



# Wellington City Proposed District Plan – further submission form

Clause 8 of the First Schedule, Resource Management Act 1991.

## How to make a further submission

- email your submission to: **PDPsubmissions@wcc.govt.nz**
- post this form to us (no stamp needed)
- drop your completed form off to Wellington City Council reception, Level 16, 113 The Terrace.

To make sure your further submission can be considered, please lodge by **5pm Friday 2 December 2022**.

## Privacy statement – what we do with your personal information

All submissions (including name and contact details) are published and made available to elected members and to the public from our offices and on our website. Personal information will also be used for the administration of the notified Proposed Plan process.

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at **district.plan@wcc.govt.nz**.

## Certain persons may make further submissions

Under clause 8, Schedule 1 of the RMA the following persons may make a further submission, in the prescribed form, on a proposed plan to the relevant local authority:

- any person representing a relevant aspect of the public interest
- any person that has an interest in the proposed policy statement or plan greater than the interest that the general public has
- the local authority itself.

You will need to explain why you meet one of these categories (space is provided in the form for this below).

## Reasons why a further submission may be struck out

Please note that your further submission (or part of your further submission) may be struck out if the authority is satisfied that at least one of the following applies to the further submission (or part of the further submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## Note to person making the submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority (Wellington City Council).

## Your details

Name: Jo Horrocks	
Postal address (including suburb)	
Phone/mobile	Email: resilience@eqc.govt.nz
I am making this submission: <input type="checkbox"/> as an individual <input checked="" type="checkbox"/> on behalf of an organisation. Organisation's name: Toka Tū Ake EQC	
I would like to be heard in support of my further submission <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If others make a similar submission, I will consider presenting a joint case with them at a hearing. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

## This is a further submission on the Wellington City Proposed District Plan

State whether you are (select appropriate box)

☒ A person who has an interest in the proposal that is greater than the interest the general public has.

*In this case, also please explain the grounds for saying that you come within this category.*

Toka Tū Ake EQC 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 Toka Tū Ake on behalf of the Crown. Toka Tū Ake therefore has a strong interest in reducing risk from, and building resilience to, natural hazards in New Zealand.

☐ The local authority for the relevant area.

*In this case, also please specify the grounds for saying that you come within this category.*

Multiple provisions can be commented on within the following section. Feel free to add more pages to your further submission to provide a fuller response.

I support/oppose the submission of:	The particular part/s of the submission I support/oppose are:			The reasons for my support/ opposition are:	I seek that the whole (or part) of the submission be allowed/ disallowed:
	Sub no./ point no.	Support/ oppose	Provision		
<b>Submission 383</b> <b>Argosy Property No. 1 Ltd.</b> <b>Bianca Tree/Amy Dresser</b> <b>bianca.tree@minterellison.co.nz</b> <b>amy.dresser@minterellison.co.nz</b>					
Delete "Natural Hazard Overlay" table in Introduction.	383.19	Oppose	General NH	- High, medium and low risk ranking is important in assessing the level of activity appropriate in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed
Add:Enable subdivision, development and use associated within the City Centre Zone and within all of the Natural Hazard Overlays, where they do not involve the construction of new buildings which will be occupied by members of the public or the creation of vacant allotments	383.21	Oppose	General NH	- Some areas within natural hazard overlays are not appropriate for development and the NH provisions in the plan are reflective of this	I seek that the whole of this submission be disallowed
Amend: Tsunami – 1:100 year scenario inundation extent = <del>High</del> <u>Medium</u>	383.74	Oppose	General CE	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunamis are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). It is not appropriate to reduce the hazard ranking to medium.	I seek that the whole of this submission be disallowed
Opposes Policy CE-P12.1. which enables only low occupancy, risk or replacement value development within the Coastal Hazard Overlays. Policy CE-12.2 should apply to the Coastal Hazard Inundation Overlay only. It is not appropriate to require mitigation for tsunami risk based on the likelihood of an event occurring, and the inability to mitigate this type of event. Further, it is unrealistic to provide that mitigation can address the impacts from coastal hazards, rather than to reduce or not increase the risk	383.78	Oppose	CE-P12	- Coastal hazard risk is going to increase in the near future with the impact of climate change and sea level rise, and high occupancy developments in high risk areas will expose more people to increasing risk. Additionally, mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy.	I seek that the whole of this submission be disallowed
Additions to buildings for potentially hazard sensitive activities and hazard sensitive activities should be enabled within the medium coastal hazard area and high	383.80	Oppose	CE-P14	- Mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. Tsunami are not a 'remote' risk. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years <sup>2</sup> .	I seek that the part of this submission regarding hazard overlays be disallowed

<sup>1</sup> Lukovic B, Heron DW, Wang X, Power WL. 2017. Evacuation time estimates for local source tsunamis for Wellington suburbs. Lower Hutt (NZ): GNS Science. 159 p. (GNS Science Report; 2017/05). doi:10.21420/G2FW2V

<sup>2</sup> <https://www.eastcoastlab.org.nz/our-science/our-projects/hikurangi-subduction-earthquakes-and-slip-behavior-research-project/article/216/1-in-4-chance-of-a-magnitude-8-or-greater-earthquake-in-the-next-50-years-scientists-uncover-crucial-knowledge-about-our-largest-and-most-active-fault?t=featured&s=3>

