

To the Planning Team, Rotorua Lakes Council

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Organisation: Natural Hazards Commission Toka Tū Ake

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Date: 29 August 2025

Thank you for the opportunity to submit on Plan Change 8 – Natural Hazards.

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 objective, NHC's functions, as set out in the NHI Act, include: facilitate research and education; and contribute to the sharing of information, knowledge, and expertise (with the Crown, public and private entities, and the public generally), including in relation to:

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

As NHC is the 'first loss' insurer for residential damage resulting from natural hazards listed in the NHI Act, NHC carries financial risk on behalf of the Crown. We also see the impacts of natural hazards in the insurance claims we receive. This means that NHC has leading insights and a strong interest in reducing risk from, and building resilience to, natural hazards across New Zealand.

Our investments in research and education about natural hazards enable us to use and translate this information to support evidence-based, policy and planning. Our focus is on ensuring long-term resilience by encouraging building in areas that will remain safe and sustainable for future generations. Developing in zones at high risk from natural hazards exposes future owners to complex and potentially hazardous situations, which could compromise the longevity and safety of these developments.

Climate change is also increasing the occurrence and severity of natural hazards covered by the NHC Scheme. Therefore, we support clear, risk-based policy frameworks that reduce natural hazard risks, allow for resilient and sustainable land use planning to manage risk, and support community education and resilience towards natural hazards.

When we make submissions on council strategies and plans, our submissions relate to the suitability of the land proposed for development *without* mitigations. We do not submit on any individual planned or proposed developments. It is up to councils to decide whether the risks to land can be managed, and whether the appropriate mitigations and management strategies are in place for individual consent applications.

Our advice and recommendations are not intended to impede development, but to highlight the importance of careful and precautionary choices to support resilient and sustainable communities in the future. Our goal is to support councils to ask the right questions and make risk-informed decisions.

Therefore, our advice to councils is to consider the risks and impacts on communities the district plan may create for the future. We encourage councils to ensure that they are satisfied that:

- Natural hazard risk has been assessed on a multi-hazard basis, over multiple timeframes, to at least 50, or preferably 100, years into the future, and using multiple climate change scenarios.
- Risks are mitigated to tolerable levels for the community and council. For example, is ‘nuisance flooding’ tolerable if it is ongoing?
- New developments do not create any new or further risks for neighbouring suburbs – now, or in the future.
- There is a plan for managing any residual risks after mitigation.
- ‘Status quo’ of risk and risk tolerance are acceptable where long-term decisions are being made. E.g., an existing community being flood-, liquefaction-, or tsunami-prone is not justification for a new development having the same risks.

We advise councils to engage with private insurers to assess their tolerance for providing insurance to locations, risks, and developments if there is any doubt. Insurability should be a key consideration when thinking about the risks and impacts on communities that are being created for the future.

Rotorua is exposed to a range of natural hazards including earthquakes (ground shaking, fault rupture, and liquefaction), flooding, landslides, wildfire, and geothermal and volcanic activity. Climate change is also expected to bring more frequent and intense rainfall events, which can exacerbate the effects of flooding and other natural hazards like landslides.

NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. Plan Change 8 – Natural Hazards 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, NHC Toka Tū Ake

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

Natural Hazards Commission Toka Tū Ake 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 submission on the following:

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

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 8 – Natural Hazards in its entirety.

5. The submission from NHC is:

NHC supports, is neutral, and opposes Plan Change 8 – Natural Hazards to the extent outlined in this submission.

- a) **Consistent rules and policies** - NHC supports the rules and policies for natural hazard risk management being consistent across the district, including in the Lakes A Zone. A consistent approach supports the reduction of impacts from natural hazard events.
- b) **Natural Hazard Mapping/Overlays** - NHC supports the use of regulatory hazard mapping, in the form of overlays, to spatially identify areas of the district that are prone to natural hazards. NHC requests that these remain as regulatory maps within the District Plan.
- c) **Development in Fault Rupture Hazard Areas** – NHC recommends that rules are updated to reflect a risk-based approach. The current rules set out by Rotorua Lakes Council refer to low importance buildings without providing a definition and allow for habitable buildings in Fault Rupture Hazard Areas. Ministry for the Environment (MfE) has developed guidelines for planning near active faults¹, which should be used to strengthen the approach for managing development near active faults. These guidelines reconcile fault types and building importance categories to ensure a risk-based approach and reduce the impacts to people and property.
- d) **Planning rules for volcanic hazards** – NHC understands that there are no planning rules for volcanic hazards in Rotorua Lakes District because of a lack of hazard and risk information. We recommend that when additional information is made available by Bay of Plenty Regional

¹ [Ministry for the Environment \(2003\). Planning for Development of Land on or Close to Active Faults.](#)

Council Regional Council (as per s32 report), planning rules are included to reduce the impacts to 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 8 – Natural Hazards, including such further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Date: 29/08/2025

