

To the Planning Team, Hutt City Council

Name of submitter: Sarah-Jayne McCurrach, Head of Risk Reduction

Organisation: Natural Hazards Commission Toka Tū Ake

Email: resilience@naturalhazards.govt.nz

Date: 24 July 2025

Thank you for the opportunity to submit further on the **Proposed District Plan**.

The Natural Hazards Commission Toka Tū Ake (NHC) is a Crown Entity responsible for providing residential property owners with a current contract of fire insurance for their residential property with insurance against damage from natural hazards covered by the Natural Hazards Insurance Act 2023 (NHI Act).

Our focus is on ensuring long-term resilience by encouraging building in areas that will remain safe and sustainable for future generations. Developing in zones at high risk from natural hazards exposes future owners to complex and potentially hazardous situations, which could compromise the longevity and safety of these developments.

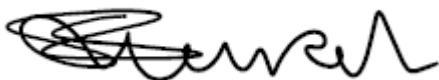
NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. In alignment with our original submission, we support some submissions on the **Proposed District Plan** in this regard, and we have identified some submissions that we oppose.

We support Greater Wellington Regional Council, where they have made submission points to strengthen provisions and rules for natural hazard risk reduction and resilience. We oppose submission points from Sensible Solutions for Eastbourne where they are requesting the removal of Hazard Overlays and rules relating to natural hazard risk reduction.

Our comments on these submissions can be found in the attached Further Submission Table.

We welcome the opportunity to discuss our further submission with council officers if this would be helpful. Please feel free to contact us at any time.

Yours sincerely,



Sarah-Jayne McCurrach,

Head of Risk Reduction, Natural Hazards Commission Toka Tū Ake

Form 6, Clause 8 of Schedule 1, Resource Management Act 1991

Natural Hazards Commission Toka Tū Ake Further Submission on the Proposed Lower Hutt District Plan

To: Hutt City Council

Via Council submission email: district.plan@huttcity.govt.nz

Submitter: Natural Hazards Commission Toka Tū Ake (NHC)

1. This is a further submission on the following:

The Proposed District Plan notified on 06/02/2025.

2. NHC is an organisation who has an interest in the proposal that is greater than the interest the general public has.

As NHC is the 'first loss' insurer for residential damage resulting from natural hazards listed in the NHI Act, NHC carries significant financial risk on behalf of the Crown. This means that NHC has a strong interest in reducing risk from, and building resilience to, natural hazards across New Zealand

3. NHC supports, is neutral, or opposes the submissions of original submitters to the extent outlined in this submission.

4. NHC does wish to be heard in support of this further submission.

Date: 24/07/2025

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Further Submissions Table

Original Submitter	Submission Number	Description	Support/ Oppose	Reasoning	Requested Action
Greater Wellington Regional Council	452.2	Retain the definition of 'Activity most sensitive to natural hazards' as notified.	Support in part	<p>We support retaining the proposed definition of 'Activity most sensitive to natural hazards'. The activities listed are likely to experience greater impacts in natural hazard events. Therefore, identifying these activities is a useful way to reduce the impacts to people and property from natural hazard events.</p> <p>We recommend altering the definition wording of 'Activity' to 'Activities' to match wording used throughout the Natural Hazards section of the proposed district plan, which specifies:</p> <p>Different activities by their nature present different consequences to natural hazards. For the provisions in this chapter, activities are classified as:</p> <ul style="list-style-type: none"> • Activities most sensitive to natural hazards, • Activities potentially sensitive to natural hazards, and • Activities least sensitive to natural hazards. 	We seek that this submission be allowed, provided the definition is updated to 'Activities'.

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Greater Wellington Regional Council	452.8	Amend the definition of Hydraulic neutrality as follows: Means managing stormwater runoff from all new lots or development through either on-site disposal or storage, so that stormwater is released from the site at a rate that does not exceed the pre-development peak stormwater runoff, <u>in the 10% annual exceedance probability and 1% annual exceedance probability modelled design rainfall events including the predicted impacts of climate change.</u>	Support	We support the proposed amendment to the wording of Hydraulic neutrality as it reduces the impacts of flood events on people and property. Specifying modelled flood extents is a useful way to avoid confusion and ensure the consistent application of rules and policies. We support requiring a 1% AEP flood event as planning to this level represents a precautionary approach and is becoming standard across the country. Wellington City Council, Auckland Council, and Whangārei District Council all have rules and policies for a 1% AEP flood event. We also support the inclusion of climate change because it is likely to bring more frequent and intense rainfall to Hutt City, exacerbating the impacts from flooding.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.11	Retain the definition of 'Natural Hazard' as notified.	Support in part	<p>We support retaining the definition outlined in the Resource Management Act for Natural Hazard. However, we recommend adding another definition for 'cumulative natural hazards', using the Auckland Council Natural Hazard Risk Communication Toolbox definition¹ 'where two or more unrelated natural hazard events have the potential to affect human life'. The combination of definitions can reduce the impacts of natural hazard events on people and property by ensuring there are rules and policies to manage the risk from all the different hazards that could occur in Hutt City.</p> <p>1Auckland Council (2014). Natural Hazard Risk Communication Toolbox.</p>	<p>We seek that this submission be allowed; provided the following amendment is made:</p> <p>A definition for 'cumulative natural hazards' is added:</p> <p>'two or more unrelated natural hazard events have the potential to affect human life or property'.</p>

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Greater Wellington Regional Council	452.12	Insert a new definition as follows: <u>Resilient or resilience, in relation to natural hazards and climate change: Means the capacity and ability of natural and physical resources, including people, communities, businesses, infrastructure, and ecosystems, to withstand the impacts and recover from the effects of climate change, including natural hazard events.</u>	Support in part	We support including a definition for Resilience. However, we recommend altering the proposed definition to reflect that resilience also includes taking steps to anticipate and prepare for disruptive events. The NHC Resilience strategy ¹ outlines that natural hazards resilience encourages proactive action - both to reduce risks, and to build capacity to better deal with the impacts of hazards when they occur. ¹NHC Resilience Strategy for Natural Hazard Risk Reduction (2024-2029).	We seek that this submission be allowed; provided the following amendment is made: Resilient or resilience, in relation to natural hazards and climate change: Means the capacity and ability of natural and physical resources, including people, communities, businesses, infrastructure, and ecosystems, to <u>prepare for</u> , withstand, and recover from the effects of natural hazard events, including climate change.
Greater Wellington Regional Council	452.16	Amend CCSD-O1 (Carbon Neutral) as follows: CCSD-O1 Carbon Neutral <u>and Climate-Resilient</u> . The urban form and built development in Lower Hutt support the transition of the city to <u>become more climate-resilient</u> , and carbon neutral by 2050.	Support	We support GWRC's additions to add climate resilience to this objective. This objective is important for Hutt City's strategic direction for managing climate change. It should therefore, reference not only being carbon neutral, but also climate resilient. Increased climate resilience will reduce the impacts of natural hazard events on people and property by accommodating for the ways that climate change will change and exacerbate natural hazard events.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.18	Amend INFSD-O6 (Water Sensitive Design) as follows: INFSD-05: Water Sensitive Design <u>Green Infrastructure</u> New development integrates <u>green infrastructure</u> , including water sensitive design, <u>to protect</u> or improve <u>environmental freshwater</u> quality and <u>provide other benefits</u> such as avoiding or mitigating the	Support	We agree with the proposed amendment to broaden this objective to apply to green infrastructure. Green infrastructure plays a vital role in water and natural hazard management, reducing the impacts of flood events on people and property.	We seek that this submission be allowed.