coastal hazard area where the risk can be mitigated. However, it is difficult to provide mitigation measures in relation to tsunami risk, because of the remoteness of tsunami risk				A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes.	
Requests that potentially hazard sensitive activities incorporate coastal hazard mitigation measures OR tsunami evacuation routes, rather than both, because it is difficult to provide mitigation measures in relation to tsunami risk	383.82	Oppose	CE-P16	- Mitigation of risks from tsunami and other coastal hazards are possible with land use planning and building design, and land use planning may be required to ensure that tsunami evacuation routes are secured. It is therefore appropriate to require measures that reduce or do not increase risk from activities within medium coastal hazard areas, as well as requiring safe tsunami evacuation routes.	I seek that the whole of this submission be disallowed
Allow hazard sensitive activities within the high coastal hazard overlay with the same provisions as those for hazard sensitive activities in the medium coastal hazard overlay.	383.84	Oppose	CE-P17	- It is not appropriate to allow hazard-sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the high coastal hazard area, not only due to the current risk but because that risk will increase in the near future due to the effects of climate change	I seek that the whole of this submission be disallowed
Allow hazard sensitive activities within the high coastal hazard overlay with the same provisions as those for hazard sensitive activities in the medium coastal hazard overlay.	383.85	Oppose	CE-P18	- It is not appropriate to allow hazard-sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the high coastal hazard area, not only due to the current risk but because that risk will increase in the near future due to the effects of climate change	I seek that the whole of this submission be disallowed
It is not appropriate to place controls on buildings in the Tsunami Hazard Overlay. Due to the nature of tsunamis, it is not realistic to construct additions to buildings to avoid tsunami risk.	383.88	Oppose	CE-R18	- Mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. Additions to buildings (e.g. for vertical evacuation purposes) should be encouraged to allow people to safely evacuate.	I seek that the whole of this submission be disallowed
<b>Submission 425</b> <b>Fabric Property Ltd.</b> <b>Bianca Tree/Amy Dresser</b> <b>bianca.tree@minterellison.co.nz</b> <b>amy.dresser@minterellison.co.nz</b>	Sub no./ point no.	Support/ oppose	Provision		
Seeks that the introduction to the Natural Hazards chapter is amended to delete the hazard rankings from the table.	425.9	Oppose	General NH	- High, medium and low risk ranking is important in assessing the level of activity appropriate in areas at risk from natural hazards. Deleting the rankings will undermine the risk-based approach that has been taken.	I seek that the whole of this submission be disallowed
If the hazards ranking table is not deleted from the Natural Hazards chapter introduction, amend the Natural Hazards chapter introduction to remove the 'High' hazard ranking for the Liquefaction Hazard Overlay.	425.10	Oppose	General NH	- Liquefaction is a hazard associated with earthquakes. Much of central Wellington is built on ground likely to liquefy in an earthquake, and the risk of earthquakes in Wellington is high. Liquefaction is a real risk that has already been experienced in Wellington (e.g. during the 2016 Kaikoura earthquake), and ignoring the liquefaction risk in Christchurch resulted in catastrophic damage and retirement of land. MBIE guidelines for development in areas at risk from liquefaction <sup>3</sup> recommend both land use planning to avoid more vulnerable activities in high risk areas and requiring liquefaction resistant foundations for those buildings which are appropriate to develop in medium and high risk areas.	I seek that the whole of this submission be disallowed
Amend NH-P2: <del>1. Allowing for those buildings and activities that have either low occupancy or low replacement value within the low, medium and high hazard areas of the Natural Hazard Overlays;</del> <u>1. 2- Requiring buildings and activities to reduce or not increase mitigate the impacts from natural hazards to people, property and infrastructure in the low, and medium and high hazard areas within the Natural Hazard Overlays;</u> <u>2. 3. Avoiding buildings and activities in the high hazard areas of the Natural Fault Hazard Overlays unless there is a functional or operational or exceptional reason for the building or activity to be located in this area and the</u>	425.13	Oppose	NH-P2	- The WCC proposed district plan liquefaction hazard overlay is based on the high and very high liquefaction zones shown in the GWRC liquefaction hazard maps, and it is appropriate to require low occupancy development and mitigation of the impact of natural hazards in this area and within all other Natural Hazard Overlays. Liquefaction is a real risk that has already been experienced in Wellington (e.g. during the 2016 Kaikoura earthquake), and ignoring the liquefaction risk in Christchurch resulted in catastrophic damage and retirement of land. MBIE guidelines for development in areas at risk from liquefaction <sup>1</sup> recommend both land use planning to avoid more vulnerable activities in high risk areas, and requiring liquefaction resistant foundations for those buildings which are appropriate to develop in medium and high risk areas.	I seek that the whole of this submission be disallowed

<sup>3</sup> <https://www.building.govt.nz/assets/Uploads/building-code-compliance/b-stability/b1-structure/planning-engineering-liquefaction.pdf>

activity mitigates the impacts from natural hazards to people, property and infrastructure.					
Amend the Coastal Hazard Overlay Hazard Ranking table as follows: Tsunami – 1:100 year scenario inundation extent = <del>High</del> <u>Medium</u>	425.32	Oppose	General CE	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>4</sup> . It is not appropriate to reduce the hazard ranking to medium. Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction).	I seek that the whole of this submission be disallowed
Opposes Policy CE-P12.1. which enables only low occupancy, risk or replacement value development within the Coastal Hazard Overlays. Policy CE-12.2 should apply to the Coastal Hazard Inundation Overlay only. It is not appropriate to require mitigation for tsunami risk based on the likelihood of an event occurring, and the inability to mitigate this type of event. Further, it is unrealistic to provide that mitigation can address the impacts from coastal hazards, rather than to reduce or not increase the risk	425.37	Oppose	CE-P12	- Coastal hazard risk is going to increase in the near future with the impact of climate change and sea level rise, and high occupancy developments in high risk areas will expose more people to increasing risk. Additionally, mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. GNS guidelines for integrating tsunami modelling into land use planning supports a risk-based approach to avoid, mitigate, or reduce tsunami risk <sup>4</sup> .	I seek that the whole of this submission be disallowed
Enable additions within the Tsunami Hazard Overlay to be permitted, to recognise that it is not realistic to construct additions to buildings to avoid tsunami risk	425.46	Oppose	CE-R18	- Mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. Additions to buildings (e.g. for vertical evacuation purposes) should be encouraged to allow people to safely evacuate.	I seek that the whole of this submission be disallowed
Amend CE-R20 (Potentially hazard sensitive activities or hazard sensitive activities within the City Centre Zone): Activity status: Permitted Where: 1. It does not involve the construction of a building that would be occupied <del>predominantly by more than 10 employees of the activity, or any members of the public;</del> or 2. It does not involve the conversion of an existing building into a building that would be occupied <del>predominantly by more than 10 employees of the activity, or any members of the public.</del>	425.48	Oppose	CE-R20	- Coastal hazard risk is going to increase in the near future with the impact of climate change and sea level rise, and high occupancy developments in high risk areas will expose more people to increasing risk	I seek that the whole of this submission be disallowed

<b>Submission 351</b> <b>Greater Wellington Regional Council</b> <b>Mika Zollner</b> <b>mika.zollner@gw.govt.nz</b>	Sub no./ point no.	Support/ oppose	Provision		
Seeks that WCC continues to work with Greater Wellington to discuss the City's flood hazards in relation to the proposed intensification.	351.27	Support	General Mapping	- We support natural hazard overlays based on current and accurate research. Continued collaboration between agencies is important to keep hazard information up to date and consistent across the region.	I seek that the whole of this submission be allowed
Seeks that WCC continues to work with Greater Wellington to discuss the City's flood hazards in relation to the proposed intensification.	351.28	Support	General Mapping	- We support natural hazard overlays based on current and accurate research. Continued collaboration between agencies is important to keep hazard information up to date and consistent across the region.	I seek that the whole of this submission be allowed
Seeks to Include identified overlays in the Rural Zone, based on the regional flood hazard mapping provided: Regional Exposure Assessment 1% AEP RCP8.5 2101-2120 (arcgis.com)	351.30	Support	General Mapping	- Natural hazard overlays are important in rural areas as well as urban and residential zones. Rural communities can be severely affected by flooding and this information is important for land use planning and public information.	I seek that the whole of this submission be allowed
Seeks that WCC continues to work with Greater Wellington to discuss the City's flood hazards in relation to the proposed intensification	351.118	Support	General NH	- We support natural hazard provisions based on current and accurate research. Continued collaboration between agencies is important to keep hazard information up to date and consistent across the region.	I seek that the whole of this submission be allowed

<sup>4</sup> Beban J, Gunnell S, Saunders WSA. 2019. Integrated tsunami inundation modelling into risk-based land-use planning: an update of guidance. Lower Hutt (NZ): GNS Science. 47 p. (GNS Science miscellaneous series 132). doi:10.21420/6MGN-4T72

Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.119	Support	NH-O1	- We consider it appropriate for terminology consistent with GRWC proposed RPS Change 1, based on standard risk based hazard management approaches, to be used throughout the WCC proposed district plan. We agree that ‘minimise’ natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably practical than ‘reduce’ and ‘reduce or do not increase’.	I seek that the whole of this submission be allowed
Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.121	Support	NH-O2	- We consider it appropriate for terminology consistent with GRWC proposed RPS Change 1, based on standard risk based hazard management approaches, to be used throughout the WCC proposed district plan. We agree that ‘minimise’ natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably practical than ‘reduce’ and ‘reduce or do not increase’.	I seek that the whole of this submission be allowed
Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.125	Support	NH-P2	- We consider it appropriate for terminology consistent with GRWC proposed RPS Change 1, based on standard risk based hazard management approaches, to be used throughout the WCC proposed district plan. We agree that ‘minimise’ natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably practical than ‘reduce’ and ‘reduce or do not increase’	I seek that the whole of this submission be allowed
Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.129	Support	NH-P6	- We consider it appropriate for terminology consistent with GRWC proposed RPS Change 1, based on standard risk based hazard management approaches, to be used throughout the WCC proposed district plan. We agree that ‘minimise’ natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably practical than ‘reduce’ and ‘reduce or do not increase’	I seek that the whole of this submission be allowed
Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.130	Support	NH-P7	- We consider it appropriate for terminology consistent with GRWC proposed RPS Change 1, based on standard risk based hazard management approaches, to be used throughout the WCC proposed district plan. We agree that ‘minimise’ natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably practical than ‘reduce’ and ‘reduce or do not increase’	I seek that the whole of this submission be allowed
Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.131	Support	NH-P8	- We consider it appropriate for terminology consistent with GRWC proposed RPS Change 1, based on standard risk based hazard management approaches, to be used throughout the WCC proposed district plan. We agree that ‘minimise’ natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably practical than ‘reduce’ and ‘reduce or do not increase’	I seek that the whole of this submission be allowed
Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.132	Support	NH-P9	- We support requiring a qualified geotechnical engineer to certify foundation designs for emergency facilities within the liquefaction hazard overlay, to increase resilience of the building and maintain post-event functionality.	I seek that the whole of this submission be allowed
Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.133	Support	NH-P10	- We consider it appropriate for terminology consistent with GRWC proposed RPS Change 1, based on standard risk based hazard management approaches, to be used throughout the WCC proposed district plan. We agree that ‘minimise’ natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably practical than ‘reduce’ and ‘reduce or do not increase’	I seek that the whole of this submission be allowed
Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.134	Support	NH-P11	- We consider it appropriate for terminology consistent with GRWC proposed RPS Change 1, based on standard risk based hazard management approaches, to be used throughout the WCC proposed district plan. We agree that ‘minimise’ natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably practical than ‘reduce’ and ‘reduce or do not increase’	I seek that the whole of this submission be allowed
Replace “reduces or does not increase” with “minimise” in reference to Natural Hazard mitigation	351.135	Support	NH-P12	- We consider it appropriate for terminology consistent with GRWC proposed RPS Change 1, based on standard risk based hazard management approaches, to be used throughout the WCC proposed district plan. We agree that ‘minimise’ natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably	I seek that the whole of this submission be allowed



				throughout the WCC proposed district plan. We agree that 'minimise' natural hazard risk is a clearer instruction to bring risk in development to levels as low as reasonably practical than 'reduce' and 'reduce or do not increase'	
<b>Submission 405</b> <b>Investore Property Ltd.</b> <b>Amy Dresser/Bianca Tree</b> <b>amy.dresser@minterellison.co.nz</b> <b>bianca.tree@minterellison.co.nz</b>	<i>Sub no./ point no.</i>	<i>Support/ oppose</i>	<i>Provision</i>		
Amend NH-R11.2 (Hazard sensitive activities in the inundation area of the Flood Hazard Overlay) as follows:2. Activity Status: <del>Non-Complying</del> <u>Discretionary</u> Where Compliance with the requirements of NH-R11.1.a cannot be achieved.	405.33	Oppose	NH-R11	- Hazard sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the inundation area of the flood hazard zone should remain non-compliant when the floor level required for restricted discretionary status is not met. Amending this to discretionary provides a path for development which puts more people and property at risk from flood hazard.	I seek that the whole of this submission be disallowed
Amend NH-R12.2 (Potentially hazard sensitive activities in the inundation area of the Flood Hazard Overlay) as follows:2. Activity Status: <del>Non-Complying</del> <u>Discretionary</u> Where Compliance with the requirements of NH-R12.1.a cannot be achieved.	405.35	Oppose	NH-R11	- Potentially hazard sensitive activities, which include commercial activities, offices, and retail activities, within the inundation area of the flood hazard zone should remain non-compliant when the floor level required for restricted discretionary status is not met. Amending this to discretionary provides a path for development which puts more people and property at risk from flood hazard.	I seek that the whole of this submission be disallowed
Enable additions within the Tsunami Hazard Overlay to be permitted, to recognise that it is not realistic to construct additions to buildings to avoid tsunami risk.	405.45	Oppose	CE-R18	- A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. Mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. Additions to buildings (e.g. for vertical evacuation purposes) should be encouraged to allow people to safely evacuate.	I seek that the whole of this submission be disallowed
<b>Submission 391</b> <b>Kāinga Ora Homes and Communities</b> <b>Gurv Singh</b> <b>gurv.singh@kaingaora.govt.nz</b>	<i>Sub no./ point no.</i>	<i>Support/ oppose</i>	<i>Provision</i>		
Remove the Flood Hazard overlay from planning maps.	391.19	Oppose	General Mapping	- Accurate and risk-based regulatory hazard maps are an important tool in the WCC Proposed District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.	I seek that the whole of this submission be disallowed
Seeks that data from the Flood Hazard overlay is included in non-statutory GIS maps that are publicly available.	391.20	Oppose	General Mapping	- Removing the regulatory nature of flood hazard maps reduces the ability of the plan to spatially limit inappropriate development in areas at risk from flood hazard, and allows for inconsistent application of rules to minimize flood hazard risk.	I seek that the whole of this submission be disallowed
Delete the Natural Hazard Overlay from the District Plan and instead hold this information in non-statutory GIS maps.	391.30	Oppose	Flood Hazard Overlay	- Accurate and risk-based regulatory hazard maps are an important tool in the WCC Proposed District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.	I seek that the whole of this submission be disallowed
Considers that references to "Natural Hazard Overlays" should be removed and replaced by a newly defined term 'Natural Hazard Areas'. Natural Hazard Overlays should instead be included as non-statutory, information-only mapping layer that sits outside the Proposed District Plan.	391.31	Oppose	Definitions	- MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlying zone". As this is the purpose of the WCC proposed plan's Natural Hazard Overlays, the term should be retained. Regulatory natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.	I seek that the whole of this submission be disallowed
Amend the definition of 'Natural Hazard Overlays' as follows: NATURAL HAZARD OVERLAYS AREA means the combined mapped extent within the District Plan of the following natural hazards: <del>a. Flood Hazards b. Liquefaction Hazards c. Fault</del>	391.37	Oppose	Definitions	- MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlying zone". As this is the purpose of the WCC proposed plan's Natural Hazard Overlays, the term should be retained. Regulatory	I seek that the whole of this submission be disallowed