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Appendix 1

Provision	Description	Support/ Oppose/ Amend	Reasoning	Requested Action
General	Removing hazard overlays from the District Plan and using information stored in an external GIS viewer.	Oppose	<p>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 raises concerns that if there is not a process established that enables those potentially affected to have a say, the maps could be changed without notifying or consulting with residents as required for a District Plan change.</p> <p>Natural hazard information is subject to ongoing updates, particularly in the context of climate change. While access to the most current data is essential for informed decision-making, it is equally important to ensure that consultation processes are embedded within policy frameworks. This approach upholds principles of natural justice in relation to existing property use rights and supports the provision of scientifically robust and credible information.</p>	Retain hazard maps as regulatory maps with the District Plan.
Definitions				
Acceptable Risk	Risk that is low, and the costs of further reducing risk are largely disproportionate to the benefits gained.	Support	We support providing a definition for ‘acceptable risk’ to ensure a consistent approach to the application of rules and policies. The definition provided by Council outlines their expectations for acceptable risks and will contribute to a risk-based approach.	Retain the provision.

NOT GOVERNMENT POLICY

<p>Fault Rupture Hazard Area</p>	<p>The area around an active fault trace that includes the likely area of fault rupture plus an additional width of at least 20m on either side to allow for secondary ruptures and uncertainty in the location of future deformation.</p>	<p>Support</p>	<p>We support providing a clear definition for ‘Fault Rupture Hazard Areas’ to provide clarity and ensure the consistent application of rules and policies. The definition provided by the Council is consistent with the MfE Guidelines¹ for planning within active fault areas and can be used for risk-based planning.</p> <p>¹Ministry for the Environment (2003). Planning for Development of Land on or Close to Active Faults.</p>	<p>Retain the provision.</p>
<p>Overland Flowpath</p>	<p>The land overflown by a concentrated flow of water in an intense rainfall event, as it flows towards the stormwater network, streams, rivers, or lakes. Overland Flowpath includes a secondary flowpath which is activated when the primary (often piped) stormwater system gets blocked or when the capacity of the piped system is exceeded. For the purposes of this definition, an Overland Flowpath includes, but is not limited to, an artificially designed route using formed or hard surfaces.</p> <p>Overland Flowpaths referred to in rules and performance standards shall be limited to those with a catchment of 4000m² or more.</p>	<p>Support</p>	<p>We support providing a definition for Overland Flowpaths to provide clarity and ensure the consistent application of rules and policies. Overland Flowpaths can be high-risk areas due to increased velocity and depth of flood water in these locations. A clear definition can support avoidance and mitigation of these areas and can reduce the impacts to people and property in flood events.</p>	<p>Retain the provision.</p>
<p>Wildfire</p>	<p>Any natural-caused or unplanned human-caused fire that is burning in and consumes natural fuels: forest, brush, grass, for example.</p>	<p>Support</p>	<p>We support adding a definition for wildfire to provide clarity and ensure the consistent application of rules and policies. Despite the current limitations in assessing wildfire risk in Rotorua, the district has many characteristics that make it vulnerable to wildfire and national projections indicate that with climate change, wildfire risk is increasing across the country^{1,2}. Including a definition and corresponding rules and policies to manage wildfire risk represents a precautionary</p>	<p>Retain the provision.</p>

			<p>approach and can contribute to reducing the impacts to people and property in wildfire events.</p> <p>¹Macara, G., & Sutherland, D. (2024). <i>Wildfire risk in New Zealand, 1997-2023: Prepared for Ministry for the Environment. NIWA Client Report No 2024295WN.</i></p> <p>²Fire and Emergency New Zealand (2023). <i>Climate and Wildfire Risk Evidence Brief – report #205.</i></p>	
Strategic Direction: Natural Hazards and Climate Change Resilience				
SDNH-I1	<p>The Rotorua District is exposed to a range of natural hazards due to its location within the Taupō Volcanic Centre, and its unique geography, geology, and climate. These hazards include flooding, geothermal activity, slope stability hazards, ground condition hazards (including liquefaction and soft, compressible soils), fault rupture and volcanic hazards, such as caldera unrest. These events pose risks to people, property, infrastructure, and the natural environment.</p> <p>Climate change is expected to increase the frequency and severity of some natural hazards, particularly flooding, slope stability and wildfire. Subdivision and land use activities influence the vulnerability and exposure of individuals and communities to these risks. Some areas known to be at high risk have already been intensively developed, resulting in expectations of continued development and increasing the potential consequences of hazard events.</p>	Support	<p>We support outlining the issues that pertain to natural hazard risk management. Specifically, we support the recognition of climate change, residual risk, and the recognition that there may community expectations for continued development in high-risk areas. Identifying these complexities and challenges is useful for developing rules and policies to reduce the impacts to people and property in natural hazard events.</p>	Retain the provision.