		risks of flooding, <u>increasing the resilience of people and infrastructure to the effects of climate change.</u>			
Greater Wellington Regional Council	452.19	Retain NESD-O1 (Te Awa Kairangi/Hutt River) as notified.	Support	We agree that the health and wellbeing of Te Awa Kairangi/the Hutt River should be restored and protected. In turn, this may offer a range of benefits, including improved flood protection and resilience.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.33	Amend as follows: INF-O1 Benefits of infrastructure and <u>green infrastructure</u> The national, regional and local benefits of infrastructure <u>and green infrastructure</u> are recognised and provided for.	Support	We support the inclusion of green infrastructure into this objective. Green infrastructure offers multiple benefits, including increased flood and climate change resilience in urban areas, reducing the impacts of flood events on people and property.	We seek that this submission be allowed.
	452.34	Amend INF-O3 (Infrastructure availability and capacity) as follows: Enable safe, resilient, sustainable, responsive and efficient infrastructure that is well integrated with, and able to meet the needs of, subdivision, use, and development., <u>prioritising the use of green infrastructure as far as practicable.</u>	Support	We support the inclusion of green infrastructure into this objective. Green infrastructure offers multiple benefits, including increased flood and climate change resilience in urban areas, reducing the impacts of flood events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.35	Amend INF-P1 (Recognise benefits of infrastructure) as follows: Amend as follows: INF-P1: Recognise benefits of infrastructure <u>and green infrastructure.</u>	Support	We support the inclusion of green infrastructure into this policy. Green infrastructure offers multiple benefits, including increased flood and climate change resilience in urban areas, reducing the	We seek that this submission be allowed.

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				impacts of flood events on people and property.	
Greater Wellington Regional Council	452.36	<p>Amend INF-P2 (Provide for infrastructure) as follows:</p> <p>INF-P2: Provide for infrastructure <u>and green infrastructure</u></p> <p>1. Enabling safe, resilient, effective, and efficient operation, maintenance, repair, minor upgrade, or decommissioning of infrastructure <u>and green infrastructure</u></p> <p>2. Providing for other upgrades to, and the development of new infrastructure <u>and green infrastructure</u>, and</p> <p>3. Enabling investigation and monitoring activities associated with infrastructure <u>and green infrastructure</u> operations.</p>	Support	We support the inclusion of green infrastructure into this policy. Green infrastructure offers multiple benefits, including increased flood and climate change resilience in urban areas, reducing the impacts of flood events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.37	<p>Amend INF-P3 (Planning and delivery of infrastructure) as follows:</p> <p>INF-P3: Planning and delivery of infrastructure <u>and green infrastructure</u></p> <p>Add reference to <u>green infrastructure</u> to each clause alongside reference to infrastructure.</p>	Support	We support the inclusion of green infrastructure into this policy. Green infrastructure offers multiple benefits, including increased flood and climate change resilience in urban areas, reducing the impacts of flood events on people and property.	We seek that this submission be allowed.

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Greater Wellington Regional Council	452.38	<p>Add new policy as follows, or similar:</p> <p><u>INF-PX: Promote the use of green infrastructure</u></p> <p><u>Promote and support the integration of green infrastructure as part of subdivision, use and development to provide services for people and communities while improving ecosystem health, resilience and indigenous biodiversity.</u></p>	Support	<p>We support the addition of a new policy for the promotion of green infrastructure. Green infrastructure offers multiple benefits, including increased flood and climate change resilience in urban areas, reducing the impacts of flood events on people and property.</p>	<p>We seek that this submission be allowed.</p>
Greater Wellington Regional Council	452.72	<p>Maps - Natural and Coastal Hazard Overlays:</p> <p>Replace the Flood Hazard Overlays with those included in Attachment 3 (see original GWRC submission for attachment).</p>	Support	<p>We support the recommendation to incorporate the 1-dimensional channel areas within the Flood Hazard Overlays. The current map only represents areas modelled in 2D, and excludes the areas modelled in 1D such as the Hutt River and berms. The omission of this area within the Flood Hazard Overlays does not accurately represent the risk from the Hutt River. Updating the Flood Hazard Overlays will allow for more effective flood risk management and reduce the impacts of flood events on people and property.</p>	<p>We seek that this submission be allowed.</p>
Greater Wellington Regional Council	452.73	<p>NH - Natural Hazards Introduction: Add a bullet point to the list under the heading Natural Hazard Risk as follows:</p> <p><u>Building long-term resilience to the impacts from natural hazards and effects of climate change.</u></p>	Support	<p>We support a new bullet point for building long-term resilience. Long-term resilience is essential for managing the impacts to people and property from natural hazard events, including the ways that climate change will exacerbate the impacts from natural hazards.</p>	<p>We seek that this submission be allowed.</p>

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Greater Wellington Regional Council	452.74	Amend NH-O1 (Risk from Natural Hazards in High Natural Hazard Overlays) as follows: Subdivision, use and development within the High Natural Hazard Overlays reduce or avoid increasing the existing risk from natural hazards to people, buildings and infrastructure.	Support	We support the proposed amendment to remove 'reduce' from the NH-O1 objective. Subdivision, use, and development should be avoided in areas where existing levels of natural hazard risk will be increased within the High Natural Hazard Overlay. Existing levels of natural hazard risk should not be used to justify further development or use as the existing risk can be at, or nearing, an intolerable level.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.75	Retain NH-O2 (Risk from natural hazards in Low Natural Hazard Overlays and Medium Natural Hazard Overlays) as notified.	Support in part	We support requiring that subdivision, use and development minimises the risk from natural hazards in the Low and Medium Natural Hazard Overlays. However, we suggest that the wording " <u>as low as reasonably practicable</u> " is added, to ensure that natural hazard mitigation efforts are completed to a consistent and robust standard.	We seek that this submission be allowed; provided the following amendment is made: Subdivision, use and development within the Low Natural Hazard Overlays and Medium Natural Hazard Overlays minimise the risk from natural hazards to people, buildings and infrastructure <u>to as low as reasonably practicable</u> .
Greater Wellington Regional Council	452.76	Retain NH-O3 (Subdivision, Use and Development in the General Industrial Zone and Heavy Industrial Zone in Seaview, the Metropolitan Centre Zone in Petone and the Seaview Marina Zone and within the Medium Flood Hazard Overlay or High Flood Hazard Overlay) as notified.	Support in part	We support objective NH-O3. However, we suggest that the wording " <u>as low as reasonably practicable</u> " is added, to ensure that natural hazard mitigation efforts are completed to a consistent and robust standard.	We seek that this submission be allowed; provided the following amendment is made: Provide for subdivision, use and development in the General Industrial Zone and Heavy Industrial Zone in Seaview, Metropolitan Centre Zone in Pito One and Seaview Marina Zone while also ensuring development and use in this area minimises the risk from flood hazards to people, buildings and infrastructure <u>to as low as reasonably practicable</u> .