<p><i>Hazards</i></p> <p><u>And the Council's publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information</u></p>				<p>natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.</p>	
<p>Amend Objective CC-O2 as follows: Wellington City is a well-functioning Capital City where:...4.Urban intensification is delivered in appropriate locations and in a manner that meets the needs of current and future generations.</p>	391.49	Oppose	CC-O2	<p>- Urban development and intensification in inappropriate locations could reduce the resilience of a community from natural hazards and the effects of climate change, and reduces the livability and sustainability of cities in the long term. It is important that the WCC proposed plan specifies that urban intensification occur only in appropriate areas.</p>	I seek that the whole of this submission be disallowed
<p>Considers that the Three Waters chapter should be amended so that references to 'Natural Hazard Overlays' are replaced with 'Natural Hazard area'.</p>	391.93	Oppose	General THW	<p>- MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlaying zone". As this is the purpose of the WCC proposed plan's Natural Hazard Overlays, the term should be retained. Regulatory natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.</p>	I seek that the whole of this submission be disallowed
<p>Amend the Natural Hazards chapter so that rules do not refer to static maps.</p>	391.155	Oppose	General NH	<p>- Accurate and risk-based regulatory hazard maps are an important tool in the WCC Proposed District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.</p>	I seek that the whole of this submission be disallowed
<p>Seeks that natural hazard flooding overlays from the District Plan are deleted and that the information be held in non-statutory GIS maps instead.</p>	391.156	Oppose	General NH	<p>- Accurate and risk-based regulatory hazard maps are an important tool in the WCC Proposed District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.</p>	I seek that the whole of this submission be disallowed
<p>Delete all references to "Natural Hazard Overlays" and refer to the newly defined term of Natural Hazard Areas instead.</p>	391.157	Oppose	General NH	<p>- MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlaying zone". As this is the purpose of the WCC proposed plan's Natural Hazard Overlays, the term should be retained. Regulatory natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.</p>	I seek that the whole of this submission be disallowed
<p>Considers that NH-R12 should be amended to have a permitted activity pathway. Identified flooding inundation areas carry the lowest risk of natural hazard potential and are more than capable of being mitigated. Therefore it is considered that a permitted activity pathway should be available for development that achieves the 1% Flood Annual Exceedance Probability level, including allowance for freeboard</p>	391.159	Oppose	NH-R11	<p>- It is not appropriate for hazard sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the flood inundation hazard overlay to have permitted status. Flooding is the most common natural hazard faced in Aotearoa, and repeated flooding events can have severe effects on properties and the wellbeing of residents. As the depth of expected flood inundation and thus risk varies within the overlay, restricted discretionary status allows for restriction of development within higher risk areas of the overlay. As discussed elsewhere, regulatory hazard overlays for flooding should remain in the district plan.</p>	I seek that the whole of this submission be disallowed
<p>Amend NH-R11.2 (Hazard sensitive activities in the inundation area of the Flood Hazard Overlay) as follows:Activity Status: <del>Non-Complying</del> <u>Restricted Discretionary</u> where compliance with the requirements of NH-R11.1.a (freeboard requirements) cannot be achieved.</p>	391.160	Oppose	NH-R11	<p>- Hazard sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the inundation area of the flood hazard zone should remain non-compliant when the floor level required for restricted discretionary status is not met. Amending this to discretionary provides a path for development which puts more people at risk from flood hazard.</p>	I seek that the whole of this submission be disallowed
<p>Amend NH-R12.2 (Potentially hazard sensitive activities in the overland flowpath</p>	391.162	Oppose	NH-R12	<p>- Hazard sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and</p>	I seek that the whole of this submission be



of the Flood Hazard Overlay) as follows: Activity Status: <del>Non-Complying</del> <u>Discretionary</u> where compliance with the requirements of NH-R12.1.a (freeboard requirements) cannot be achieved				childcare, within the overland flowpath area of the flood hazard overlay should remain non-compliant when freeboard levels are not met. Unimpeded overland flowpaths are important in allowing floodwater to escape and recede. Amending this to discretionary provides a path for development which puts more people at risk from flood hazard and may worsen the effects of flooding in the surrounding area.	disallowed
Seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	391.229	Oppose	SUB-R17	- Accurate and risk-based regulatory hazard maps are an important tool in the WCC Proposed District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.	I seek that the part of this submission regarding the flood hazard overlay be disallowed
Seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	391.231	Oppose	SUB-R18	- Accurate and risk-based regulatory hazard maps are an important tool in the WCC Proposed District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.	I seek that the part of this submission regarding the flood hazard overlay be disallowed
Seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	391.233	Oppose	SUB-R19	- Accurate and risk-based regulatory hazard maps are an important tool in the WCC Proposed District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.	I seek that the part of this submission regarding the flood hazard overlay be disallowed
Amend SUB-R21 (Subdivision that creates building platforms for potentially hazard sensitive activities within the stream corridor of the Flood Hazard Overlay or the high hazard area of the Coastal Hazard Overlays) as follows: Subdivision that creates building platforms for potentially hazard sensitive activities within the stream corridor of the Flood Hazard Overlay or the high hazard area of the Coastal Hazard Overlays 1. Activity Status: <del>Non-Complying</del> <u>Discretionary</u>	391.235	Oppose	SUB-R21	- Hazard sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the stream corridor of the flood hazard overlay and high coastal hazard overlay should remain non-compliant. Unimpeded stream corridors are important in allowing floodwater to escape and recede. Additionally, coastal hazard risk is going to increase in the near future with the impact of climate change and sea level rise. Amending this to discretionary provides a path for development which puts more people at risk from flood hazard and may worsen the effects of flooding in the surrounding area, and expose more people to increasing coastal hazard risk.	I seek that the parts of this submission regarding the flood hazard overlay and coastal hazard overlay be disallowed
Seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	391.239	Oppose	SUB-R23	- Accurate and risk-based regulatory hazard maps are an important tool in the WCC Proposed District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.	I seek that the part of this submission regarding the flood hazard overlay be disallowed
Seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	391.241	Oppose	SUB-R24	- Accurate and risk-based regulatory hazard maps are an important tool in the WCC Proposed District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.	I seek that the whole of this submission be disallowed
Amend SUB-R25 (Subdivision that creates building platforms for hazard sensitive activities within the stream corridor of the Flood Hazard Overlay, the Wellington Fault Overlay, the Ohariu Fault Overlay or the high hazard area of the Coastal Hazard Overlays) as follows: Subdivision that creates building platforms for hazard sensitive activities within the	391.243	Oppose	SUB-R25	- Hazard sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the stream corridor of the flood hazard overlay, high coastal hazard overlay, and the Wellington and Ohariu Fault overlays should remain non-compliant for the following reasons: - Unimpeded stream corridors are important in allowing floodwater to escape and recede. - coastal hazard risk is going to increase in the	I seek that the whole of this submission be disallowed