NOT GOVERNMENT POLICY

	<p>In some cases, occupation of hazard-prone areas may reflect important cultural values, social or economic values. For example, geothermal areas have traditionally been favoured by Māori for settlement and cultural use. Similarly, lakeside areas that are susceptible to flooding are often valued for recreation, tourism and residential living, contributing to community identity.</p> <p>Effective management of natural hazard risk is often challenged by limitations in available information, including uncertainty around hazard extent, frequency, and potential impacts.</p>			
SDNH-O1	The risks from natural hazards to people, property and the environment associated with land use, subdivision and development are acceptable.	Support	We support requiring the risks to people, property, and the environment to be acceptable. Assessing tolerance to natural hazards is an essential way to support effective management and to reduce the impacts to people and property.	Retain the provision.
SDNH-O2	Land use, subdivision and development are resilient to the current and future effects of climate change.	Support	<p>We support land use, subdivision, and development being resilient to the current and future effects of climate change. Climate change is expected to bring more intense and frequent rainfall events to the Bay of Plenty Region¹, which can exacerbate the effects of flooding and landslides. Climate change also has the potential to affect other natural hazards such as wildfire, meaning it is essential communities can be resilient to climate change.</p> <p>¹Bay of Plenty Regional Council (n.d.). Our future climate.</p>	Retain the provision.
SDNH-P1	When assessing whether the natural hazard risks associated with subdivision or land	Support	We support this policy because it covers key aspects of hazard risk management that can contribute to reducing the impacts to people and property in future natural	Retain the provision.

	<p>use are acceptable, and identifying risks that must be avoided or mitigated:</p> <ol style="list-style-type: none"> 1. Assess the likelihood and potential consequences of natural hazards affecting the land and any potential to exacerbate risks beyond the site. 2. Use the best available information, including relevant national and regional guidance. 3. Take into account: <ol style="list-style-type: none"> a. The predicted effects of climate change, applying a precautionary approach where the extent of the impact is uncertain. b. Cumulative effects over time and across multiple activities. c. Residual risk, including the potential failure of structural hazard defences. d. For developments undertaken by tangata whenua, the cultural significance of the site or activity, which may justify acceptance of a higher level of natural hazard risk. 4. Promote opportunities to reduce existing natural hazard risks affecting established land uses. 		<p>hazard events. Specifically, we support the consideration of cumulative effects, residual risk, and climate change. Although these can provide added complexities and challenges for hazard risk management, they are essential to support the reduction of impacts to people and property.</p>	
SDNH-P2	<p>Strengthen, maintain and protect natural systems and features (such as wetlands and floodplains) that contribute to reducing the risks natural hazards and the effects of climate change.</p>	<p>Support / Amend</p>	<p>We support maintaining natural systems as they can be effective for reducing the impact to people and property in natural hazard events. Natural systems play a vital role in water management, reducing the impacts to people and property in flood events. However, we</p>	<p>The following amendment is made: Strengthen, maintain and protect natural systems and features</p>

			recommend that the wording of the policy is adjusted slightly to provide clarity.	(such as wetlands and floodplains) that contribute to reducing the risks natural hazards risks and the effects of climate change.
Hazards and Risks: Natural Hazards				
NH-PAA Fault Rupture	<p>Manage the risks to people and property associated with fault rupture by requiring an assessment of fault rupture risk and mitigation options for:</p> <ol style="list-style-type: none"> 1. Subdivision to facilitate building on land susceptible to fault rupture. 2. New buildings on land susceptible to fault rupture. 	Support / Amend	<p>We support assessing fault rupture risk and mitigation options for subdivision and new buildings on land susceptible to fault rupture. However, we recommend aligning this policy to the MfE Guidelines for development close to active faults¹. The effects from fault rupture include significant ground movement (often >5m of horizontal movement¹), which would destroy buildings and infrastructure. There is no way of accurately predicting how and where ground deformation will occur in an earthquake, as each earthquake event is unique. Therefore, the risk-based approach from MfE should be applied.</p> <p>¹Ministry for the Environment (2003). Planning for Development of Land on or Close to Active Faults.</p>	<p>The following amendment is made:</p> <p>Manage the risks to people and property associated with fault rupture by requiring an assessment of fault rupture risk and mitigation options <u>in line with the best available guidelines for land use planning near active faults</u>, for:</p> <ol style="list-style-type: none"> 1. Subdivision to facilitate building on land susceptible to fault rupture. 2. New buildings on land susceptible to fault rupture.
NH-PA Flooding	<p>Manage the risks to people, property and the environment associated with development in areas susceptible to flooding by:</p> <ol style="list-style-type: none"> 1. In areas where the anticipated flood depths are low and, therefore, the likely risks to people and property are less, requiring new buildings and larger additions to existing buildings to have floor levels above the flood level for the 1% AEP event 	Support / Amend	<p>We support specifying that consents will be declined if the risk is not shown to be acceptable. Alongside the definition for acceptable risk this is a clear way to reduce the impacts to people and property in natural hazard events. We recommend providing clear definitions for ‘low flood depths’ and when ‘flood depths are higher’. Definitions can provide clarity and ensure the consistent application of rules and policies. Definitions for high and low flood hazard could be considered from Hamilton City Council Plan Change 14¹:</p>	<p>The Council provides definitions for high and low flood hazard.</p>

