# To the Planning Team, Auckland Council

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Date: 16 December 2025

Thank you for the opportunity to submit on Plan Change 120: Housing Intensification and Resilience (PC120).

## About the Natural Hazards Commission Toka Tū Ake (NHC)

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

- building and land damage from earthquakes, landslides, tsunami, volcanic and hydrothermal activity, and fire following these hazards, and
- land damage only from storm or flood and fire following these hazards.

## Why NHC is providing this submission

NHC's primary objective is to *'reduce the impact of natural hazards on people, property, and the community'*. To achieve this objective, NHC's functions, as set out in the NHI Act, include facilitate research and education, and contribute to the sharing of information, knowledge, and expertise (with the Crown, public and private entities, and the public generally), including in relation to:

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

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

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

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

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

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

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

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

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

Auckland is exposed to a range of different natural hazards, including volcanic activity, coastal erosion and inundation, tsunami, and flooding. The 2023 Auckland Anniversary Weekend flooding demonstrated how severe weather can impact the city by causing extreme flooding and landsliding affecting people and property.

NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. We are generally supportive of the approach taken in PC120 including the development of risk thresholds and the definitions of natural hazards and hazard sensitive activities.

Our submission only provides feedback on provisions where we request amendments or suggested improvements (detailed in Appendix 1). As part of our submission, we recommend retaining hazard maps within the Unitary Plan, rather than having them in a separate GIS viewer. While we appreciate the proposed innovative approaches for managing issues associated with certainty for plan users, and

maintaining statuary weight for hazard maps, NHC believes that the best way to make sure maps, data, and information are used for decision-making is to ensure they are explicitly included within plans. We recognise the challenges associated with keeping maps within the Unitary Plan and updating information regularly, however we are hopeful that new measures in the RMA reforms may make this process easier and more streamlined.

Another key recommended improvement is revising the risk thresholds used throughout the plan. While we are very supportive of assessing risk tolerance and implementing risk thresholds to support effective risk-based planning, more clarity is required for the terms 'potentially tolerable' and 'tolerable'.

These terms are used throughout the plan change with different meanings. This is made more challenging with no definition or explanation for 'tolerable' provided, which could lead to inconsistencies in how rules and policies are applied. Further, the term 'potentially tolerable' could cause confusion or be misinterpreted. For example, it is not clear whether it is referring to risks that are already tolerable; those that are acceptable but with the potential to increase to tolerable levels; those that are significant with the potential to decrease to tolerable levels (i.e. through mitigations); or all three. It is possible for both 'tolerable' and 'potentially tolerable' to be used (example provided in Table 1), but they should be clearly explained and distinguished to avoid confusion and support the consistent application of rules and policies.

*Table 1. Examples of different risk thresholds and how 'tolerable' and 'potentially tolerable' risk could be used together.*[1]

| **Term** | **Definition** | **Example** |
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| Significant | Risk cannot be justified except in extraordinary circumstances. | A site that has recently been flooded and is likely to have dangerous levels of flood depth and velocity in a 1% AEP event. The residual risk is also considered significant. |
| Tolerable | Risk is accepted only if the benefit gained is shown to outweigh the risk (using the 'As Low As Reasonably Practicable' principle). | A development where coastal planting and dune stabilisation is required and being implemented to manage coastal inundation risks. This can be completed at a cost proportional to the benefit gained from development. |

[1] Adapted from: Natural Hazards Commission Toka Tū Ake. (2025). *Risk tolerance methodology*. https://www.naturalhazards.govt.nz/resilience-and-research/research/search-all-research-reports/risk-tolerance-methodology/

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| Potentially Tolerable | Risk that is currently acceptable or significant and is likely to change to become tolerable. | A proposed development where the risk is currently significant. However, more information about the cost of mitigation could be used to understand whether mitigation could bring the risk down to a tolerable level, at a cost proportionate to the benefit gained.<br><br>A proposed development where the risk is currently acceptable. However, with the impacts of climate change, the site could potentially move from acceptable to tolerable. |
| Acceptable | Broadly acceptable. | A proposed development outside of any mapped natural hazard areas. |

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

Yours sincerely,

Sarah-Jayne McCurrach,

Head of Risk Reduction, NHC

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

**Natural Hazards Commission Toka Tū Ake Submission on Plan Change 120: Housing Intensification and Resilience**

**To:** Auckland Council

Via Council submission email: unitaryplan@aucklandcouncil.govt.nz

**Submitter:** Natural Hazards Commission Toka Tū Ake (NHC)

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**1. This is a submission on the following:**

The Plan Change 120: Housing Intensification and Resilience notified on 03/11/2025.

