

To the Planning Team, Tasman District Council

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Organisation: Natural Hazards Commission Toka Tū Ake

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Date: 31/07/2026

Thank you for the opportunity to submit on Plan Change 81 – Urban Development.

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).

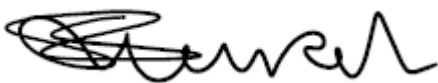
Where there is any doubt, we encourage councils to engage with private insurers to understand their tolerance for insuring locations, risks and developments. Insurability should be a key consideration when assessing the risks and impacts on future communities.

Tasman District is at risk from many natural hazards, including earthquakes, liquefaction, coastal hazards, flooding, landslides, and wildfire. Climate change is expected to increase sea level and the intensity of rainfall events and the severity and length of drought in Tasman District in the next 20 years. These changes are likely to increase the district's risk of flooding, landslides, liquefaction, coastal hazards and wildfire. Natural hazard risk should therefore be a key consideration when identifying areas suitable for intensified development.

NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. Plan Change 81 – Urban Development 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,
Head of Risk Reduction

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

Natural Hazards Commission Toka Tū Ake Submission on Plan Change 81 – Urban Development

To: Tasman District Council

Via Council submission email: tasmanrmp@tasman.govt.nz

Submitter: Natural Hazards Commission Toka Tū Ake (NHC)

1. This is a submission on the following:

The Plan Change 81 – Urban Development notified on 19/06/2026.

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 81 – Urban Development in its entirety.

5. The submission from NHC is:

NHC supports, is neutral, and opposes the Plan Change 81 – Urban Development to the extent outlined in this submission.

- a) **Clear thresholds and assessment criteria for mitigation** – NHC seeks clearer wording, definitions, or assessment criteria for terms such as ‘appropriately mitigated’ and ‘significant flood hazard risk’ so that flood and dam break risks are assessed consistently.
- b) **Flood risk, setbacks, and effects beyond the site** – NHC supports provisions that require flood flow paths, building locations, access, and the effects of mitigation on neighbouring properties to be considered. We seek that setbacks and development controls are informed by flood modelling and site-specific hazard information.
- c) **Dam break hazard risk** – NHC supports the identification and management of potential dam break hazard risk in the relevant development areas. We seek clearer direction on what assessment and management of this risk should include, such as warning time, safe access and egress, evacuation, residual risk, and downstream effects.
- d) **Scope of natural hazard matters** – NHC seeks amendments so that relevant matters of discretion are not limited to flood hazards where broader natural hazard risks may also affect the suitability and long-term resilience of development.
- e) **Risk matrix assessment** – We support the assessment undertaken against the National Policy Statement for Natural Hazards (NPS-NH). It provides a useful framework for determining the suitability of locations across the district for future development.

We particularly support the approach used to identify plausible mitigation measures and assess consequences based on the proposed land use, as the vulnerability and level of risk can vary significantly depending on how a site is used.

Where practicable, we encourage Council to go beyond the minimum requirements of the NPS-NH and consider the cumulative and compounding effects of multiple hazards on a site, to ensure overall risk remains within the Council's risk tolerances. However, we do not seek amendments to the current approach, as it is consistent with the requirements of the NPS-NH.

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 81 – Urban Development, including such further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Date: 31/07/2026

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Appendix 1

Provision	Description	Support / Oppose / Amend	Reasoning	Requested Action
Proposed zoning				
T-22b, T-22c, T-178a, T-232a, T-232b, T-29a, T-29c, T-194a, T-194c, T-33a, T-33b, T-002, T-103	Medium Density Residential Zone Low flood risk	Support	We support medium density residential development in areas of low flood risk. The mitigation options identified in the assessment against the NPS-NH are plausible ways to reduce flood risk and the impacts on people and property.	Retain the provision.
T-22a, T-237a, T-237g	Medium Density Residential Zone Low flood risk, medium tsunami risk	Support	We support medium density residential development where there is low flood risk and medium tsunami risk, after mitigations have been applied. This aligns with the NPS-NH, which enables development in medium risk areas where appropriate mitigation is in place. We also recommend that Council considers the cumulative and compounding effects of natural hazards. Cumulative hazards occur where two or more unrelated natural hazard events have the potential to affect human life and/or property¹, while compounding hazards are where one hazard amplifies or makes the effects of another hazard	Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.