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Greater Wellington Regional Council	452.77	Retain NH-O4 (Planned Natural Hazard Mitigation Works) as notified.	Support in part	We support NH-O4, to ensure that mitigation works reduce the impacts of flood events on people and property. However, residual risk is an important consideration when planning flood mitigation works, particularly given that Hutt City is dependent on these works to protect large parts of the city. Residual risks need to be assessed and managed in case the mitigation works fail.	We seek that this submission be allowed; provided the following amendment is made: Risk to people, buildings and infrastructure from flood hazards is reduced through: 1. Mitigation works <u>where appropriate and practicable; and</u> 2. <u>The management of residual risks.</u>
Greater Wellington Regional Council	452.78	Retain NH-O5 (Natural Systems and Features) as notified.	Support	We support the use of natural systems and features in natural hazard risk reduction measures. The use of soft engineering and natural features reduce the impacts of flood events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.79	Retain NH-P1 (Risk-Based Approach) as notified.	Support	NHC supports and advocates for risk-based land use planning for natural hazard risk reduction. A risk-based approach allows for the inclusion of property and infrastructure as considerations when assessing the consequences of natural hazards, as opposed to solely considering life safety. Retaining the useability of critical infrastructure and the liveability of dwellings is a crucial component in swifter and less costly response and recovery following natural hazard events.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.80	Retain NH-P2 (Levels of Risk) as notified.	Support in part	We support retaining NH-P2. However, we recommend providing definitions for 'reduce' and 'minimise' in the definitions chapter to reduce confusion and ensure the consistent application of rules and policies. We recommend the definition for 'reduce' being adapted from UNDRR ¹ .	We seek that this submission be allowed; provided definitions for 'reduce' and 'minimise' are supplied.

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				¹United Nations Office for Disaster Risk Reduction (n.d.). Sendai Framework Terminology on Disaster Risk Reduction.	
Greater Wellington Regional Council	452.81	Amend NH-P3 (Natural systems and features) as follows: Maintain and enhance natural systems and features where they will reduce the existing risk posed by natural hazards to people, buildings and infrastructure <u>and manage activities so that significant adverse effects on these systems or features are avoided and other adverse effects are avoided, minimised or remedied.</u>	Support	We support the suggested amendments to this policy. Ensuring there are no adverse effects to natural systems, which are used for reducing risk, will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.82	Retain NH-P4 (Natural hazard mitigation) as notified.	Support	We support retaining this policy as notified. The policy will be able to mitigate natural hazard risk and reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.83	Seeks to define NH-P6 (Additions to existing buildings and structures within the Fault Location Area) as follows: Seeks to define where the 20m is to be measured from, e.g. the fault trace or an identified fault rupture zone.	Support	We support clarifying what the fault deformation zone entails and where the 20m is to be measured from to reduce confusion and ensure the consistent application of rules and policies. A fault avoidance zone generally entails a buffer zone of 20m on either side of a known fault trace or likely fault rupture zone ¹ . ¹Ministry for the Environment (2003). Planning for development of land on or close to active faults.	We seek that this submission be allowed.
Greater Wellington	452.84	Amend clause 4.a in NH-P8 (Additions to existing buildings and	Support	We support adding wording that explicitly excludes residential activities. Residential activities can contribute to increased natural	We seek that this submission be allowed.

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Regional Council		<p>structures in the Flood Hazard Overlays).</p> <p>a. The risk from the 1% Annual Exceedance Probability flood event is low due to either the:</p> <ul style="list-style-type: none"> i. Proposed mitigation measures, or ii. Size of the addition, or iii. Nature of the activities undertaken within the addition, <u>which cannot include residential activities.</u> 		<p>hazard risk as they have a high level of vulnerability to natural hazard events. Therefore, ensuring that they are excluded from additions in the Flood Hazard Overlays will reduce the impacts of flood events on people and property.</p>	
Greater Wellington Regional Council	452.85	<p>Amend NH-P9 (Subdivision, use and development in the Flood Hazard Overlays)</p> <p>1. Allow for new buildings, structures, building platforms, and the conversion of existing buildings that will contain activities least sensitive to natural hazards in the Low Flood Hazard Overlay, <u>will not impede or block pathways of flood water and will not significantly increase the risks to adjacent buildings and people.</u></p>	Support	<p>We agree that Subdivision, use and development in the Flood Hazard Overlays should not impede or block flood water pathways, or increase risks to adjacent buildings and people. The unimpeded conveyance of flood water is essential for reducing the impacts of flooding by not creating additional areas of inundation or ponding.</p> <p>We note that several GWRC amendments use 'neighbouring' and 'adjacent' interchangeably and suggest one term be applied to ensure consistency across the plan.</p>	We seek that this submission be allowed.
Greater Wellington Regional Council	452.86	<p>Delete NH-P10 (Residential Apartments in the Medium Flood Hazard Overlay and High Flood Hazard Overlay), or amend as follows:</p>	Support in part	<p>We support amending this policy to include access to safe evacuation routes and unimpeded over land flow paths. The provision of safe evacuation routes can protect life safety during flood events and reduce the impacts of flood events on people and property. However, we recommend specifying</p>	<p>We seek that this submission be allowed; provided the following amendment is made:</p> <p>6. Access & egress during <u>1% AEP</u> flood events and the requirement for an emergency response plan to be put in</p>

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		<p>Provide for residential apartments within the Medium Flood Hazard Overlay and High Flood Hazard Overlay where:</p> <p><u>6. Access & egress during flood events and the requirement for an emergency response plan to be put in place by the building owner.</u></p> <p><u>7. Not increase flood risk to neighbouring properties or impede over land flow paths.</u></p>		<p>that access and egress routes should be available in 1% AEP flood events to avoid confusion and ensure the consistent application of rules and policies. We also recommend requiring emergency response plans to be exercised and updated regularly.</p> <p>We note that several GWRC amendments use 'neighbouring' and 'adjacent' interchangeably and suggest one term be applied to ensure consistency across the plan.</p>	<p>place by the building owner. <u>Emergency response plans must be maintained, exercised, and updated annually by the body corporate.</u></p>
Greater Wellington Regional Council	452.87	Retain NH-P11 (Subdivision, Use and Development in the Liquefaction Hazard Overlay) as notified.	Support in part	<p>We support NH-P11 as it can reduce the impacts to people and property from liquefaction. However, we recommend amending the policy to require foundations to be designed by a certified engineer. This is in line with the MBIE/MfE guidance for potentially liquefaction prone land¹ and will reduce the impacts to people and property from natural hazard events.</p> <p><u>¹MBIE/MfE (2017). Planning and engineering guidance for potentially liquefaction prone land.</u></p>	<p>We seek that this submission be allowed; provided the following amendment is made:</p> <p>3. Provide for new building platforms, new buildings and structures and the conversion of existing buildings for activities most sensitive to natural hazards (with the exception of childcare services, retirement villages, educational facilities, hospitals, emergency service facilities and health care facilities) within the Liquefaction Hazard Overlay, <u>where:</u></p> <p><u>a. Foundations are designed by a certified engineer to prevent liquefaction induced deformation of the building.</u></p>
Greater Wellington Regional Council	452.88	Retain NH-P12 (Subdivision in the Slope Assessment Overlay) as notified.	Support	<p>We support retaining NH-P12 as notified because the policy will contribute to reducing the impacts to people and property in natural hazard events.</p>	<p>We seek that this submission be allowed.</p>

