	02/10/2026
Address for service:	Natural Hazards Commission Toka Tū Ake PO Box 790, Wellington 6140
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Appendix 1

Provision	Description	Support/ Oppose/ Amend	Reasoning	Requested Action
Proposed Residential Growth Development Areas				
Dannevirke, Eketāhuna, Woodville Proposed Residential Growth Areas	-	**Support**	NHC supports residential growth in these areas as there is low exposure to flood hazards[1,2], active faults[3], and liquefaction[4]. In areas where liquefaction damage is possible, subdivision should be supported by a detailed area-wide assessment to identify appropriate risk mitigation measures[5]. Within this Plan Change, Policy DEV01-P6 could help achieve this by requiring ground conditions to be assessed and liquefaction risk to be appropriately managed, reducing potential impacts on people and property. While we support these growth zones, we note that NHC has also recommended amendments to DEV01-P6 as part of this submission. [1] River Edge Consulting. (2024). Appendix 3: Tapuata stream flood assessment. Tararua District Council. tararuadc.govt.nz/__data/assets/pdf_file/0022/214429/Appendix-3-Tapuata-Stream-Flood-Assessment-completed-by-River-Edge-Consulting.PDF. [2] Tararua District Council. (2019). District Plan Flood Maps 1-10 [3] Tararua District Council. (2024). Tararua District Faultlines | Tararua District Council Open Data [4] Tonkin + Taylor Ltd. (2021). Tararua District Liquefaction Vulnerability Report [5] Ministry of Business, Innovation and Employment, Ministry for the Environment, & Earthquake Commission. (2017). Planning and engineering guidance for potentially liquefaction-prone land: Resource Management Act and Building Act aspects.	Retain the proposed growth areas, subject to our suggested amendments on DEV01-P6.

			https://www.building.govt.nz/assets/Uploads/building-code-compliance/b-stability/b1-structure/planning-engineering-liquefaction.pdf	
Pahiatua Proposed Residential Growth Areas	-	**Support in part**	NHC seeks amendments to the Pahiatua Residential Growth Areas. These areas are exposed to multiple natural hazards, including flooding[1], active fault lines[2], and liquefaction[3]. Increasing residential development in areas subject to one or more natural hazards without sufficient provisions would increase risks to people and property and create long-term residual risk. NHC recommends that active faults are managed through fault avoidance zones in accordance with Ministry for the Environment guidance[4]. This means that fault rupture hazard can be avoided, which will reduce impacts to people and property. In areas where liquefaction damage is possible, subdivision should be supported by a detailed area-wide assessment to identify appropriate risk mitigation measures[5]. Within this Plan Change, Policy DEV01-P6 could help achieve this by requiring ground conditions to be assessed and liquefaction risk to be appropriately managed, reducing potential impacts on people and property. We note that NHC has also recommended amendments to DEV01-P6 as part of this submission. [1]Tararua District Council. (2019). District Plan Flood Maps 1-10 [2]Tararua District Council. (2024). Tararua District Faultlines | Tararua District Council Open Data [3]Tonkin + Taylor Ltd. (2021). Tararua District Liquefaction Vulnerability Report [4]Ministry for the Environment. (2003). Planning for development of land on or close to active faults: A guideline to assist resource management planners in New Zealand. Planning for development of land on or close to active faults: A guideline to assist resource	Include a fault avoidance zone within the Pahiatua Proposed Residential Growth Area. Ensure liquefaction hazard is assessed and managed, noting our suggested amendments to DEV01-P6.