	<p>with an allowance for climate change and freeboard.</p> <p>2. In areas where anticipated flood depths are higher and, therefore the potential risks to people and property are greater, requiring a flood risk assessment for new buildings and larger additions to existing buildings and their associated site works and declining consent if the flood risks are not shown to be acceptable. The assessment shall correspond to the nature and scale of the anticipated flooding on site and shall include assessment of:</p> <ul style="list-style-type: none"> a. The extent to which the flood risks (including residual risks) on site are managed to an acceptable level; b. Whether the development will increase risks (including residual risks) to other people, property, infrastructure or the environment; c. Safe evacuation routes and refuges; and d. Impacts on Overland Flowpaths and river corridors. 		<ul style="list-style-type: none"> • <i>Low - flooding up to 50cm high, and moving at speeds up to 1m per second. Low does not mean safe.</i> • <i>Medium – flooding between 50cm and 1m high, or moving at speeds between 1m – 2m per second.</i> • <i>High – flooding more than 1m high, or moving faster than 2m per second.</i> <p>1Hamilton City Council (2025). Plan Change 14 – Flooding.</p>	
<p>NH-PB Flooding</p>	<p>Maintain the function of Overland Flowpaths and river corridors to safely convey flood water and reduce risk to life, property and infrastructure by:</p> <p>5. Considering legal protection of Overland Flowpaths at the time of subdivision through methods such as consent notices, easements or vesting of land in Council.</p>	<p>Support</p>	<p>We support maintaining the function of Overland Flowpaths by considering legal protection. Overland Flowpaths represent low points in terrain where surface runoff will flow. Maintaining their function can reduce the impacts to people and property in flood events by ensuring water can flow and preventing buildings and other structures being placed in high-hazard areas. The</p>	<p>Retain the provision.</p>

			option for legal protection is a beneficial addition to the current options for maintaining Overland Flowpaths.	
NH-P2 Land Stability	Require an assessment of slope stability and ground condition hazards (including landslides, liquefaction and soft, compressible soils), associated risks and mitigation options for sites proposed to be subdivided for development. The assessment shall be undertaken by a suitably qualified and experienced person and appropriate to the site’s hazard susceptibility and risks.	Support	We support assessing slope stability and ground conditions for sites proposed to be subdivided. Assessing ground conditions, including any potential for landslides and liquefaction, can support a risk-based planning approach and reduce the impacts to people and property.	Retain the provision.
NH-P5 Wildfire	<p>Mitigate the risks of wildfire associated with development by:</p> <ol style="list-style-type: none"> 1. Requiring firefighting water supply for activities in more densely populated zones and papakāinga to reduce the risk of wildfire occurring. 2. Encouraging subdivision design in rural areas and at the rural-urban fringe to consider the potential risks of wildfire and, where appropriate, include measures that may help reduce the risks. Such measures may include: <ol style="list-style-type: none"> a. identifying suitable locations for building platforms and accessways that reduce exposure to wildfire hazards and facilitate egress; b. facilitating access for emergency services; and c. choice of plant species to reduce the risk of fire. 	Support / Amend	<p>We support adding a policy for wildfire risks. Despite the current limitations in assessing wildfire risk in Rotorua, the district has many characteristics that make it vulnerable to wildfire and national projections indicate that wildfire risk is increasing across the country^{1,2}. This policy to manage wildfire risk represents a precautionary approach and can contribute to reducing the impacts to people and property in wildfire events. However, we suggest that the Council provides a clear threshold for ‘more densely populated areas’ to provide clarity and ensure the consistent application of rules and policies.</p> <p>¹Macara, G., & Sutherland, D. (2024). <i>Wildfire risk in New Zealand, 1997-2023: Prepared for Ministry for the Environment. NIWA Client Report No 2024295WN.</i></p> <p>²Fire and Emergency New Zealand (2023). <i>Climate and Wildfire Risk Evidence Brief – report #205.</i></p>	The Council provides a clear threshold for ‘more densely populated areas’.

<p>NH-R1 Additions to existing buildings or replacement buildings in the Fault Rupture Hazard Area</p>	<p>1. Activity Status: Permitted</p> <p>Performance Standards:</p> <p>a. Replacement buildings within the Fault Rupture Hazard Area shall be within the existing building footprint.</p> <p>2. Activity Status: Restricted Discretionary</p> <p>Where:</p> <p>Compliance is not achieved with the performance standards for NH-R1(1).</p> <p>Matters of Discretion:</p> <p>a. The extent to which natural hazard risks are avoided or remedied and the worsening of any hazard identified.</p> <p>b. In order to assess the risk arising from locating a habitable building within a Fault Rupture Hazard Area, a natural hazard assessment report from a suitably qualified geotechnical engineer shall be provided for new buildings located within the Fault Rupture Hazard Area with this identifying the potential location of the fault line, its recurrence interval and any subsequent building design and location requirements or restrictions on use.</p>	<p>Support</p>	<p>We support that replacement buildings within Fault Rupture Hazard Areas must be within the existing buildings footprint. This approach is in line with the MfE guidelines for planning near active faults¹ and ensures the protection of existing use rights and can support risk reduction by preventing an increase in exposure.</p> <p>¹Ministry for the Environment (2003). Planning for Development of Land on or Close to Active Faults.</p>	<p>Retain the provision.</p>
<p>NH-R2 Low importance buildings in the Fault Rupture Hazard Area</p>	<p>1. Activity Status: Permitted</p>	<p>Amend</p>	<p>We recognise that some activities and buildings or structure types (typically with low levels of vulnerability or not sensitive to natural hazards) can be located within Fault Rupture Hazard Areas. This is in line with the MfE guidelines for planning near active faults¹. However, we suggest providing a clear definition or explanation for what the Council deems as low importance buildings.</p>	<p>Provide a definition for low importance buildings.</p>