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Greater Wellington Regional Council	452.89	Retain NH-R1 (Additions to existing buildings and structures for activities least sensitive to natural hazards within the poorly constrained, uncertain constrained, well defined and well defined extension areas of the Fault Location Area) as notified.	Support	We support retaining NH-R1 as notified because the rule will reduce the impacts of natural hazard events on to people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.90, 452.91	NH-R2 - Seeks to replace reference to "fault line" with "fault trace".	Support	We support changing the wording to reference 'fault trace'. 'Fault trace' is a better descriptor than 'fault line' and is the standard geohazard terminology.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.92	Retain NH-R4 (New buildings and structures and the conversion of existing buildings for activities least sensitive to natural hazards within all areas of the Fault Location Area) as notified.	Support	We support retaining NH-R4 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.93	Seeks to delete the controlled activity status NH-R5(1) and make the rule entirely restricted discretionary. Replace reference to "fault line" with "fault trace".	Support	We support deleting the controlled activity status of NH-R5(1) and making the rule entirely restricted discretionary. Restricted discretionary is a more restrictive activity status and will be successful in reducing the impacts of natural hazard events on people and property. We also support changing the wording to reference 'fault trace'. 'Fault trace' is a better descriptor than 'fault line' and is the standard geohazard terminology.	We seek that this submission be allowed.
Greater Wellington	452.94	Retain NH-R6 (New buildings and structures and the conversion of existing buildings for activities potentially sensitive to natural	Support	We support retaining NH-R6 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.

Regional Council		hazards and activities most sensitive to natural hazards within the well-defined or well-defined extension areas of the Fault Location Area) as notified.			
Greater Wellington Regional Council	452.95	Retain NH-R7 (Activities to existing buildings and structures for activities least sensitive to natural hazards in the Flood Hazard Overlays) as notified, if NH-P8 is applied.	Support in part	We support NH-R7 if it meets NH-P8, however, we recommend strengthening the wording of the rule to specify that compliance with NH-P8 is required. This will reduce confusion and ensure the consistent application of rules and policies.	We seek that this submission be allowed; provided the following amendment is made: All Zones 1. Activity status: Permitted <u>where:</u> <u>Compliance is achieved with relevant matters in NH-P8.</u>
Greater Wellington Regional Council	452.97, 452.102	Amend NH-R9 and NH-R13.1 (Additions to existing buildings that contain activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Medium Flood Hazard Overlay and High Flood Hazard Overlay) as follows: Activity status: Permitted Where: a. The gross floor area of the addition is no more than 200m ² , and b. The addition does not result in the in the establishment of a residential activity on the ground floor of the building. <u>c. The impacts of the additions on the conveyance of flood waters, including any potential for flood</u>	Support	We support amending this rule to specify that the conveyance of flood waters must be considered. Flood waters must have unimpeded conveyance to avoid additional inundation and ponding, and to reduce the impacts of flood events on people and property. We note that several GWRC amendments use 'neighbouring' and 'adjacent' interchangeably and suggest one term be applied to ensure consistency across the plan.	We seek that this submission be allowed.

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		<u>waters to be blocked or diverted onto adjacent properties.</u>			
Greater Wellington Regional Council	452.98	Retain NH-R10.1 (New buildings and structures and the Conversion of existing buildings for activities least sensitive to natural hazards within the Low Flood Hazard Overlay) as notified.	Support in part	We support NH-R10 as it manages the risks from natural hazards and reduces the impacts of natural hazard events on people and property. However, we suggest strengthening the wording to include reference to NH-P9 to avoid confusion and ensure the consistent application of rules and policies.	We seek that this submission be allowed; provided the following amendment is made: All Zones 1. Activity status: Permitted <u>where:</u> <u>Compliance is achieved with relevant matters in NH-P9.</u>
Greater Wellington Regional Council	452.99	Retain NH-R11.1 (New buildings and structures and the conversion of existing buildings for activities least sensitive to natural hazards within the Medium Flood Hazard Overlay and High Flood Hazard Overlay) as notified.	Support	We support retaining NH-R11.1 as notified because the rule reduces the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.101	Retain NH-R12.2 (New buildings and structures and the conversion of existing building for activities most sensitive to natural hazards within the Low Flood Hazard Overlay) and notified.	Support	We support retaining NH-R6 as notified because the rule reduces the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.103	Amend NH-R14 (New buildings and the conversion of existing buildings for residential apartments within the Medium Flood Hazard Overlay and High Flood Hazard Overlay) to be only non-complying in status.	Support	We support changing the activity status for NH-R14 to non-complying. The provision as notified does not support the 'avoid' approach to natural hazard risk management and does not support a risk-based approach to development in flood prone areas. Amending this rule to be only non-complying in status reduces the impacts of flood events on people and property.	We seek that this submission be allowed.

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Greater Wellington Regional Council	452.104	Retain NH-R15 (Additions to existing buildings and structures for activities least sensitive to natural hazards and activities most sensitive to natural hazards in the Liquefaction Hazard Overlay) as notified.	Support in part	We support NH-R15 because the rule will reduce the impacts of natural hazard events on people and property. However, we recommend amending the rule to refer explicitly to NH-P11 to avoid confusion and ensure the consistent application of rules and policies.	We seek that this submission be allowed; provided the following amendment is made: All Zones: 1. Activity status: Permitted <u>Where:</u> a. <u>Meets the matters in NH-P11(4).</u>
Greater Wellington Regional Council	452.105	Retain NH-R16 (New buildings and structures and the conversion of existing buildings for activities least sensitive to natural hazards and activities potentially sensitive to natural hazards in the Liquefaction Hazard Overlay) as notified.	Support in part	We support NH-R16 because the rule will reduce the impacts of natural hazard events on people and property. However, we recommend amending the rule to refer explicitly to NH-P11 to avoid confusion and ensure the consistent application of rules and policies.	We seek that this submission be allowed; provided the following amendment is made: All Zones: 1. Activity status: Permitted <u>Where:</u> a. <u>Meets the matters in NH-P11(4).</u>
Greater Wellington Regional Council	452.106	Retain NH-R17 (New buildings and structures and the conversion of existing buildings for activities most sensitive to natural hazards in the Liquefaction Hazard Overlay) as notified.	Support	We support retaining NH-R17 as notified because the rule reduces the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.121	Amend SUB-O3 (Servicing of allotments) as follows: Development enabled through subdivision is adequately serviced and supported by infrastructure, <u>prioritising the use of green infrastructure where practicable</u> and the transport network.	Support	We support the inclusion of green infrastructure into this objective. Green infrastructure offers multiple benefits, including increased flood and climate change resilience in urban areas, reducing the impacts of flood events on people and property.	We seek that this submission be allowed.
Greater Wellington	452.126	Retain SUB-P22 (Subdivision of land in natural hazard risk areas) as notified.	Support in part	While we support SUB-P22, we recommend that guidance is developed to ascertain what likelihood and consequence level is deemed to require a more restrictive risk-based	We seek that this submission be allowed; provided that guidance is developed to ascertain what level of