NOT GOVERNMENT POLICY

			worse. Although a site may be suitable for development when individual hazards are considered in isolation, the combined effect of multiple hazards can result in a higher overall level of risk. These sites are exposed to both flood and tsunami risk, and the cumulative and compounding effects of these hazards should be considered when determining their suitability for development. The effect of cumulative and compounding hazards could be considered when assessing areas for urban growth. For example, an additional policy as part of 6.2.3 <i>Land Effects from Urban Growth</i> could be added; avoid development expanding into areas where the risk from cumulative and compounding natural hazards is unacceptable. NHC's Risk Tolerance Methodology² could assist Council to determine what level of risk is acceptable. Accounting for these types of hazards ensures that risk remains at acceptable levels and can help to reduce the impacts on people and property. ¹Auckland Council, 2014. Natural hazard risk communication toolbox. ²NHC, 2025. Risk Tolerance Methodology.	
T-246a, T-246b	Medium Density Residential Zone Medium tsunami risk	Support	We support medium density residential development where there is medium tsunami risk, after mitigations have been applied. This aligns with the NPS-NH, which enables development in	Retain the provision.

NOT GOVERNMENT POLICY

			medium risk areas where appropriate mitigation is in place. Evacuation can be an appropriate way to manage tsunami risk where safe and practical routes are identified, maintained, and incorporated into development planning.	
T-11a, T-112a, T-112b, T-115a, T-138a	Medium Density Residential Zone Low flood risk, low liquefaction, medium tsunami risk	Support	We support medium density residential development where there is low flood risk, low liquefaction risk, and medium tsunami risk after mitigations have been applied. This aligns with the NPS-NH, which enables development in medium risk areas where appropriate mitigation is in place. We also recommend that Council considers the cumulative and compounding effects of natural hazards. Cumulative hazards occur where two or more unrelated natural hazard events have the potential to affect human life and/or property¹, while compounding hazards are where one hazard amplifies or makes the effects of another hazard worse. Although a site may be suitable for development when individual hazards are considered in isolation, the combined effect of multiple hazards can result in a higher overall level of risk. These sites are exposed to flood, liquefaction, and tsunami risk, and the cumulative and compounding effects of these hazards should be considered when determining their suitability for development.	Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.

			The effect of cumulative and compounding hazards could be considered when assessing areas for urban growth. For example, an additional policy as part of 6.2.3 <i>Land Effects from Urban Growth</i> could be added; avoid development expanding into areas where the risk from cumulative and compounding natural hazards is unacceptable. NHC's Risk Tolerance Methodology² could assist Council to determine what level of risk is acceptable. Accounting for these types of hazards ensures that risk remains at acceptable levels and can help to reduce the impacts on people and property. ¹Auckland Council, 2014. Natural hazard risk communication toolbox. ²NHC, 2025. Risk Tolerance Methodology.	
T-190a, T-190b, T-190c, T-190d	Medium Density Residential Zone Medium flood risk, low liquefaction risk, medium tsunami risk, medium coastal inundation risk	Support	We support medium density residential development where there is medium flood risk, low liquefaction risk, medium tsunami risk, and medium coastal inundation risk, after mitigations have been applied. This aligns with the NPS-NH, which enables development in medium risk areas where risk can be appropriately managed. We also recommend that Council considers the cumulative and compounding effects of natural hazards. Cumulative hazards occur where two or more unrelated natural hazard events have the	Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.

		potential to affect human life and/or property¹, while compounding hazards are where one hazard amplifies or makes the effects of another hazard worse. Although a site may be suitable for development when individual hazards are considered in isolation, the combined effect of multiple hazards can result in a higher overall level of risk. These sites are exposed to flood, liquefaction, coastal inundation, and tsunami risk, and the cumulative and compounding effects of these hazards should be considered when determining their suitability for development. The effect of cumulative and compounding hazards could be considered when assessing areas for urban growth. For example, an additional policy as part of 6.2.3 <i>Land Effects from Urban Growth</i> could be added; avoid development expanding into areas where the risk from cumulative and compounding natural hazards is unacceptable. NHC's Risk Tolerance Methodology² could assist Council to determine what level of risk is acceptable. Accounting for these types of hazards ensures that risk remains at acceptable levels and can help to reduce the impacts on people and property. ¹Auckland Council, 2014. Natural hazard risk communication toolbox.	
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			² NHC, 2025. Risk Tolerance Methodology .	
T-11b, T237b, T-240a, T-240b	Medium Density Residential Zone Low flood risk, low liquefaction risk, low coastal inundation risk, medium tsunami risk	Support	We support medium density residential development where there is low flood risk, low liquefaction risk, low coastal inundation risk, and medium tsunami risk, after mitigations have been applied. This aligns with the NPS-NH, which enables development in medium risk areas where appropriate mitigation is in place. We also recommend that Council considers the cumulative and compounding effects of natural hazards. Cumulative hazards occur where two or more unrelated natural hazard events have the potential to affect human life and/or property¹, while compounding hazards are where one hazard amplifies or makes the effects of another hazard worse. Although a site may be suitable for development when individual hazards are considered in isolation, the combined effect of multiple hazards can result in a higher overall level of risk. These sites are exposed to flood, liquefaction, coastal inundation, and tsunami risk, and the cumulative and compounding effects of these hazards should be considered when determining their suitability for development. The effect of cumulative and compounding hazards could be considered when assessing areas for urban growth. For example, an additional policy as	Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.