stream corridor of the Flood Hazard Overlay, the Wellington Fault Overlay, the Ohariu Fault Overlay or the high hazard area of the Coastal Hazard Overlays 1.Activity Status: <del>Non-Complying</del> <u>Discretionary</u>				<p>near future with the impact of climate change and sea level rise, and</p> <ul style="list-style-type: none"> <li>- Rupture of the Wellington or Ohariu fault is the natural hazard which will create the most devastating impact on Wellington City. While ground shaking can't be 'planned' for (but built for), the amount of damage can be reduced by not locating buildings on the faults. Therefore the fault overlays need to be retained to avoid building on the faults.</li> </ul> <p>Amending hazard sensitive activities in these overlays to discretionary provides a path for development which puts more people at risk from flood hazard and may worsen the effects of flooding in the surrounding area, exposes more people and properties to increasing coastal hazard risk, and exposes more people and properties to fault rupture. This is unacceptable even within already developed suburbs.</p>	
Amend CE-P12 (Levels of risk) as follows: New subdivision, use and development <del>reduces</del> <u>does not increase</u> the risk to people, property, and infrastructure by: 1.Enable subdivision, use and development that have either low occupancy, risk, or replacement value within the Coastal Hazard Overlays; 2.Requiring mitigation for subdivision, use and development that addresses the impacts from the relevant coastal hazards to people, property, and infrastructure in the low and medium hazard areas; <del>and</del> <del>3.Avoiding subdivision, use and development in the high hazard area unless there is an functional and operational need for the building or activity to be located in this area and incorporates mitigation measures are incorporated that reduces the risk to people, property, and infrastructure.</del>	391.252	Oppose	CE-P12	- The category of high hazard area is afforded to those areas where the level of risk from natural hazard is such that mitigation is not sufficient to bring risk to a tolerable level. Many natural hazard risks are going to increase in the near future with the impact of climate change and sea level rise, and high occupancy developments in high risk areas will expose more people to increasing risk. As such avoidance of subdivision and development in these areas is appropriate, and risks should be reduced where possible, rather than keeping the status quote i.e. not increasing risks.	I seek that the whole of this submission be disallowed
Considers that CE-P18 should be amended to enable the potential for Hazard Sensitive Activities and Potentially Hazard Sensitive Activities in the High Coastal Hazard Area to be provided in some circumstances where the risks can be managed through mitigation measures.	391.258	Oppose	CE-P18	- The category of high coastal hazard area is afforded to those areas where the level of risk from coastal hazard is such that mitigation is not sufficient to bring risk to a tolerable level. As such avoidance of subdivision and development in these areas is appropriate even within an existing urban area. Coastal hazard risk is going to increase in the near future with the impact of climate change and sea level rise, and high occupancy developments in high risk areas will expose more people to increasing risk	I seek that the whole of this submission be disallowed
Considers that CE-R27 should be amended to change the activity status of Hazard Sensitive Activities within the High Coastal Hazard Area from Non-Complying to Discretionary to enable the potential for these activities to be provided where the risks can be managed through mitigation measures.	391.268	Oppose	CE-R27	- Hazard sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within high coastal hazard overlay should remain non-compliant. Coastal hazard risk is going to increase in the near future with the impact of climate change and sea level rise. Amending this to discretionary provides a path for development which puts more people at risk from increasing coastal hazard risk.	I seek that the whole of this submission be disallowed
<b>Submission 404 Oyster Management Ltd.</b> <b>Amy Dresser/Bianca Tree</b> <b>amy.dresser@minterellison.co.nz</b> <b>bianca.tree@minterellison.co.nz</b>	Sub no./ point no.	Support/ oppose	Provision		
Amend NH-P6 (Potentially hazard sensitive activities and hazard sensitive activities within the identified inundation areas of the Flood Hazard Overlays) to: Provide <u>for</u> subdivision, development and use for potentially hazard sensitive activities and hazard sensitive activities within the inundation area provided that mitigation measures are incorporated to ensure <del>the</del> <u>that significant</u> risk to people and property both on the site and on adjacent properties is not increased or is reduced.	404.18	Oppose	NH-P6	- The submission does not make it clear what constitutes a "significant risk", and the level of risk deemed significant may vary between communities. While the level of risk may vary within the flood inundation overlay, it is appropriate to require mitigation measures for hazard sensitive and potentially hazard sensitive activities throughout the zone. Any risk (not just significant risk) to people and property on the site and adjacent properties should be reduced or not increased.	I seek that the whole of this submission be disallowed
Amend NH-P7 (Potentially hazard sensitive	404.21	Oppose	NH-P7	- The submission does not make it clear what constitutes a	I seek that the whole of

activities and hazard sensitive activities within the overland flowpaths of the Flood Hazard Overlay) as follows: Incorporating mitigation measures that reduce or avoid an increase in <u>significant</u> risk to people and property from the 1% Annual Exceedance Probability flood;				“significant risk”, and the level of risk deemed significant may vary between communities. Unimpeded overland flowpaths are important in allowing floodwater to escape and recede, and development within them should be restricted. Any risk (not just significant risk) to people and property on the site and adjacent properties should be reduced or not increased.	this submission be disallowed
Amend NH-R12 (Potentially hazard sensitive activities in the overland flowpath of the Flood Hazard Overlay) to: 2. Activity status: <del>Non-complying</del> <u>Discretionary</u> where compliance with the requirements of NH-R12.1.a (freeboard requirements) cannot be achieved	404.27	Oppose	NH-R12	- Potentially hazard sensitive activities, which include commercial activities, offices, and retail activities, within the overland flowpath area of the flood hazard overlay should remain non-compliant when freeboard levels are not met. Unimpeded overland flowpaths are important in allowing floodwater to escape and recede. Impeded overland flowpaths may also lead to larger effects on the environment, such as contaminated flood water from commercial activities affecting water quality and human and environmental health. Amending this to discretionary provides a path for development which puts more people at risk from flood hazard and may worsen the effects of flooding in the surrounding area.	I seek that the whole of this submission be disallowed
Amend NH-R13 (Hazard sensitive activities within the overland flowpaths of the Flood Hazard Overlay) as follows: <u>1. Activity status: Restricted discretionary where compliance with NH-R13.1.a is achieved.</u> <del>1- 2. Activity status: Discretionary where compliance with NH-R13.1.a is not achieved.</del>	404.28	Oppose	NH-R13	- Hazard sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the overland flowpath area of the flood hazard overlay should remain discretionary. Unimpeded overland flowpaths are important in allowing floodwater to escape and recede. Impeded overland flowpaths may also lead to larger effects on the environment, such as contaminated flood water from commercial activities affecting water quality and human and environmental health. Amending this to restricted discretionary provides a path for development which puts more people at risk from flood hazard and may worsen the effects of flooding in the surrounding area.	I seek that the whole of this submission be disallowed
Amend Coastal Hazard Overlay table in CE - Introduction as follows: Tsunami - 1:100 year scenario inundation extent: <del>High</del> <u>Medium</u> Tsunami - 1:500 year scenario inundation extent: <del>Medium</del> <u>Low</u> <del>Tsunami - 1:1000 year scenario inundation extent: Low</del>	404.35	Oppose	General CE	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . It is not appropriate to reduce the hazard ranking to medium. Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). It is not appropriate to reduce the hazard ranking for all tsunami given the high consequence of a tsunami occurring.	I seek that the whole of this submission be disallowed
Opposes CE-P12.1. Considers this policy is very restrictive in only enabling low occupancy, risk or replacement value development within the Coastal Hazard Overlay, Amend CE-P12 (Levels of risk) as follows: Subdivision, use and development reduces the risk to people, property, and infrastructure by: <del>1. Enable subdivision, use and development that have either low occupancy, risk, or replacement value within the low, medium and high hazard areas of the Coastal Hazard Overlay;</del>	404.39	Oppose	CE-P12	- The category of high hazard area is afforded to those areas where the level of risk from natural hazard is such that mitigation is not sufficient to bring risk to a tolerable level. Many natural hazard risks are going to increase in the near future with the impact of climate change and sea level rise, and high occupancy developments in high risk areas will expose more people to increasing risk. As such avoidance of subdivision and development in these areas is appropriate.	I seek that the whole of this submission be disallowed
Amend CE-12.2 (Levels of risk) as follows: ...2. Requiring mitigation for subdivision, use and development <u>to reduce or not increase</u> <del>that addresses the impacts from the relevant coastal hazards to people, property, and infrastructure in the low, and medium, and high hazard areas;</del>	404.41	Oppose	CE-P12	- The category of high hazard area is afforded to those areas where the level of risk from natural hazard is such that mitigation is not sufficient to bring risk to a tolerable level. Coastal hazard risk is going to increase in the near future with the impact of climate change and sea level rise, and high occupancy developments in high risk areas will expose more people to increasing risk.	I seek that the whole of this submission be disallowed
Amend CE-12.3 (Levels of risk) as follows: ...3. Avoiding subdivision, use and development in the high hazard area <u>of the Coastal Inundation Overlay</u> (removing tsunami hazard) <del>unless there is a functional and</del> or operational need for the building or	404.42	Oppose	CE-P12	- Coastal hazard risk is going to increase in the near future with the impact of climate change and sea level rise, and high occupancy developments in high risk areas will expose more people to increasing risk. Additionally, mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not	I seek that the whole of this submission be disallowed