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Regional Council				approach. This will aid the implementation of the policy and rules for both the Council and applicants.	likelihood and consequence requires a more restrictive risk-based approach.
Greater Wellington Regional Council	452.127	Retain SUB-R14.1 (Subdivision within the Low Flood Hazard Overlay) as notified.	Support	We support retaining SUB-R14.1 as notified because the rule will reduce the impacts of flood events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.128	Retain SUB-R14.2 (Subdivision within the Low Flood Hazard Overlay) as notified.	Support	We support retaining SUB-R14.2 as because the rule will reduce the impacts of flood events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.129	Retain SUB-R15.1 (Subdivision within the Medium Flood Hazard Overlay) as notified.	Support	We support retaining SUB-R15.1 as notified because the rule will reduce the impacts of flood events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.130	Retain SUB-R15.2 (Subdivision within the Medium Flood Hazard Overlay) as notified.	Support	We support retaining SUB-R15.2 as notified because the rule will reduce the impacts of flood events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.131	Retain SUB-R16.1 (Subdivision within the High Flood Hazard Overlay) as written.	Support	We support retaining SUB-R16.1 as notified because the rule will reduce the impacts of flood events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.132	Retain CE-O1 (Coastal Environment) as notified.	Support	We support retaining CE-O1 as notified because the objective will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.133	Retain CE-O2 (High, Very High and Outstanding Coastal Natural Character Areas) as notified.	Support	We support retaining CE-O2 as notified because the objective will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.

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Greater Wellington Regional Council	452.134	Retain CE-O3 (risk from Coastal Hazards in the High Tsunami Hazard Overlay and High Coastal Inundation Hazard Overlay) as notified.	Support	We support retaining CE-O3 as notified because the objective will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.135	Retain CE-O4 (Risk from Coastal Hazards in the Low Tsunami Hazard Overlay, Medium Tsunami Hazard Overlay, and Medium Coastal Inundation Hazard Overlay) as notified.	Support in part	We support objective CE-O4. However, we suggest that the wording “ <u>as low as reasonably practicable</u> ” is added, to ensure that natural hazard mitigation efforts are completed to a consistent and robust standard.	We seek that this submission be allowed; provided the following amendment is made: Subdivision, use and development within the Low Tsunami Hazard Overlay, Medium Tsunami Hazard Overlay, and Medium Coastal Inundation Hazard Overlay minimise the risk from natural hazards to people, buildings and infrastructure <u>to as low as reasonably practicable</u> .
Greater Wellington Regional Council	452.136	Retain CE-O5 (Subdivision, use and development in the General Industrial Zone and Heavy Industrial Zone in Seaview, Metropolitan Centre Zone in Petone and Seaview Marina Zone and within Medium and High Hazard Areas of the Coastal Hazard Area) as notified.	Support in part	We support objective CE-O5. However, we suggest that the wording “ <u>as low as reasonably practicable</u> ” is added, to ensure that natural hazard mitigation efforts are completed to a consistent and robust standard.	We seek that this submission be allowed; provided the following amendment is made: Provide for subdivision, use and development in the General Industrial Zone and Heavy Industrial Zone in Seaview, the Metropolitan Centre Zone in Petone and the Seaview Marina Zone while also ensuring development and use in this area minimises the risk from coastal hazards to people, buildings and infrastructure <u>to as low as reasonably practicable</u> .
Greater Wellington	452.137	Retain CE-O6 (Measures to reduce damage from sea level rise, coastal	Support	We support retaining CE-O6 as notified because the objective will reduce the impacts	We seek that this submission be allowed.

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Regional Council		inundation and coastal erosion) as notified.		of natural hazard events on people and property.	
Greater Wellington Regional Council	452.146	Retain CE-P8 (Risk-Based approach) as notified.	Support	We support retaining CE-P8 as notified because the policy will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.147	Retain CE-P9 (Levels of Risk) as notified.	Support in part	We support policy CE-P9. However, we suggest that the wording “ <u>as low as reasonably practicable</u> ” is added, to ensure that natural hazard mitigation efforts are completed to a consistent and robust standard.	We seek that this submission be allowed; provided the following amendments are made: 2. Within the General Industrial Zone and Heavy Industrial Zone in Seaview, Metropolitan Centre Zone in Petone and Seaview Marina Zone, recognise the regional importance of these areas, while ensuring that subdivision, use, or development located in these area minimises the risk from coastal hazards in the Medium and High Coastal Hazard Overlays to people, buildings, and infrastructure <u>to as low as reasonably practicable</u> . 3. Requiring subdivision, use, or development to minimise the risk to development from coastal hazards to people, buildings and infrastructure in the Low and Medium Coastal Hazard Overlays <u>to as low as reasonably practicable</u> ;
Greater Wellington Regional Council	452.148	Amend CE – P10 Coastal Environment (General) as follows: Maintain and enhance natural systems and features where they will reduce the existing risk posed	Support	We support the suggested amendments to this policy. Ensuring there are no adverse effects to natural systems, which are used for reducing risk, will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.

		by coastal hazards to people, buildings and infrastructure and <u>manage activities so that significant adverse effects on these systems or features are avoided and other adverse effects are avoided, minimised or remedied.</u>			
Greater Wellington Regional Council	452.149	Retain CE-P11 (Coastal hazard mitigation works) as notified.	Support	We support retaining CE-P11 as notified because the policy will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.150	Retain CE-P12 (Coastal hazard mitigation works involving green infrastructure) as notified.	Support	We support retaining CE-P12 as notified because the policy will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.151	Retain CE-P13 (Hard engineering coastal hazards mitigation works) as notified.	Support in part	<p>We support CE-P13, however, it has the potential to cause the unintended consequence of setting an expectation for hard protection works for private property, when other options may be available at a community scale (i.e., beyond the individual property scale). We recommend the New Zealand Coastal Policy Statement 2010 (NZCPS)¹ is reviewed and applied where relevant, particularly Policy 25(e) to discourage hard protection structures and promote the use of alternatives to them, including natural defences; and Policy 27 - Strategies for protecting significant existing development from coastal hazard risk.</p> <p>We recommend that an additional clause is added to this policy, as outlined on p. 70 of the NZCPS guidance (Policy 27(1)(d)), to make</p>	<p>We seek that this submission be allowed; provided the following amendment is made:</p> <p><u>6. Relevant matters to consider when assessing the environmental and social costs of permitting hard protection structures to protect private property include assessments of:</u></p> <p><u>a. the short- and long-term direct and indirect costs from the proposed hard protection structure.</u></p> <p><u>b. the impacts of sea-level rise and other climate change effects, and how long the proposed hard protection structure would be viable.</u></p> <p><u>c. the likelihood that more development (or development intensification) will be undertaken that relies on the hard</u></p>