			management planners in New Zealand | Ministry for the Environment [5]Ministry of Business, Innovation and Employment, Ministry for the Environment, & Earthquake Commission. (2017). Planning and engineering guidance for potentially liquefaction-prone land: Resource Management Act and Building Act aspects. https://www.building.govt.nz/assets/Uploads/building-code-compliance/b-stability/b1-structure/planning-engineering-liquefaction.pdf	
1.2 DEV01 – GRZ – Residential Growth Development Areas (RGDA)				
DEV01-O2	Subdivision is designed and located in a manner that contributes to achieving a well-functioning urban environment that: 5. Are sustainable and resilient to natural hazards and climate change impacts.	**Support**	NHC supports this provision because it ensures that subdivision is sustainable and resilient to natural hazard and climate change impacts. Explicitly addressing climate change is necessary to strengthen the long term-resilience of people and property, as it will intensify many of the impacts from natural hazards.	Retain the provision
DEV01-O5	Avoid adverse effects from natural hazards by ensuring subdivision does not occur in areas where significant risk of material damage exists unless such risks can be adequately remedied or mitigated.	**Amend**	NHC supports this provision as it seeks to avoid subdivision where significant natural hazard risk exists unless that risk can be adequately remedied or mitigated. However, the provision does not define or provide criteria for determining when the risk is "significant" which may lead to inconsistent interpretation and application. NHC seeks an amendment requiring determination of "significant risk". As a starting point, the NPS-NH provides guidance for defining significant risk, noting that the NPS-NH does not preclude decision-makers from managing natural hazard risk beyond the application of the NPS-NH, including applying a more conservative approach to managing natural hazard risks where appropriate. Providing a clear definition will support consistent, risk-informed decision-making and reduce the likelihood of new	Include a definition and/or metric to determine what natural hazard risk is deemed "significant" by the Council.

			development exposing people and property to intolerable natural hazard risk.	
DEV01-P6	Subdivision and associated earthworks must have regard to ground conditions and natural hazards including liquefaction and flood risks.	**Amend**	NHC supports consideration of ground conditions and natural hazards but seeks stronger wording. As drafted, 'must have regard to' may only require consideration of risk and does not necessarily ensure that any identified risks are avoided or mitigated. This may result in inconsistent interpretation and application. NHC recommends requiring significant natural hazard risk to be avoided, where practicable, or otherwise mitigated. This would provide clearer direction for decision makers and help reduce the potential impacts of natural hazards on people and property. NHC also recommends requiring an assessment of all relevant natural hazards, including but not limited to liquefaction, active faults, landslides, floods and erosion. This would ensure all potential hazards are identified, assessed, and appropriately managed before development, reducing future exposure and residual risk.	The following amendments are made: Subdivision and associated earthworks ~~must have regard to~~ must avoid, where practicable, or otherwise mitigate risks from ground conditions and natural hazards including liquefaction, active faults, landslides, flood and erosion risks.
DEV01-SUB-R1	Activity Status: Restricted Discretionary n. Effects on the stability of land and buildings, and potential to create new or exacerbate existing natural hazards.	**Support**	NHC supports the inclusion of effects on land and building stability, and the potential to create new or exacerbate existing natural hazards, as matters of discretion. These matters of discretion enable the Council to assess whether subdivision will create or worsen natural hazard risk. This supports risk-informed decision-making and can reduce impacts to people and property.	Retain the provision.
DEV01-S2 – Building Platforms	2. Each allotment must provide a stable, flood-free (0.5%AEP protection plus freeboard) building platform suitable for building foundations.	**Support**	NHC supports this provision. The proposed growth areas have a relatively low susceptibility to flooding, and the requirement for stable building platforms protected from a 0.5% AEP flood event, including freeboard, provides an appropriate and precautionary level of resilience for residential development.	Retain the provision.

DEV01-S2 – Building Platforms	3. Provision of a geotechnical investigation of each stage including recommendations on mitigation of risk of liquefaction including earthworks, stormwater ponds, services, stormwater conveyance, road construction and building foundations.	**Support in part/ Amend**	NHC supports requiring geotechnical investigations and recommendations to mitigate liquefaction risk. However, the term "each stage" could be misinterpreted and preclude initial geotechnical investigations of an entire development at subdivision consent stage. If a geotechnical investigation is deferred until individual stages are developed, the consent authority may be unable to adequately assess development-wide risk, interactions between stages, and residual risk. NHC therefore seeks a preliminary geotechnical investigation of the entire proposed development when subdivision consent is sought, followed by detailed investigations for each stage.	The following amendment is made: Provision of a preliminary geotechnical investigation for the entire proposed development at the time of the subdivision consent application, followed by a detailed geotechnical investigation for each stage before its development. The investigations should assess liquefaction risk; recommend measures to avoid or mitigate that risk in relation to earthworks, stormwater ponds, services, stormwater conveyance, road construction, and building foundations; and identify the residual risk(s) after mitigation.