<i>activity to be located in this area and incorporates mitigation measures <del>are incorporated</del> that reduces <u>or does not increase</u> the risk to people, property, and infrastructure</i>				be deleted from the policy (ref tsunami guidance). A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes.	
Seeks to remove tsunami hazard from CE-P14 (Additions to buildings for potentially hazard sensitive activities and hazard sensitive activities within the medium coastal hazard area and high coastal hazard area)	404.92	Oppose	CE-P14	- Mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. Tsunami are not a 'remote' risk. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years <sup>5</sup> . A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes.	I seek that the part of this submission relating to natural hazard overlay be disallowed
Requests that potentially hazard sensitive activities incorporate coastal hazard mitigation measures OR tsunami evacuation routes, rather than both, because <i>it is difficult to provide mitigation measures in relation to tsunami risk</i>	404.94	Oppose	CE-P16	- While the trigger of a tsunami cannot be mitigated, the consequences can be reduced through good design, evacuation planning and communication of the risk, and land use planning may be required to ensure that tsunami evacuation routes are secured. A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. It is therefore appropriate to require measures that reduce or do not increase risk from activities within medium coastal hazard areas, as well as requiring safe tsunami evacuation routes.	I seek that the whole of this submission be disallowed
<i>Considers it is not practical to avoid hazard sensitive and potentially hazard sensitive activities in the High Coastal Tsunami Hazard Area.</i>	404.96	Oppose	CE-P18	- It is not appropriate to allow hazard-sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the high coastal tsunami hazard area. While the trigger of a tsunami cannot be mitigated, the consequences can be reduced through good design, evacuation planning and communication of the risk (refer to GNS guidance on land use planning which incorporates tsunami modelling <sup>4</sup> ).	I seek that the whole of this submission be disallowed
Requests that subdivision and development in the CCZ within coastal hazard zones incorporate coastal hazard mitigation measures OR tsunami evacuation routes, rather than both, because <i>it is difficult to provide mitigation measures in relation to tsunami risk</i>	404.101	Oppose	CE-P22	- While the trigger of a tsunami cannot be mitigated, the consequences can be reduced through good design, evacuation planning and communication of the risk. A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. It is appropriate to require measures that reduce or do not increase risk from activities within medium coastal hazard areas, as well as requiring safe tsunami evacuation routes (refer to GNS guidance on land use planning which incorporates tsunami modelling <sup>4</sup> ).	I seek that the whole of this submission be disallowed
<i>Amend CE-R18.1 (Additions to buildings within the Coastal Hazard Overlays) as follows: Permitted when...e. <u>The additions are in the Tsunami Hazard Overlay</u></i>	404.103	Oppose	CE-R18	- Mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years <sup>1</sup> . A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. Additions to buildings (e.g. for vertical evacuation purposes) should be encouraged to allow people to safely evacuate.	I seek that the whole of this submission be disallowed
<i>Amend CE-R18.2.b (Additions to buildings within the Coastal Hazard Overlays) as follows: Restricted Discretionary where ...b. <u>The addition is to a potentially hazard sensitive activity or a hazard sensitive activity within a high coastal hazard area other than the high tsunami hazard area.</u></i>	404.104	Oppose	CE-R18	- Mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years <sup>1</sup> . A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. Additions to buildings (e.g. for vertical evacuation purposes) should be encouraged to allow people to safely evacuate.	I seek that the whole of this submission be disallowed
<i>Amend CE-R20 (Potentially hazard sensitive activities or hazard sensitive activities within the City Centre Zone and are also within the medium and high coastal hazard areas): Permitted where: 1. <u>It does not involve the construction of a</u></i>	404.106	Oppose	CE-R20	- Coastal hazard risk is going to increase in the near future with the impact of climate change and sea level rise, and high occupancy developments in high risk areas will expose more people to increasing risk.	I seek that the whole of this submission be disallowed

<sup>5</sup> <https://www.eastcoastlab.org.nz/our-science/our-projects/hikurangi-subduction-earthquakes-and-slip-behavior-research-project/article/216/1-in-4-chance-of-a-magnitude-8-or-greater-earthquake-in-the-next-50-years-scientists-uncover-crucial-knowledge-about-our-largest-and-most-active-fault?t=featured&s=3>