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				<p>clear what the assessment matters should include. This is consistent with the approach taken for policies elsewhere in the Proposed Plan.</p> <p>¹NZCPS 2010 guidance note: Coastal hazards objective 5 and policies 24, 25, 26, & 27.</p>	<p>protection structures over the long term; and</p> <p><u>d. the impacts on communities (including future costs and liabilities for councils) associated with:</u></p> <p><u>i. any future abandonment of hard protection structures (particularly where constructed on public land); and</u></p> <p><u>ii. assistance to (and compensation actions by) private property owners in the event of failure of the hard protection structures and damage to private property.</u></p>
Greater Wellington Regional Council	452.152	Retain CE-P14 (Additions to existing buildings and structures within the Coastal Hazard Overlays) as notified.	Oppose	<p>We oppose retaining CE-P14 as notified. We suggest extensive amendments to the policy so that it will reduce the impacts of natural hazard events on people and property.</p> <p>For example, we support the intent of Policy 3d, 4d and 5b, as evacuation is a key mechanism to save lives in a tsunami. However, as detailed in our original submission¹, local source tsunami may arrive within 4-15 minutes, not within 30 minutes. We recommend Policy 3d is removed, as it sets an expectation that 30 minutes is enough time to evacuate, which is incorrect.</p> <p>Storm surge should be included in the renumbered 3d, as in addition to sea level rise, storm surge can also result in coastal inundation.</p> <p>¹NHC original submission on Hutt City Council Proposed District Plan.</p>	<p>We seek that this submission be disallowed, and the following amendments are made:</p> <p>3. Provide for additions to existing buildings and structures containing activities potentially sensitive to natural hazards or activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays where:</p> <p><u>a. The additions is of limited size, do not increase the Gross Floor Area by more than 25m².</u></p> <p><u>b. the additions are for a non-habitable room,</u></p> <p>b.c. <u>c. The addition enables the continued use of the existing building,</u></p> <p>ed. <u>d. The addition incorporates measures that minimise the risk to people and buildings from coastal inundation from</u></p>

					<p>sea level rise and storm surge to as low as reasonably practicable, and</p> <p>d. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</p> <p>4. Provide for additions to existing buildings and structures containing activities potentially sensitive to natural hazards in the High Coastal Hazard Overlays where:</p> <p><u>a. The additions do not increase the Gross Floor Area by more than 25m²,</u></p> <p><u>b. the additions are for a non-habitable room,</u></p> <p>ab. The addition enables the continued use of the existing building,</p> <p>bc. The addition incorporates measures that reduce or do not increase the <u>existing</u> risk to people and buildings from coastal inundation from sea level rise and storm surge, and</p> <p>cd. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</p> <p>5. Only allow for additions to existing buildings and structures containing activities most sensitive to natural hazards in the High Coastal Hazard Overlays where:</p>
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					<p>a. The additions do not increase the Gross Floor Area by more than 25m²,</p> <p>b. the additions are for a non-habitable room.</p> <p>ab. The addition incorporates measures that reduce or do not increase the <u>existing</u> risk to people and buildings from the coastal hazard, and</p> <p>b. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</p>
Greater Wellington Regional Council	452.153	Retain CE-P15 (Subdivision, Use and Development within the Coastal Hazard Overlays) as notified.	Oppose	<p>We oppose retaining CE-P15 as notified. We suggest extensive amendments to the policy so that will reduce the impacts of natural hazard events on people and property.</p> <p>For example, we support the intent of Policy 4d, 5d, 6b, 8c and 9b(iii), as evacuation is a key mechanism to save lives in a tsunami. However, as outlined in our original submission¹, local source tsunami may arrive within 4-15 minutes, not within 30 minutes. We recommend Policy 4d is removed, as it sets an expectation that 30 minutes is enough time to evacuate, which is incorrect.</p> <p>1NHC original submission on Hutt City Council Proposed District Plan.</p>	<p>We seek that this submission be allowed; provided the following amendments are made:</p> <p>4. Provide for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Medium and High Coastal Hazard Overlays when located in the General Industrial Zone in Seaview, the Heavy Industrial Zone in Seaview, the Metropolitan Centre Zone in Petone and the Seaview Marina Zone where:</p> <p>a. The building or structure does not exceed an appropriate 200m² gross floor area,</p> <p>b. The building or structure incorporates measures that minimise the risk to people and buildings from</p>

					<p>coastal hazards <u>to as low as reasonably practicable</u>,</p> <p>c. If the building is a Major Hazardous Facility, measures that minimise the risk from the release of hazardous goods from a coastal hazard are incorporated into the design of the building or the storage of the hazardous goods,</p> <p>d. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture, and</p> <p>e. The impact of any local government or central government planned climate change adaptation methods on the hazard susceptibility of the development has been considered.</p> <p>5. Provide for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards in the Medium Coastal Hazard Overlays in all other zones where:</p> <p>a. The new building incorporates measures that minimise the risk to people and buildings from the coastal hazard <u>to as low as reasonably practicable</u>, and</p> <p>b. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</p>
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					<p>6. Only allow for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards in the High Coastal Hazard Overlays in all other zones where:</p> <ul style="list-style-type: none"> a. The new building incorporates measures that reduce or do not increase the existing risk to people and buildings from the coastal hazard, and b. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture. <p>7. ...</p> <p>8. Only allow for new buildings and structures, building platforms and the conversion of existing buildings containing activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays in all other zones where:</p> <ul style="list-style-type: none"> a. The new building incorporates measures that minimise the risk to people and buildings from the coastal hazard <u>to as low as reasonably practicable</u>, b. The new development does not involve or require the removal or modification of a natural system or feature that provides protection to other properties from the natural hazard, and c. There is the ability to access safe pedestrian evacuation routes for
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					<p>occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</p> <p>9. Avoid new buildings and structures, building platforms and the conversion of existing buildings containing activities most sensitive to natural hazards in the High Coastal Hazard Overlays in all zones (excluding the General Industrial Zone in Seaview, the Heavy Industrial Zone in Seaview, the Metropolitan Centre Zone in Petone and the Seaview Marina Zone) unless:</p> <p>For activities that have <u>There is</u> an operational need and functional need to locate or occur within the High Coastal Hazard Overlays and locating or occurring outside these areas is not a practicable option: <u>and</u></p> <ul style="list-style-type: none"> i. <u>b.</u> Mitigation measures are incorporated to minimise the risk of damage to buildings and loss of life to people associated with the activity, or b. <u>For any other activities:</u> <ul style="list-style-type: none"> i. <u>The new building, building platform or conversion of the building does not increase the risk to life, or</u> ii. <u>The new building, building platform or conversion of the building incorporates measures that minimise the risk to people and buildings from the coastal hazard,</u>
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					<p>iii. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture;</p> <p>iv. The new building, or building platform does not involve or require the removal or modification of a natural system or feature that provides protection to other properties from the natural hazard.</p>
Greater Wellington Regional Council	452.161	Retain CE-R8 (Additions to existing buildings and structures for activities least sensitive to natural hazards in all Coastal Hazard Overlays) as notified.	Support	We support retaining CE-R8 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.162	Retain CE-R9 (Additions to existing buildings and structures for activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Low Tsunami Hazard Overlay) as notified.	Support	We support retaining CE-R9 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.163	Retain CE-R10 (Additions to existing buildings and structures for activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays) as notified.	Support	We support retaining CE-R10 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.