			<p>This definition could be adopted from the MfE guidelines. Buildings Importance Category 1: Structures with a total floor area of less than 30m², farm buildings, isolated structures, towers in rural situations, fences, masts, walls, in-ground swimming pools.</p> <p>¹Ministry for the Environment (2003). Planning for Development of Land on or Close to Active Faults.</p>	
NH-R3 New buildings in the Fault Rupture Hazard Area	<p>1. Activity Status: Restricted Discretionary</p> <p>Matters of Discretion:</p> <p>a. The extent to which natural hazard risks are avoided or remedied and worsening of any hazard identified; and</p> <p>b. In order to assess the risk arising from locating a habitable building within a Fault Rupture Hazard Area, a natural hazard assessment report from a suitably qualified geotechnical engineer shall be provided for new buildings located within the Fault Rupture Hazard Area with this identifying the potential location of the fault line, its recurrence interval and any subsequent building design and location requirements or restrictions on use.</p>	Amend	<p>We recommend amending this provision so that it is more aligned to the MfE guidelines for planning near active faults¹. The MfE guidelines specify at which recurrence interval different types of buildings (including habitable buildings) could be located near active faults. The rule should be explicit about when different building types could be in a Fault Rupture Area to support a risk-based approach and ensure the consistent application of rules and policies.</p> <p>¹Ministry for the Environment (2003). Planning for Development of Land on or Close to Active Faults.</p>	<p>The following amendment is made:</p> <p>1. Activity Status: Restricted Discretionary</p> <p>Matters of Discretion:</p> <p>a. The extent to which natural hazard risks are avoided or remedied and worsening of any hazard identified; and</p> <p>b. In order to assess the risk arising from locating a habitable building within a Fault Rupture Hazard Area, a natural hazard assessment report from a suitably qualified geotechnical engineer shall be provided for new buildings located within the Fault Rupture Hazard Area with this identifying the potential location of the fault line, its recurrence interval and any subsequent building design and location requirements or restrictions on use.</p>

				c. <u>Building Importance Categories and Recurrence Intervals (as per MfE guidance) will be used to assess whether a new building will be permitted in a Fault Rupture Hazard Area.</u>
NH-R5 Buildings and Structures in an Overland Flowpath	<p>1. Activity Status: Restricted Discretionary</p> <p>Where:</p> <p>a. The building or structure results in a change to the entry or exit point of an Overland Flowpath on a site, pipes or reduces the capacity of the Overland Flowpath; and</p> <p>b. The activity is not authorised by a stormwater discharge permit granted by the regional council.</p> <p>Matters of Discretion</p> <p>a. The extent to which natural hazard risks are avoided or mitigated and the worsening of any hazard.</p>	Support	We support buildings and structures in Overland Flowpaths being restricted discretionary. Overland Flowpaths represent low areas in terrain where flood waters preferentially flow during floods. Often, they can result in high levels of risk as the depth and velocity of water can be increased. Maintaining and limiting development in Overland Flowpaths is effective to reduce the impact to people and property in flood events.	Retain the provision.
NH-R8 New buildings and additions to building in the Geothermal Systems Overlay	<p>1. Activity Status: Permitted</p> <p>Where:</p> <p>The activity is an addition to an existing building that does not increase the building footprint by more than 20m²</p> <p>4. Activity Status: Restricted Discretionary</p> <p>Where:</p> <p>a. The activity is a new or residential unit or an addition to a residential unit that</p>	Support	We support any additions to buildings being a permitted activity provided it does not increase the building footprint by more than 20m ² . A limited increase to the building footprint is still able to ensure that the risk to people and property is unlikely to be increased to an intolerable level. We also support the matters of discretion considering how risks to people and property on and off the site will be managed, as this can contribute to reducing the impacts to people and property.	Retain the provision.

