

To: **Combined Wairarapa District Plan Team**

Name of person making further submission: **Sarah-Jayne McCurrach**

This is a further submission in support of (*or* in opposition to) a submission on the following proposed policy statement:

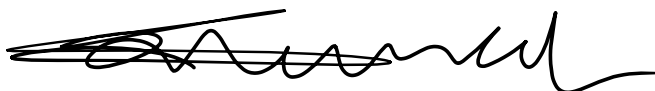
Combined Wairarapa District Plan Review

We are an organisation who has an interest in the proposal that is greater than the interest the general public has.

EQC Toka Tū Ake is a Crown Entity responsible for providing insurance to residential property owners against the impact of natural hazards. We also invest in and facilitate research and education about natural hazards, and methods of reducing or preventing natural hazard damage. The contingent liability associated with natural hazard risk in New Zealand is high and is carried, in large part, by EQC on behalf of the Crown. EQC therefore has a strong interest in reducing risk from, and building resilience to, natural hazards in New Zealand.

Our further submission can be seen in the attached table.

Signature of person making further submission:



Date : **22/04/2024**

Electronic address for service of person making further submission: **resilience@eqc.govt.nz**

Submitter	Submission	Support/ Oppose	Reasons for support/Opposition	Decision sought
Greater Wellington Regional Council	S94.067 Insert Table NH-1 in the definitions chapter OR Amend the definition of Hazard Areas to refer to Table NH-1.	Support	We support adding Table NH-1 to the definitions chapter or amending the definitions chapter to refer to NH-1 in the interests of retaining consistency within the plan and minimising misinterpretation.	I seek the submission be allowed
Greater Wellington Regional Council	S94.071 Add <u>Fault hazard area - well defined and well defined extended FAZs with Recurrence Interval (RI) classes IIV (RI ≤10,000 years)</u> to High Hazard areas in Table NH-1, <u>Fault hazard area - uncertain constrained and distributed FAZs with (RI) class I-II (RI ≤3500 years)</u> to Moderate Hazard Areas in Table NH-1, and <u>All other identified Fault Hazard Areas</u> to Low hazard areas in Table NH-1	Support	As noted in our original submission, EQC support a risk-based approach to fault hazard classification based on MfE and GNS Science 2003 guidance <i>Planning for Development of Land on or Close to Active Faults</i> . Greater Wellington Region Council's submission is aligned with this guidance.	I seek the submission be allowed

Greater Wellington Regional Council	S94.072 Amend NH-O1 as follows: The risk and consequences from natural hazards on people, property, infrastructure, and the environment are <u>reduced or</u> not increased.	Support	We consider it appropriate to encourage reduction of the risk from natural hazards where this is possible.	I seek the submission be allowed
Greater Wellington Regional Council	S94.073 Amend NH-O2 as follows: Natural features, <u>nature-based solutions and hazard mitigation measures</u> are used to reduce the susceptibility of people, communities, property, and infrastructure to damage from natural hazards.	Support	We support the inclusion of nature-based solutions and hazard mitigation measures into this clause, as they both contribute to reducing risks.	I seek the submission be allowed
Greater Wellington Regional Council	S94.097 Amend NH-R4 as follows: c. Any building additions located in the identified overland flowpath or ponding area of the flood hazard overlay have a finished floor level above the 1% AEP	Support	We support a risk-based planning framework for natural hazard risk reduction, which includes avoiding building and building additions in moderate and high hazard areas such as overland flow paths and river corridors. Flooding is a common and often severe natural hazard in New Zealand. During a flood event if	I seek the submission be allowed

	level. <u>d. The additions are not located within a moderate hazard area / overland flow path area.</u> e. The additions are not located within a high hazard area / river corridor.		overland flow paths and river corridors are obstructed, the floodwaters are less able to escape through their natural paths, which can deepen floods and extend their duration, increasing the risk to people and properties.	
Greater Wellington Regional Council	S94.098 Amend NH-R4 as follows: a. Compliance is not achieved with NHR4(1)(a)-(d).	Support	We support GWRC's additions to NH-R4 (see above)	I seek the submission be allowed
Greater Wellington Regional Council	S94.101 Amend NH-R4 as follows: Delete: 3. For additions in the high hazard area, the matters in Policy NH-P2. Add new rule: <u>3.</u> <u>Activity status: Discretionary</u> <u>Where: a. Compliance is not achieved with NHR4(1)(e).</u>	Support	We consider that GWRC's amendment of NH-R4 is clearer and gives more scope to control building and development in higher hazard areas.	I seek the submission be allowed
Greater Wellington Regional Council	S94.109 Amend NH-R7as follows: b. The risk of flooding to people, and	Support	We support including the effects of development on flood risk to surrounding properties in considerations for NH-R7.	I seek the submission be allowed

	the property, <u>and surrounding properties</u> is not increased;		Building and development can increase the flood risk of surrounding properties by displacing flood water and decreasing the drainage potential of land.	
NZ Transport Agency (NZTA)	<p>S149.023</p> <p>S149.056</p> <p>S149.057</p> <p>Amend NH-P3, NH-P4 and NH-P5: ... 3. The risk to other properties, <u>infrastructure including state highways</u>, activities, and people is not increased as a result of the activity proceeding.</p>	Support	<p>We support including the effects of activities on the natural hazard risk to surrounding infrastructure in Natural Hazard Policies 3, 4, and 5.</p> <p>While EQC does not have a direct contingent liability for infrastructure, maintaining functionality of and access to key infrastructure in the wake of a natural hazard event is a key aspect of resilience.</p>	I seek the submission be allowed
NZ Transport Agency (NZTA)	<p>S149.058</p> <p>Amend NH-P6: Discourage new buildings <u>and extensive areas of hard stand</u> in flood hazard - overland flow path and ponding areas unless: 1. There is no increase in <u>stormwater</u></p>	Support	<p>Large areas of hard stand (paved areas to support heavy loads) can exacerbate flood risk by decreasing the amount of permeable ground that is available to drain flood water and can impede the flow of flood waters, increasing both the depth and longevity of the flood. We support restricting areas of hard stand in overland flow paths unless there is demonstrably no increase in flood risk to adjacent sites or roads.</p>	I seek the submission be allowed

	<u>discharge</u> , flood flow or level on adjoining sites, <u>or roads</u> .			
Brookside Developments - Featherston Limited	S95.002 Delete NH-P13 until Flood Alert Areas can be fully justified with robust, evidence-based mapping data.	Oppose	Flood alert areas and flood hazard areas should continue to be updated and mapped at an appropriate scale when improved modelling is available. EQC considers it is good practice to be cautious where detailed modelling is not yet available. NH-P13 is appropriate in discouraging building in areas which are in flood alert areas and may be at risk from flood hazard unless it can be demonstrated that risk to safety is low, the building will not exacerbate flood risk, and the risk to buildings and structures is not significantly increased.	I seek the submission be disallowed
Brookside Developments - Featherston Limited	S95.001 Delete NH-R7 until Flood Alert Areas can be fully justified.	Oppose	Flood alert areas and flood hazard areas should continue to be updated and mapped at an appropriate scale when improved modelling is available. EQC considers it is good practice to be cautious where detailed modelling is not yet available.	I seek the submission be disallowed

			Restricted discretionary status of buildings which contain hazard sensitive activities is appropriate in flood alert areas, as is requiring a supporting flood hazard assessment to further determine the nature of the risk.	
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