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Greater Wellington Regional Council	452.164	Retain CE-R11 (Additions to existing buildings and structures for activities potentially sensitive to natural hazards in the High Coastal Hazard Overlays) as notified.	Support	We support retaining CE-R11 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.165	Retain CE-R12 (Additions to existing buildings and structures for activities most sensitive to natural hazards in the High Coastal Hazard Overlays) as notified.	Support	We support retaining CE-R12 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.166	Retain CE-R13 (New buildings and structures and the conversion of existing buildings for activities least sensitive to natural hazards in the Coastal Hazard Overlays) as notified.	Support	We support retaining CE-R13 as notified because the policy will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.167	Retain CE-R14 (Conversion of existing buildings for activities potentially sensitive to natural hazards in the Coastal Hazard Overlays) as notified.	Support	We support retaining CE-R14 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.168	Retain CE-R15 (New buildings and structures for activities potentially sensitive to natural hazards in the Coastal Hazard Overlays) as notified.	Support	We support retaining CE-R15 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.169	Retain CE-R16 (New buildings and structures and the conversion of existing buildings for activities most sensitive to natural hazards in the Coastal Hazard Overlays) as notified.	Support	We support retaining CE-R16 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.

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Greater Wellington Regional Council	452.170	Retain CE-R17 (Green Infrastructure in the Coastal Hazard Overlays) as notified.	Support	We support retaining CE-R17 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.171	Retain CE-R18 (Hard engineering coastal hazard mitigation works in all areas of the Coastal Hazard Overlay) as notified.	Support	We support retaining CE-R18 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.175	Retain EW-P5.1, 2 and 3 (Earthworks associated with Natural Hazard Mitigation Works) as notified.	Support	We support retaining EW-P5 as notified because the policy will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.176	Amend EW-P6 (Earthworks within Flood Hazard Overlays). Amend as follows: Provide for earthworks in Flood Hazard Overlays where <u>there is no increase in existing risk to neighbouring properties</u> by...	Support in part	We agree there should be no increase in risk to neighbouring properties because of diverted flood waters. However, we also recommend specifying that flood risk must be reduced. Existing levels of risk should not be used to justify policies when there are opportunities to reduce risk. We note that several GWRC amendments use 'neighbouring' and 'adjacent' interchangeably and suggest one term be applied to ensure consistency across the plan.	We seek that this submission be allowed; provided the following amendment is made: Provide for earthworks in Flood Hazard Overlays <u>where flooding risk for neighbouring properties is reduced or not increased by...</u> there is no increase in existing risk to neighbouring properties by...
Greater Wellington Regional Council	452.177	Amend EW-P7 (Earthworks on slopes). Amend as follows: On slopes greater than 34 degrees, where the 34 degree slope angle is sustained over a distance of at least 3m, measured horizontally, provide for earthworks <u>that have a functional use or functional need</u>	Support in part	We agree that the wording needs to be updated to link it more clearly to the earthworks standard EW-S3. However, we also recommend changes to the wording to make it clear that risk should be reduced or not increased.	We seek that this submission be allowed; provided the following amendments are made: On slopes greater than 34 degrees, where the 34 degree slope angle is sustained over a distance of at least 3m, measured horizontally, provide for earthworks where a geotechnical assessment confirms that:

		<p>where a geotechnical assessment confirms that:</p> <p>1. The proposed earthworks will minimise the risk from slope instability to people and buildings, and</p> <p>2. The proposed earthworks will not increase the risk of slope failure on adjacent sites.</p>			<p>1. The proposed earthworks will minimise <u>reduce or not increase</u> the risk from slope instability to people and buildings, and</p> <p>2. The proposed earthworks will <u>reduce or</u> not increase the risk of slope failure on adjacent sites.</p>
Greater Wellington Regional Council	452.178	Retain EW-P8 (Earthworks in the Slope Assessment Overlay) as notified.	Support in part	<p>We agree that the wording needs to be updated to link it more clearly to the earthworks standard EW-S3. However, we also recommend changes to the wording to make it clear that risk should be reduced or not increased.</p>	<p>We seek that this submission be allowed; provided the following amendments are made:</p> <p>On slopes greater than 34 degrees, where the 34 degree slope angle is sustained over a distance of at least 3m, measured horizontally, provide for earthworks where a geotechnical assessment confirms that:</p> <p>1. The proposed earthworks will minimise <u>reduce or not increase</u> the risk from slope instability to people and buildings, and</p> <p>2. The proposed earthworks will <u>reduce or</u> not increase the risk of slope failure on adjacent sites.</p>
Greater Wellington Regional Council	452.182	Retain EW-R6 (Earthworks within Flood Hazard Overlays) as notified.	Support in part	<p>We support EW-R6 because it can reduce the impacts of flood events on people and property. However, we recommend strengthening the wording to ensure that residual risk and risk of flooding to other properties is being managed.</p>	<p>We seek that this submission be allowed; provided the following amendments are made:</p> <p>Earthworks within Flood Hazard Overlays All Zones 1. Activity status: Permitted Where:</p>

					<p>a. <u>The risk from flooding is not increased in adjacent properties; and either</u></p> <p>b. a: The earthworks are located within the low hazard area of the Flood Hazard Overlay, or</p> <p>c. b: The earthworks are located within a medium hazard area, or high hazard area of the Flood Hazard Overlay and, the finished ground level upon the completion of the earthworks are the same as the natural ground level at the start of the earthworks.</p>
Greater Wellington Regional Council	452.183	Retain EW-R7 (Earthworks on Community Scale Natural Hazard mitigation Structures) as notified.	Support	We support retaining EW-R7 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.184	Retain EW-R8 (Earthworks for a building platform in the Slope Assessment Overlay) and notified.	Support	We support retaining EW-R8 as notified because the rule will reduce the impacts of natural hazard events on people and property.	We seek that this submission be allowed.
Greater Wellington Regional Council	452.189a, 452.189f	<p>Residential Zones – All zones.</p> <p>Seeks to add new objectives, policies, rules and standards, or add these to each zone tailored to the context of the specific zone, and/or include these in a different section of the DP as appropriate, to the following effect:</p> <p><u>Objective XX: Building and infrastructure is designed so that they are able to withstand predicted future higher temperatures.</u></p>	Support	<p>We support the addition of a new objective to manage the future effects of climate change, including increased temperatures.</p> <p>Accommodating for climate change can reduce the impacts to people and property in natural hazard events as climate change is expected to exacerbate natural hazards.</p>	We seek that this submission be allowed.