	<p>increases the building footprint by more than 20m²; and</p> <p>b. No building consent is sought for the activity</p> <p>Matters of Discretion:</p> <p>a. Measures to manage the risks to people and property on and off site from geothermal hazards.</p>			
Natural Environment Values: Natural Character				
NATC-R3 Buildings and infrastructure adjacent to water bodies 7f & 8f	<p>Matters of discretion:</p> <p>The extent to which natural hazard risks are avoided or mitigated and the worsening of any hazard.</p>	Support	We support adding a consideration of natural hazard risk into the matters of discretion. This can contribute to reducing the impacts to people and property in future natural hazard events.	Retain the provisions.
Subdivision				
SUB-I2 Natural and manmade constraints	<p>Site suitability issues for subdivision in Rotorua include:</p> <ol style="list-style-type: none"> 1. High Water tables. 2. Flooding from high lake levels, rivers/streams overflowing, surface water inundation, ephemeral streams and overland flowpaths. 3. Land stability (including landslides, liquefaction and soft, compressible soils) 4. Young, erodible soils 5. Geothermal hazards 6. Potential for wildfire 	Amend	We support outlining specific issues for site suitability including high water tables, flooding, land stability, geothermal hazards, and wildfire. However, for completeness and to ensure consistency across all the rules and policies we recommend also including reference to Fault Rupture. There are a number of active faults within the Rotorua Lakes District, which create site suitability issues for subdivision, and should be recognised.	<p>The following amendment is made:</p> <ol style="list-style-type: none"> 1. High Water tables. 2. Flooding from high lake levels, rivers/streams overflowing, surface water inundation, ephemeral streams and overland flowpaths. 3. Land stability (including landslides, liquefaction and soft, compressible soils) 4. Young, erodible soils 5. Geothermal hazards

				6. Potential for wildfire 7. Fault rupture hazard
SUB-P16	Ensure applications for subdivisions demonstrate that the water supply capacity is sufficient for the development and includes capacity for firefighting purposes in the more densely populated zones.	Support / Amend	We support requiring water capacity to be sufficient for firefighting as this can reduce the impacts to people and property in wildfire events. However, we recommend providing a clear definition for what the Council means for 'more densely populated areas' to provide clarity and ensure a consistent approach to rules and policies.	The Council provides a definition for 'more densely populated areas'.
SUB-S8 Site suitability	3a As part of a subdivision consent application information will be required to establish whether the site is or is likely to be subject to damage through land stability hazards (including landslides, liquefaction and soft, compressible soils). It shall be demonstrated that the site is suitable for subdivision and for the intended future use, and that it will not worsen the effects on other property of any land stability hazard.	Support / Amend	We support consent application information being required to demonstrate that the site is suitable for development. Landslides, liquefaction, and compressible soils can cause significant damage to residential properties. Identifying and avoiding land stability hazards can reduce the impacts to people and property in future hazard events. However, we recommend strengthening this performance standard to refer to relevant guidance for planning in landslide prone ¹ and liquefaction prone areas ² . These guidelines have been developed to support a risk-based approach and to support the identification of suitable sites for subdivision. ¹GNS Science (2024). Landslide planning guidance: Reducing landslide risk through land use planning. ²MBIE & MfE (2017). Planning and engineering guidance for potentially liquefaction-prone land Resource Management Act and Building Act aspects.	The following amendment is made: 3a As part of a subdivision consent application information will be required to establish whether the site is or is likely to be subject to damage through land stability hazards (including landslides, liquefaction and soft, compressible soils). It shall be demonstrated that the site is suitable for subdivision and for the intended future use, and that it will not worsen the effects on other property of any land stability hazard. Site suitability will also be determined using: i. GNS Science (2024). Landslide planning guidance: Reducing landslide risk through land use planning. ii. MBIE & MfE (2017). Planning and engineering guidance for potentially liquefaction-prone

				<u>land Resource Management Act and Building Act aspects.</u>
SUB-MC1 2j, SUB-MD1 2k, SUB-AC1 1n	The extent to which natural hazard risks are avoided or mitigated and the worsening of any hazard.	Support	We support a general matter of control being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of matters of control and/or matters of discretion is a useful way to support the reduction of impacts from natural hazards.	Retain the provisions.
General District Wide Matters: Earthworks				
EW-S1 General earthworks performance standards	1g Residential zones, City Centre Zones, Commercial Zones, Industrial Zones, Business and Innovation Zones: it shall not result in a change to the entry or exit point on a site of an overland flowpath, or the catchment size of an overland flowpath, except where the earthworks are for an activity authorised by a stormwater discharge permit granted by the regional council.	Support	We support ensuring that earthworks will not impact Overland Flowpath entry or exit points or catchment size. Overland Flowpaths represent low areas in terrain where flood waters preferentially flow during floods. Often, they can result in high levels of risk as the depth and velocity of water can be increased. Maintaining Overland Flowpaths by protecting their entry and exit points is effective to reduce the impact to people and property in flood events.	Retain the provision.
General District Wide Matters: Temporary activities				
TEMP-MD3, TEMP-MC2 Natural Hazards	1. The extent to which natural hazards risks are avoided or mitigated and the worsening of any hazard	Support	We support a general matter of control and matter of discretion being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of matters of control and/or discretion is a useful way to support the reduction of impacts from natural hazards.	Retain the provisions.
Area-Specific Matters				
RESZ-MD1 2, RURZ-MC4 1, RURZ-MD1 4, CCZ-MC4 a, CCZ-MD1 b,	The extent to which natural hazards risks are avoided or mitigated and the worsening of any hazard	Support	We support a general matter of control and matter of discretion being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of matters of control and/or	Retain the provisions.