building that would be occupied <del>predominantly by more than 10 employees of the activity, or any members of the public</del> ; or 2. It does not involve the conversion of an existing building into a building that would be occupied <del>predominantly by more than 10 employees of the activity, or any members of the public</del>					
<b>Submission 470</b> <b>Stride Investment Management Ltd.</b> <b>Bianca Tree/Amy Dresser</b> <b>bianca.tree@minterellison.co.nz</b> <b>amy.dresser@minterellison.co.nz</b>	Sub no./ point no.	Support/ oppose	Provision		
Amend NH-R11.2 (Hazard sensitive activities in the inundation area of the Flood Hazard Overlay) as follows:2. Activity Status: <del>Non-Complying</del> <u>Discretionary</u> Where Compliance with the requirements of NH-R11.1.a cannot be achieved.	470.18	Oppose	NH-R11	- Hazard sensitive activities, which include emergency facilities, hospitals, major hazardous facilities and childcare, within the inundation area of the flood hazard zone should remain non-compliant when the floor level required for restricted discretionary status is not met. Amending this to discretionary provides a path for development which puts more people at risk from flood hazard.	I seek that the whole of this submission be disallowed
Amend NH-R12.2 (Potentially hazard sensitive activities in the inundation area of the Flood Hazard Overlay) as follows:2. Activity Status: <del>Non-Complying</del> <u>Discretionary</u> Where Compliance with the requirements of NH-R12.1.a cannot be achieved.	470.20	Oppose	NH-R12	- Potentially hazard sensitive activities, which include commercial activities, offices, and retail activities, within the inundation area of the flood hazard zone should remain non-compliant when the floor level required for restricted discretionary status is not met. Amending this to discretionary provides a path for development which puts more people at risk from flood hazard.	I seek that the whole of this submission be disallowed
<b>Submission 406</b> <b>Wellington International Airport</b> <b>Kirsty O'Sullivan (Michael Daysh)</b> <b>kirsty.osullivan@mitchelldaysh.co.nz</b>	Sub no./ point no.	Support/ oppose	Provision		
Amend the extent of the Liquefaction Hazard Overlay to remove it from the extent of the Airport Zone. Considers that the engineering and design requirements of airport infrastructure, including the requirements under the CDEM to remain operational following a natural hazard event, mean that liquefaction and flood hazard inundation cannot occur on site for operational reasons. In the unlikely event that such events did arise, immediate action would be taken to rectify the situation to allow the operation of the airport to continue.	406.19	Oppose	Mapping General	- The liquefaction hazard overlay in the Proposed District plan is based on the High and Very High liquefaction susceptibility areas in Griffin et al (2020) <sup>6</sup> . These zones are based on cone penetrometer tests, and analysis of geomorphology, hydrology and site conditions, and do not take into account likely post-event remediation of liquefaction effects. The part of the Airport within the liquefaction overlay is an area of anthropogenic fill, which is in all cases highly susceptible to liquefaction. If geotechnical engineering has been done to mitigate liquefaction risk, the risk may be lessened, but the submission does not provide examples of this.	I seek that the whole of this submission be disallowed
Amend the extent of the Flood Hazard Overlay to remove it from the extent of the Airport Zone. Considers that the engineering and design requirements of airport infrastructure, including the requirements under the CDEM to remain operational following a natural hazard event, mean that liquefaction and flood hazard inundation cannot occur on site for operational reasons. In the unlikely event that such events did arise, immediate action would be taken to rectify the situation to allow the operation of the airport to continue.	406.20	Oppose	Mapping General	- The flood inundation overlay is based on probability maps by Wellington Water of likely ponding areas in the event of a flood. It does not take into account likely post-event remediation of flooding effects. If geotechnical engineering has been done to mitigate flood inundation risk, the risk may be lessened, but the submission does not provide examples of this.	I seek that the whole of this submission be disallowed
Delete all Flood Hazard Overlays from the Airport Zone.	406.25	Oppose	Flood Hazard Overlay	- The flood inundation overlay is based on probability maps by Wellington Water of likely ponding areas in the event of a flood. It does not take into account likely post-event remediation of flooding effects. If geotechnical engineering has been done to mitigate flood inundation risk, the risk may be lessened, but the submission does not provide examples of this.	I seek that the whole of this submission be disallowed
Delete all Liquefaction Hazard Overlays from the Airport Zone.	406.26	Oppose	Liquefaction Hazard	- The liquefaction hazard overlay in the Proposed District plan is based on the High and Very High liquefaction	I seek that the whole of this submission be

<sup>6</sup> <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/spatial-plan/liquefaction-susceptibility-report---may-2021.pdf>

			Overlay	susceptibility areas in Griffin et al (2020). These zones are based on cone penetrometer tests, and analysis of geomorphology, hydrology and site conditions, and do not take into account likely post-event remediation of liquefaction effects. The part of the Airport within the liquefaction overlay is an area of anthropogenic fill, which is in all cases highly susceptible to liquefaction. If geotechnical engineering has been done to mitigate liquefaction risk, the risk may be lessened, but the submission does not provide examples of this.	disallowed
Amend INF-NH-R60 (New above ground infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays) as follows: 1.Activity status: Permitted where: a.The infrastructure is located within:....vi.High hazard area of the Coastal Hazard Overlay within the Natural OpenSpace Zone between Lyall Bay and Moa Point. 2.Activity status: Restricted Discretionary Where: a.The infrastructure is located within the:....iv.High hazard area of the Coastal Hazard Overlay outside of the CityCentre Zone or outside of the Natural Open Space Zone between LyallBay and Moa Point.	406.153	Oppose	INF-NH-R60	- The coast between Lyall Bay and Moa Point is subject to multiple coastal hazards, particularly coastal inundation, erosion and tsunamis. This area is also at risk from liquefaction in the event of an earthquake. Coastal hazard risk will increase in the near future due to sea level rise and other effects of climate change. Limiting restriction on infrastructure development in this area may allow for development in inappropriate areas which are not sustainable in the long term.	I seek that the whole of this submission be disallowed
Delete INF-NH-R59 (Temporary infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays) or amend as follows:1.Activity status: Permitted where: a.The temporary infrastructure is not located within the:....iv.The high hazard area of the Coastal Hazard Overlay outside of theNatural Open Space Zone located between Lyall Bay and Moa Point	406.155 406.156	Oppose	INF-NH-R59	- The coast between Lyall Bay and Moa Point is subject to multiple coastal hazards, particularly coastal inundation, erosion and tsunamis. This area is also at risk from liquefaction in the event of an earthquake. Coastal hazard risk will increase in the near future due to sea level rise and other effects of climate change. Limiting restriction on infrastructure development in this area may allow for development in inappropriate areas which are not sustainable in the long term.	I seek that the whole of this submission be disallowed
Delete INF-NH-R60 (New above ground infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays) or amend as follows: 1.Activity status: Permitted where :a.The infrastructure is located within:....vi.High hazard area of the Coastal Hazard Overlay within the Natural OpenSpace Zone between Lyall Bay and Moa Point.2.Activity status: Restricted DiscretionaryWhere:a.The infrastructure is located within the:....iv.High hazard area of the Coastal Hazard Overlay outside of the CityCentre Zone or outside of the Natural Open Space Zone between LyallBay and Moa Point.	406.158	Oppose	INF-NH-R60	- The coast between Lyall Bay and Moa Point is subject to multiple coastal hazards, particularly coastal inundation, erosion and tsunamis. This area is also at risk from liquefaction in the event of an earthquake. Coastal hazard risk will increase in the near future due to sea level rise and other effects of climate change. Limiting restriction on infrastructure development in this area may allow for development in inappropriate areas which are not sustainable in the long term.	I seek that the whole of this submission be disallowed
Submitter seeks either deletion of NH-O1 (Risk from natural hazards) or an amendment to NH-O1 (Risk from natural hazards) as follows: Subdivision, use and development in the Natural Hazard Overlays <u>do not create an intolerable level of risk</u> <del>reduces or does not increase</del> the risk to people, property, and infrastructure.	406.210	Oppose	NH-O1	- Toka Tū Ake supports the suggestion that the concept of risk tolerance be included in natural hazard provisions. However, natural hazard risk tolerance is a concept which varies widely between people and communities, and it is impractical to include it in this instance as a comprehensive definition of 'tolerable' risk has not been developed, nor has one been offered. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed
Seeks that NH-P2 (Levels of risk) is either deleted or amended to introduce the concept of tolerability.	406.216	Oppose	NH-P2	- Toka Tū Ake supports the suggestion that the concept of risk tolerance be included in natural hazard provisions. However, natural hazard risk tolerance is a concept which varies widely between people and communities, and it is impractical to include it in this instance as a comprehensive definition of 'tolerable' risk has not been developed nor has one been offered. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed

<i>Seeks that coastal hazard overlays are amended to focus only on coastal inundation hazards. Considers that tsunami hazard response within existing urban areas requires a broader management response that is best managed collectively by emergency management groups such as Civil Defence.</i>	406.291	Oppose	General CE	- While the trigger of a tsunami cannot be mitigated, the consequences can be reduced through good design, evacuation planning and communication of the risk, and the tsunami hazard overlay should not be deleted from the policy. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years <sup>1</sup> . A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. Land use planning and emergency management options need to be complimentary.	I seek that the whole of this submission be disallowed
<i>Amend the Coastal Environment Chapter to apply coastal tsunami hazard provisions only to new Greenfield developments.</i>	406.291	Oppose	General CE	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). Intensification and further development of brownfield sites as well as development of greenfield sites should be restricted within tsunami hazard overlays (refer to GNS guidance on land use planning which incorporates tsunami modelling <sup>4</sup> ).	I seek that the whole of this submission be disallowed
<i>Seeks that CE-P11 (Identification of coastal hazards) is deleted or amended to only apply to the coastal inundation hazard areas and recognise the concept of tolerability.</i>	406.317	Oppose	CE-P11	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). The tsunami hazard overlay should not be deleted from the policy. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed
<i>Seeks that CE-P12 (Levels of risk) is deleted or amended to only apply to the coastal inundation hazard areas and recognise the concept of tolerability.</i>	406.319	Oppose	CE-P12	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). The tsunami hazard overlay should not be deleted from the policy. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed
<i>Seeks that CE-P14 (Additions to buildings for potentially hazard sensitive activities and hazard sensitive activities within the medium coastal hazard area and high coastal hazard area) is deleted or amended to only apply to the coastal inundation hazard areas and recognise the concept of tolerability.</i>	406.321	Oppose	CE-P14	- Mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. Tsunami are not a remote risk. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years <sup>1</sup> . A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed
<i>Seeks that CE-P15 (Subdivision and hazard sensitive activities within the low coastal hazard areas) is deleted or amended to only apply to the coastal inundation hazard areas and recognise the concept of tolerability.</i>	406.323	Oppose	CE-P15	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). The tsunami hazard overlay should not be deleted from the policy. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed
<i>Seeks that CE-P16 (Potentially hazard sensitive activities within the medium coastal hazard areas) is deleted or</i>	406.325	Oppose	CE-P16	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g.	I seek that the whole of this submission be disallowed

<i>amended to only apply to the coastal inundation hazard areas and recognise the concept of tolerability.</i>				Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). The tsunami hazard overlay should not be deleted from the policy. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	
<i>Seeks that CE-P17 (Hazard sensitive activities in the medium coastal hazard areas) is deleted or amended to only apply to the coastal inundation hazard areas and recognise the concept of tolerability.</i>	406.327	Oppose	CE-P17	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). The tsunami hazard overlay should not be deleted from the policy. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed
<i>Seeks that CE-P19 (Subdivision, use and development which will not be occupied by members of the public, or employees associated with the Airport, operation port Activities, passenger port facilities and rail activities in the Coastal Hazards Overlays) is deleted or amended to only apply to the coastal inundation hazard areas and recognise the concept of tolerability.</i>	406.329	Oppose	CE-P19	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). The tsunami hazard overlay should not be deleted from the policy. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed
<i>Seeks that CE-P20 (Subdivision, use and development which will be occupied by members of the public, or employees associated with the Airport, operation port activities, passenger port facilities and rail activities in the Coastal Hazards Overlays) is deleted or amended to only apply to the coastal inundation hazard areas and recognise the concept of tolerability.</i>	406.331	Oppose	CE-P20	- The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunami are a very high impact hazard, and for a locally sourced event (e.g. Hikurangi subduction zone or local fault) there will be limited time to evacuate <sup>1</sup> . Land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). The tsunami hazard overlay should not be deleted from the policy. Deletion of this provision is not an appropriate alternative to including risk tolerance, as it is important to limit development in areas at risk from natural hazards.	I seek that the whole of this submission be disallowed
<i>Seeks that CE-R18 (Additions to buildings within the Coastal Hazard Overlays) is deleted or amended to apply to coastal inundation hazard areas only.</i>	406.342 406.343	Oppose Oppose	CE-R18	- Mitigation of risks from tsunami is possible with land use planning and building design, and tsunami risk should not be deleted from the policy. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years <sup>1</sup> . A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes. Additions to buildings (e.g. for vertical evacuation purposes) should be encouraged to allow people to safely evacuate.	I seek that the whole of these submissions be disallowed
<i>Seeks that CE-R19 (Airport, operation port activities, passenger port facilities and rail activities within the Coastal Hazard Overlay) is deleted or amended to apply to coastal inundation hazard areas only.</i>	406.345 406.346	Oppose Oppose	CE-R19	- While the trigger of a tsunami cannot be mitigated, the consequences can be reduced through good design, evacuation planning and communication of the risk, and the tsunami hazard overlay should not be deleted from the policy. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years <sup>1</sup> . A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes.	I seek that the whole of these submissions be disallowed
<i>Seeks that CE-R22 (Hazard sensitive activities in the low coastal hazard area) is deleted or amended to apply to coastal inundation hazard areas only.</i>	406.349 406.350	Oppose Oppose	CE-R22	- While the trigger of a tsunami cannot be mitigated, the consequences can be reduced through good design, evacuation planning and communication of the risk, and the tsunami hazard overlay should not be deleted from the policy. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years <sup>1</sup> . A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington	I seek that the whole of these submissions be disallowed



<p><i>Seeks that CE-23 (Potentially hazard sensitive activities in the medium coastal hazard area, excluding the City Centre Zone or Airport, operation port activities, passenger port facilities and rail activities) is deleted or amended to apply to coastal inundation hazard areas only.</i></p>	<p>406.352 406.353</p>	<p>Oppose Oppose</p>	<p>CE-R23</p>	<p>within 10 minutes.</p> <p>- While the trigger of a tsunami cannot be mitigated, the consequences can be reduced through good design, evacuation planning and communication of the risk, and the tsunami hazard overlay should not be deleted from the policy. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years<sup>1</sup>. A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes.</p>	<p>I seek that the whole of these submissions be disallowed</p>
<p><i>Seeks that CE-R26 (Hazard sensitive activities within the medium coastal hazard area, excluding the City Centre Zone or Airport, operation port activities, passenger port facilities and rail activities) is deleted or amended to apply to coastal inundation hazard areas only.</i></p>	<p>406.358 406.359</p>	<p>Oppose Oppose</p>	<p>CE-R26</p>	<p>- While the trigger of a tsunami cannot be mitigated, the consequences can be reduced through good design, evacuation planning and communication of the risk, and the tsunami hazard overlay should not be deleted from the policy. The current probability of a rupture of the Hikurangi subduction zone is calculated as 25% in the next 50 years<sup>1</sup>. A Hikurangi subduction earthquake is expected to result in a 2-4 m tsunami to impact parts of Wellington within 10 minutes.</p>	<p>I seek that the whole of these submissions be disallowed</p>

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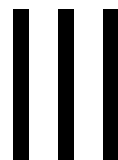
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