		<u>intensity and duration of rainfall and wind over the anticipated life span and to mitigate these effects on people, communities and the natural environment.</u>			
Sensible Solutions for Eastbourne	383.4a, 383.22a	Remove the hazard overlays until better data can be provided.	Oppose	<p>We oppose removing Hazard Overlays from the District Plan. The inclusion of Hazard Overlays in District Plans can be used to reduce risk (through a reduction in exposure) by managing development in areas prone to natural hazards. Hutt City is exposed to a range of natural hazards including ground shaking, fault rupture, liquefaction, tsunami, slope instability, tectonic subsidence, flooding, coastal inundation, storm surge, the impacts from sea level rise, and wildfire. Therefore, to reduce the impact to people and property in natural hazard events, Hazard Overlays must remain within the District Plan and be used to manage development.</p> <p>The Hazard Overlays provided by Hutt City Council, represent the best available information at present. They account for climate change and sea level rise which is essential because a changing climate will change the impacts of natural hazard events, by exacerbating flooding and coastal inundation. NHC recognises that hazard modelling does contain uncertainty, however, this is not a justifiable reason to remove Hazard Overlays from the District Plan, instead a precautionary approach should be used to accommodate for any uncertainties within hazard modelling and mapping.</p>	We seek that this submission be disallowed.

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				Including the hazard overlays within the Plan will provide information certainty for resource consent applicants.	
Sensible Solutions for Eastbourne	383.4c	Seeks that "the requirement within Medium Flood Hazard overlays for all subdivision, use and development to provide for unimpeded and unobstructed conveyancing of flood waters" is removed.	Oppose	We oppose removing the requirement for unimpeded and unobstructed conveyance of flood waters. Flood waters must have the ability to flow unobstructed to avoid additional impacts from inundation and ponding in flood events. Areas where flood waters will naturally flow in flood events, represent areas of high hazard, so any structures that impede or obstruct these flows are likely to have more severe damage during a flood event. Therefore, to reduce the impacts to people and property in flood events subdivision, use, and development must provide for unimpeded and unobstructed conveyance of flood waters.	We seek that this submission be disallowed.
Sensible Solutions for Eastbourne	383.4d, 383.22c	Seeks that new rules that apply to low hazard and medium hazard sites are removed.	Oppose	We oppose the removal of new rules that apply to Low and Medium Hazard Areas. Hutt City is exposed to a range of different natural hazards including ground shaking, fault rupture, liquefaction, tsunami, slope instability, tectonic subsidence, flooding, coastal inundation, storm surge, the impacts from sea level rise, and wildfire. Rules to manage development in Low and Medium Hazard Areas are essential to reduce risk and reduce the impacts of natural hazard events on people and property.	We seek that this submission be disallowed.
Sensible Solutions for Eastbourne	383.5a	Seeks that, there is recognition in the District Plan that flood risk exists and some areas historically have been affected, but do not place any Flood Hazard Overlay	Oppose in part	We support the District Plan recognising that flood risk exists in Hutt City but oppose the removal of Flood Hazard Overlays from the District Plan. Flood Hazard Overlays are essential for managing development in hazard	We seek that this submission be disallowed.

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		(inferred) on individual properties (relief sought in submission points 383.5 is presented as an "alternative solution" to relief sought in submission points 383.4 - refer to original submission).		areas and reducing the impacts of flood events on people and property.	
Sensible Solutions for Eastbourne	383.5c	Delete rule (inferred) NH-R8 (Additions to existing buildings and structures for activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Low Flood Hazard Overlay).	Oppose	We oppose removing NH-R8. This rule contributes to managing development in the Low Flood Hazard Overlay to reduce the impacts of flood events on people and property. Climate change is expected to bring more intense and frequent rainfall event to the Wellington Region, which can exacerbate the effects of flooding, and will require effective management.	We seek that this submission be disallowed.
Sensible Solutions for Eastbourne	383.6	Remove Slope Assessment Overlay.	Oppose	We oppose removing the Slope Assessment Overlay. Hazard overlays within the District Plan are an essential way to manage development and reduce natural hazard risk (through reductions in exposure). Landslides in Hutt City could be caused by earthquakes, storms, earthworks, or have no obvious trigger. Landslides triggered by storm events are likely to become more frequent, as climate change is projected to cause more frequent and intense rainfall to the Wellington Region. To reduce the impacts to people and property in natural hazard events the Slope Assessment Overlay must remain in the District Plan.	We seek that this submission be disallowed.
Sensible Solutions for Eastbourne	383.7	Seeks that the extent of the Slope Assessment Overlay is reduced to	Oppose	We oppose replacing the Slope Assessment Overlay with only high-risk stability areas. The Slope Assessment Overlay provided can be used to effectively manage development and	We seek that this submission be disallowed.

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		high-risk stability areas only by consultation.		<p>reduce natural hazard risk (through reductions in exposure). Landslides in Hutt City could be caused by earthquakes, storms, earthworks, or have no obvious trigger. Landslides triggered by storm events are likely to become more frequent, as climate change is projected to cause more frequent and intense rainfall to the Wellington Region.</p> <p>Further, NH-P12 requires additional geotechnical assessments to take place to understand slope hazard on a property specific scale. This means that development and subdivision in the Slope Assessment Overlay requires consultation with a geotechnical expert as per the requested relief sought from Sensible Solutions for Eastbourne.</p>	
Sensible Solutions for Eastbourne	383.22b	Seeks that policy is amended as it is "impracticable for private owners to convert to above 1% AEP" (refer to original submission).	Oppose	<p>We oppose amendments to NH-P9 to remove mention of 1% AEP flood events. NH-P9 does not apply to existing buildings or properties, it only applies in the case of subdivision, new buildings or structures, and conversion of existing buildings. Therefore, existing private owners would not be required to convert their properties to 1% AEP mitigations measures. Further, planning requirements for a 1% AEP flood event are considered a precautionary approach and can reduce the impacts to people and property in flood events. Planning for 1% AEP events is also becoming standard in New Zealand with Wellington City Council, Auckland Council, and Whangārei District Council also adopting rules for a 1% AEP flood.</p>	We seek that this submission be disallowed.

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Sensible Solutions for Eastbourne	383.24	Seeks that the Coastal Inundation Hazard Overlay, as it relates to Muritai areas, is removed or amended.	Oppose	We oppose removing or amending the Coastal Inundation Hazard Overlay. This Overlay includes both coastal inundation and inundation from tsunami, which means managing development within this Overlay will reduce the impacts to people and property in natural hazard events. The Overlay also accounts for climate change, through incorporating allowances for projected sea level rise, therefore, making this Overlay essential for managing natural hazard risk in Hutt City.	We seek that this submission be disallowed.
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