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<p>COMZ-MC2 1, COMZ-MD4 1, INZ-MC3 1, INZ-MD3 1, BIZ-MC3 1, BIZ-MD1 1, CNSZ-MC3 1, CNSZ-MD2 1, DSTZ-MC3 1, DSTZ-MD2 1, CAZ-MC3 3, CAZ-MD2 4, WTRZ-MC3 5, WTRZ-MD2 6</p> <p>Natural Hazards</p>			<p>discretion is a useful way to support the reduction of impacts from natural hazards.</p>	
<p>RESZ-AC1 16, RURZ-AC1 26a, INZ-AC1 14, BIZ-AC1 15, CNSZ-AC1 10, DSTZ-AC1 10, CAZ-AC1 10 10, WTRZ-AC1 10</p> <p>General Assessment criteria</p>	<p>The extent to which natural hazards risks are avoided or mitigated and the worsening of any hazard. The likelihood and consequences of a natural hazard event will be assessed to determine the level of risk associated with natural hazards</p>	<p>Support</p>	<p>We support a general assessment criteria being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of potential conditions is a useful way to support the reduction of impacts from natural hazards. We also support assessing the likelihood and consequence an of event as natural hazard risk is defined as the potential likelihood and consequence of an event. Identifying these components can support a risk-based approach to natural hazard risk management and reduce the impacts to people and property in future events.</p>	<p>Retain the provision.</p>
<p>RURZ-S5A Servicing</p>	<p>A water supply adequate for firefighting purposes shall be provided to the development in accordance with the New</p>	<p>Support</p>	<p>We support requiring an adequate water supply for firefighting purposes. Despite the current limitations in assessing wildfire risk in Rotorua, the district has many</p>	<p>Retain the provision.</p>

	Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509: 2008.		<p>characteristics that make it vulnerable to wildfire and national projections indicate that wildfire risk is increasing across the country^{1,2}. This policy to manage wildfire risk represents a precautionary approach and can contribute to reducing the impacts to people and property in wildfire events. Referencing a specific standard for compliance is also useful to provide clarity and ensure the consistent application of rules and policies.</p> <p>¹Macara, G., & Sutherland, D. (2024). <i>Wildfire risk in New Zealand, 1997-2023: Prepared for Ministry for the Environment. NIWA Client Report No 2024295WN.</i></p> <p>²Fire and Emergency New Zealand (2023). <i>Climate and Wildfire Risk Evidence Brief – report #205.</i></p>	
Lakes A Zone				
S1.1 Significant resource management issues	The Lakes A Zone of the District Plan contains specific provisions to manage the unique and sensitive attributes of the lakes' environment. The provisions of the Lakes A Zone operate independently to the rest of the District Plan, except in relation to Natural Hazards. The Natural Hazards chapter (SDNH) in the Strategic Direction section of Part 1 of the District Plan, and the Natural Hazards chapter (NH) in the Hazards and Risks section of Part 2 of the District Plan also apply to the Lakes A Zone.	Support	We support ensuring that natural hazards are managed consistently across the district. Rotorua Lakes District and the Lakes A Zone are exposed to a range of different natural hazards that can cause impacts to people and property. Rules and policies for hazard risk management should be consistent to support the reduction of impacts to people and property.	Retain the provision.
S1.1.13 Natural Hazards	The lakes environment is exposed to a range of natural hazards due to its location within the Taupō Volcanic Centre, and its unique geography, geology, and climate. These hazards include flooding, geothermal activity, slope stability hazards, ground	Support	We support outlining the issues that pertain to natural hazard risk management. Specifically, we support the recognition of climate change, residual risk, and the recognition that there may community expectations for continued development in high-risk areas. Identifying these complexities and challenges is useful for	Retain the provision.