			part of 6.2.3 <i>Land Effects from Urban Growth</i> could be added; avoid development expanding into areas where the risk from cumulative and compounding natural hazards is unacceptable. NHC's Risk Tolerance Methodology² could assist Council to determine what level of risk is acceptable. Accounting for these types of hazards ensures that risk remains at acceptable levels and can help to reduce the impacts on people and property. ¹Auckland Council, 2014. Natural hazard risk communication toolbox. ²NHC, 2025. Risk Tolerance Methodology.	
Chapter 2: Meanings of words				
Net density	The area (ha) excludes land that is: constrained by natural hazards, including earthquake, slope instability, ground subsidence and inundation.	Support	We support the definition of net density excluding land that is constrained by natural hazards. This helps avoid creating expectations for intensification in areas where future development may increase exposure of people and property to natural hazards.	Retain the provision.
6.1 Tākaka				
6.10.3.3 Policies	To enable residential activities, including on the ground floor, in the Commercial Zone in Motupipi	Support with amendments	We support residential activities being enabled only where flood risks are appropriately mitigated. However, the term 'appropriately mitigated' should	The following amendment is made: Include a definition, policy direction or assessment criteria that clarifies

	Street, where flood risks are appropriately mitigated.		be clearly defined or supported by measurable assessment criteria. Without a clear threshold or definition, there may be uncertainty about the level of mitigation that is required, which could lead to inconsistent decision-making. This is important because inconsistent interpretation and application of flood risk management requirements could result in development occurring in locations where risk remains high, potentially increasing exposure to flooding hazards over time.	what ‘appropriately mitigated’ means for flood risk. This could include acceptable levels of residual risk, finished floor levels, requirements for safe access and egress routes, and preventing flooding on neighbouring properties.
6.15 Māpua/Ruby Bay				
6.15.1.11 Issues	The need to manage the potential dam break hazard risk from the dam off Seaton Valley Road.	Support	We support the identification of the potential dam break hazard risk from the dam off Seaton Valley Road. Dam break flooding can be difficult to manage because it is often rapid onset with limited warning time. Including this issue in the plan supports risk-based planning and can help reduce impacts on people and property.	Retain the provision.
6.15.23 Policies	To ensure that subdivision and development within the Seaton Valley Outline Spatial Plan area appropriately identifies and manages the potential effects of a dam break hazard from the dam at 75 Seaton Valley Road, Māpua, by requiring assessments of dam	Support with amendments	We support requiring dam break risk assessments for residential development located downstream of the dam at 75 Seaton Valley Road. Assessing risk for residential property supports a risk-based planning approach and can reduce the impact of natural hazards on people and property. However, we recommend that the Policy is more specific about appropriate management and the matters	The following amendment is made: Outline the requirements for assessing dam break risk and include a definition, policy direction or assessment criteria that clarifies what ‘appropriately mitigated’ means for dam break risk. This could include consideration of