	<p>condition hazards (including liquefaction and soft, compressible soils), fault rupture and volcanic hazards, such as caldera unrest. These events pose risks to people, property, infrastructure, and the natural environment.</p> <p>Climate change is expected to increase the frequency and severity of some natural hazards, particularly flooding, slope stability and wildfire. Subdivision and land use activities influence the vulnerability and exposure of individuals and communities to these risks. Some areas known to be at high risk have already been intensively developed, resulting in expectations of continued development and increasing the potential consequences of hazard events.</p> <p>In some cases, occupation of hazard-prone areas may reflect important cultural values, social or economic values. For example, geothermal areas have traditionally been favoured by Māori for settlement and cultural use. Similarly, lakeside areas that are susceptible to flooding are often valued for recreation, tourism and residential living, contributing to community identity.</p> <p>Effective management of natural hazard risk is often challenged by limitations in available information, including uncertainty around hazard extent, frequency, and potential impacts.</p>		<p>developing rules and policies to reduce the impacts to people and property in natural hazard events.</p>	
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S3.1 Objectives	Note: The Natural Hazards chapter (SDNH) in the Strategic Direction section of Part 1 of the District Plan, and the Natural Hazards chapter (NH) in the Hazards and Risks section of Part 2 of the District Plan also apply to the Lakes A Zone, in addition to the objectives and policies for the Lakes A Zone.	Support	We support ensuring that natural hazards are managed consistently across the district. Rotorua Lakes District and the Lakes A Zone are exposed to a range of different natural hazards that can cause impacts to people and property. Rules and policies for hazard risk management should be consistent to support the reduction of impacts from natural hazards.	Retain the provision.
A5.1.1 Earthworks	<p>5.1 Activity Status: Permitted</p> <p>Earthworks complying with the following conditions:</p> <p>7 The earthworks shall not result in a change to the entry or exit point on a site of an overland flowpath, or change the catchment size of an overland flowpath, except where the earthworks are for an activity authorised by a stormwater discharge permit granted by the regional council;</p>	Support	We support ensuring that earthworks will not impact Overland Flowpath entry or exit points or catchment size. Overland Flowpaths represent low areas in terrain where flood waters preferentially flow during floods. Often, they can result in high levels of risk as the depth and velocity of water can be increased. Maintaining Overland Flowpaths by protecting their entry and exit points is effective to reduce the impact to people and property in flood events.	Retain the provision.
C5.1.1 Earthworks	<p>5.1 Activity Status: Permitted</p> <p>Earthworks complying with the following conditions:</p> <p>8 Bush Settlement Management Area: the earthworks shall not result in a change to the entry or exit point on a site of an overland flowpath, or change the catchment size of an overland flowpath, except where the earthworks are for an activity authorised by a stormwater discharge permit granted by the regional council;</p>	Support	We support ensuring that earthworks will not impact Overland Flowpath entry or exit points or catchment size. Overland Flowpaths represent low areas in terrain where flood waters preferentially flow during floods. Often, they can result in high levels of risk as the depth and velocity of water can be increased. Maintaining Overland Flowpaths by protecting their entry and exit points is effective to reduce the impact to people and property in flood events.	Retain the provision.

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<p>A6.1.1 Building platforms</p>	<p>6.1 Activity Status: Permitted Building platforms complying with the following conditions: 2. They are outside an ephemeral watercourse or the 2% AEP lake flood level; and</p>	<p>Oppose / Amend</p>	<p>We oppose the complete removal of an AEP specification as part of the conditions for building platforms. Ensuring that building platforms are located outside of the lake flood level is essential to reduce the impacts to people and property. We recommend amending this provision to ensure that building platforms are outside of the 1% AEP lake flood level as per the hazard information held on GeyserView. Planning for at least a 1% AEP event is becoming standard across the country, with many Councils adopting this threshold (e.g. Wellington City Council, Auckland Council, and Whangārei District Council).</p>	<p>The following amendment is made: 2. They are outside an <i>ephemeral watercourse</i> or the 1% AEP lake flood level; and</p>
<p>B6.1.1 Building platforms</p>	<p>6.1 Activity Status: Permitted Building platforms complying with the following conditions: 1. They are outside an ephemeral watercourse or the 2% AEP lake flood level; and</p>	<p>Oppose / Amend</p>	<p>We oppose the complete removal of an AEP specification as part of the conditions for building platforms. Ensuring that building platforms are located outside of the lake flood level is essential to reduce the impacts to people and property. We recommend amending this provision to ensure that building platforms are outside of the 1% AEP lake flood level as per the hazard information held on GeyserView. Planning for at least a 1% AEP event is becoming standard across the country, with many Councils adopting this threshold (e.g. Wellington City Council, Auckland Council, and Whangārei District Council).</p>	<p>The following amendment is made: 2. They are outside an <i>ephemeral watercourse</i> or the 1% AEP lake flood level; and</p>
<p>34.1 Potable water supply</p>	<p>34.1 Activity Status: Permitted Water supply systems complying with the following conditions: 2. Settlement Management Area and Bush Settlement Management Area: Every habitable building shall be provided with a water supply adequate for firefighting purposes with a water supply adequate for firefighting purposes in accordance with</p>	<p>Support</p>	<p>We support requiring an adequate water supply for firefighting purposes. Despite the current limitations in assessing wildfire risk in Rotorua, the district has many characteristics that make it vulnerable to wildfire and national projections indicate that wildfire risk is increasing across the country^{1,2}. This policy to manage wildfire risk represents a precautionary approach and can contribute to reducing the impacts to people and property in wildfire events. Referencing a specific standard for compliance is also useful to provide clarity</p>	<p>Retain the provision.</p>

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	the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509: 2008		and ensure the consistent application of rules and policies. ¹Macara, G., & Sutherland, D. (2024). <i>Wildfire risk in New Zealand, 1997-2023: Prepared for Ministry for the Environment. NIWA Client Report No 2024295WN.</i> ²Fire and Emergency New Zealand (2023). <i>Climate and Wildfire Risk Evidence Brief – report #205.</i>	
Matters of discretion A38.3.1, E38.3.1, RD 38.1.1	The extent to which natural hazard risks are avoided or mitigated and the worsening of any hazard.	Support	We support matters of discretion being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of matters of discretion is a useful way to support the reduction of impacts from natural hazards.	Retain the provisions.