	break risk for any residential development located downstream of the dam.		that must be addressed through assessment and mitigation. This will improve clarity and ensure that risk assessments are applied consistently.	flood depth and velocity, warning time, safe access and egress, evacuation routes, residual risk, and any effects on neighbouring sites and downstream areas.
6.15.20.1 Methods of Implementation (Regulatory)	(j) Requiring applications for residential development downstream of the existing dam within the Seaton Valley Outline Spatial Plan area to demonstrate how dam break hazard risks have been assessed and managed.	Support	We support this regulatory method because it provides a clear mechanism for ensuring dam break hazard risk is assessed and managed. Requiring applications to demonstrate how the risk has been assessed and managed helps give effect to the related issue and policy direction for the Seaton Valley Outline Spatial Plan area. It also supports consistent decision-making and can help to reduce the impact of natural hazards on people and property.	Retain the provision.
6.16 Brightwater				
6.16.1.1 Issues	Recognition of flood hazard risk on the low-lying land in the vicinity of the Wairoa and Wai-iti rivers and the Pitfure and Mt Heslington streams, and possible dam break hazard on the land between Katania Heights Road and the Brightwater Deviation State Highway in the Brightwater Development Area.	Support	We support the recognition of flood hazard risk and possible dam break hazard in the Brightwater Development Area. Flooding can damage property and cause significant disruptions to communities. While dam break flooding is often rapid onset with limited warning time. Identifying these hazards as part of the issues in the plan is important because it provides the basis for policies and rules to reduce the impact of natural hazards on people and property.	Retain the provision.

6.16.3.3A Policies	To manage subdivision and development of residential land in the Brightwater Development Area between Pitfure Stream, State Highway 6, and Lord Rutherford Road to avoid significant flood hazard risks on the site and beyond the site, and possible dam break hazard in the Brightwater Development Area between Katania Heights Road and the Brightwater Deviation State Highway.	Support with amendments	We support this policy because it seeks to manage subdivision and development to avoid flood hazard risks and dam break flood hazard. We recommend that a definition for ‘significant flood hazard risks’ is provided. This would increase clarity and ensure consistent decision-making. We also recommend providing more guidance on what is required to avoid the dam break flood hazard. The current wording of this policy does not make it clear whether the hazard should be managed (i.e. measures put in place to mitigate the hazard) or avoided (i.e. no development is allowed in areas exposed to the hazard). Providing more explanation would increase clarity and ensure consistent decision-making to reduce impacts to people and property.	The following amendments are made: A definition for significant flood hazard risks is provided. For example, this could align with the NPS-NH – “natural hazard risk being defined as ‘medium’, ‘high’, and ‘very high’ using the risk matrix.” Increased clarity about whether dam break hazard should be avoided or mitigated. For example, providing guidance about how dam break hazard could be managed, or identifying an area where no residential development is permitted to avoid the dam break flood hazard.
16.3.3A Medium Density Residential Zone				
16.3.3A.2 Controlled Subdivision – Medium Density Residential Zone – Vacant Allotment in	Flooding: (35) Protection for flood flow paths during a 1 percent Annual Exceedance Probability event; (36) the effects of a 1 percent Annual Exceedance Probability	Support with amendments	We support these provisions because they require flood risk to be considered at subdivision stage. Protecting flood flow paths, ensuring building locations are not subject to inundation in a 1% Annual Exceedance Probability flood event, and	The following amendment is made: (36) the effects of a 1 percent Annual Exceedance Probability flood event are mitigated so that any identified building location,

Outline Spatial Plan area	flood event are mitigated so that any identified building location is not subject to inundation; and (37) the effects of any proposed mitigation on other properties.		considering the effects of mitigation on other properties are all useful ways to manage flood risk. We recommend being more specific about what aspects of a building location are required to be free from inundation. For example, does this include access ways and other land? Providing more detail can increase clarity and ensure more consistent decision-making.	<u>including access ways</u> , is not subject to inundation;
16.3.3A.2 Controlled Subdivision – Medium Density Residential Zone – Vacant Allotment in Outline Spatial Plan area	Dam Break Hazard: (40) The management of dam break hazard risk to residential development located downstream of the dam at 75 Seaton Valley Road, Māpua, within the Outline Spatial Plan area – Seaton Valley (Schedule 16.3D.10).	Support with amendments	We support this provision for subdivision in the Seaton Valley Outline Spatial Plan area. Considering this hazard at subdivision stage is important to prevent increased exposure to dam break flooding and to reduce impacts to people and property. We recommend that the provision is clearer about what ‘management’ of dam break hazard risk requires. More specific wording would help ensure that subdivision applications demonstrate how risk has been reduced to an agreed threshold and that any residual risk is understood and manageable.	The following amendment is made: Require subdivision applications to demonstrate that dam break hazard risk is managed to a clearly stated Council-adopted threshold. The assessment could include consideration of building platform location, safe access and egress, evacuation routes, warning time, residual risk, and any potential effects on neighbouring or downstream properties.
16.14 Papakāinga Development				

16.14.2.2 Restricted Discretionary Activities (Residential, Medium Density Residential, Rural 1, Rural 2, Rural 3, or Rural Residential Zones)	Setbacks; Building Envelope: (8) The extent to which the location of buildings in proximity to waterbodies may: (a) increase exposure to natural hazards or impede hazard mitigation.	Support	We support the Council restricting its discretion to consider whether the location of buildings near waterbodies may increase exposure to natural hazards or impede hazard mitigation. Building close to waterbodies can increase exposure to flooding, erosion and other hazards. Including this as a matter of discretion supports risk-informed planning and can help reduce impacts on people and property in natural hazard events.	Retain the provision.
17.1A Medium Density Residential Zone Rules				
17.1A.3.1 Building construction or Alteration. Permitted Activities (Standard Development)	Setbacks: (q) The building is set back at least: (i) 3 metres from the top of the bank of any river with a bed less than 1.5 metres in width; (ii) 8 metres from the top of the bank of any river with a bed between 1.5 metres and 5 metres; (iii) 20 metres from the top of the bank of any river with a bed	Amend	We recommend making it clear in the plan what the purpose of these setbacks are. For example, are they for managing bank erosion, riparian planting margins, or reducing exposure to flood hazard. We support the intent of using setbacks to reduce exposure to hazards associated with rivers. However, setbacks for reducing flood exposure should be informed by flood modelling and the expected flood behaviour of the relevant rivers, rather than relying only on riverbed width. Riverbed width may not accurately reflect flood depth, velocity, erosion risk, floodplain storage, overland flow paths, or the potential effects of climate change. A modelling-based approach would better	The following amendment is made: Clarify the purpose of these setbacks. Where setbacks are for flood exposure management; require building setbacks from rivers to be informed by flood modelling and site-specific hazard information, including the 1% Annual Exceedance Probability flood event, climate change effects, erosion risk, flood flow paths, and effects on neighbouring properties.

	between 5 and 20 metres in width.		support risk-based planning and help ensure that building locations are appropriate for the actual level of hazard.	
17.1A.3.2 Building Construction or Alteration. Restricted Discretionary Activities (Comprehensive Development) Matters of discretion that apply to all proposals	Matters of discretion that apply to all proposals (4) The risks to persons and property from flood hazards and measures to avoid, or mitigate effects, including the matters specified in Section 106A RMA.	Support with amendments	We support flood hazard risk being included as a matter of discretion for comprehensive development. Development can increase the number of people and buildings exposed to hazards and can also influence stormwater, overland flow paths. Tasman District is exposed to a range of natural hazards, and limiting this matter of discretion to flood hazards may not provide sufficient scope to assess and manage other relevant natural hazard risks. Expanding this to include all relevant natural hazards would better support risk-based planning and reduce the impacts of natural hazards on people and property.	The following amendment is made: (4) The risks to persons and property from flood <u>natural</u> hazards and measures to avoid, or mitigate effects, including the matters specified in Section 106A RMA.
17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Matters of discretion that apply when specific conditions are not met Minimum density: For a proposal that does not comply with Condition (b), the following matter of discretion applies:	Support	We support natural hazards being recognised as a factor that may constrain available development area or intensification opportunities. While we don't want to prevent needed development, site-specific constraints must still be considered. Development expectations should not override factors that may make development unsafe, unsuitable, or difficult to manage over the long	Retain the provision.

	(10) Whether there are factors that constrain the available development area or intensification opportunities including: (a) site constraints, including natural hazards, vegetation and streams.		term. Recognising natural hazards as a constraint supports more risk-informed decisions.	
17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Matters of discretion that apply when specific conditions are not met Other setbacks: For a proposal that does not comply with Conditions (r)–(s), the following matter of discretion applies: (34) The extent to which the encroachment into setbacks from waterbodies by buildings will increase the likelihood of damage being caused to the building by erosion, the level of risk to occupants, and the effects of the structure on flood flows.	Support	We support this matter of discretion because it recognises that encroaching into waterbody setbacks can increase the likelihood of damage to buildings, increase risk to occupants, and affect flood flows. Setbacks are a useful tool for reducing exposure to erosion and flood hazards. Considering these matters where setbacks are not met can help reduce impacts on people and property in natural hazard events.	Retain the provision.