**2. NHC could not gain an advantage in trade competition through this submission.**

**3. NHC does not wish to be heard in support of this submission.**

**4. This document and the attached Appendices comprise the NHC submission. This submission relates to Plan Change 120: Housing Intensification and Resilience in its entirety.**

**5. The submission from NHC is:**

NHC supports, is neutral, and opposes the Plan Change 120: Housing Intensification and Resilience to the extent outlined in this submission.

a) **Identification of all relevant natural hazards** - NHC generally supports the range of natural hazards identified in the Unitary Plan but seeks inclusion of low probability, high consequence events such as earthquakes and tsunami. Auckland is exposed to these hazards, and they should be included within the Unitary Plan with supporting provisions to reduce the risks associated with these natural hazards.

b) **Development of risk tolerance thresholds** - We support developing clear risk thresholds for significant, tolerable, and acceptable levels of risk. This supports a risk-based approach and supports reducing impacts to people and property. However, we recommend being consistent with the terms 'tolerable' and 'potentially tolerable' and providing further explanations of the terms as noted in our cover letter and throughout Appendix 1.

c) **Natural Hazard Mapping/Overlays** - NHC opposes removing natural hazard mapping from the Unitary Plan as we believe retaining hazard maps within the Plan is the most effective way to ensure maps, data, and information are used for decision-making. Removal of hazard maps from the Unitary Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used.

   Retaining hazard maps within the plan also has positive implications for natural justice. The first fundamental principle of natural justice is that affected parties should be given the

opportunity to be heard. Having natural hazard maps outside the Unitary Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a Unitary Plan change.

Provided at Appendix 1 is a table containing submission points that address the above, and other matters of relevance.

**6. NHC seeks the following decision from the local authority:**

That the specific amendments, additions or retentions which are sought as specifically outlined in Appendix 1, are accepted and adopted into Plan Change 120: Housing Intensification and Resilience, including such further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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| Date: | 16/12/2025 |
| Address for service: | Natural Hazards Commission Toka Tū Ake<br>PO Box 790,<br>Wellington<br>6140 |
| Contact person: | Sarah-Jayne McCurrach, Head of Risk Reduction |
| Email: | resilience@naturalhazards.govt.nz |

## Appendix 1

| Provision | Description | Support/ Oppose/ Amend | Reasoning | Requested Action |
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| **Chapter E Auckland-wide – Natural hazards and flooding** | | | | |
| Background | Some risks from events with low probability but high potential impact (e.g. volcanic activity, tsunamis and earthquakes) are unlikely to be addressed through land use planning and may be better addressed through mechanisms outside of the Plan, such as measures put in place by emergency management groups | **Oppose** | Volcanic Activity presents a unique challenge in Auckland as the nature of the Auckland Volcanic Field means it is unknown where the next event will occur[1]. This means it is hard to implement land use planning provisions to avoid volcanic hazards. However, other low probability events such as earthquakes and tsunami can be managed through land use planning.<br><br>We recognise that Auckland has lower seismic risk than other locations in New Zealand, however, this does not mean that there is no seismic risk. There are fault lines in proximity to Auckland, such as the Wairoa North Fault, that could rupture and cause secondary hazards (landslides and liquefaction) and a range of impacts across Auckland[2]. There are also fault lines within the Auckland region (Paerata, Pukekohe) that should be managed following the MfE Guidance for Planning for Development of Land on or Close to Active Faults[3].<br><br>Additionally, all of New Zealand's coastline is exposed to tsunami[4]. There are some land uses and activities, such as retirement villages and schools, that are extremely vulnerable to tsunami and can be manged through land use planning to reduce impacts to people and property. GNS Science has produced guidance for risk-based land use planning for tsunami that should be used to inform provisions for tsunami risk[5]. There are also Civil Defence and Emergency Management Director's Guidelines for | The Council includes clear provisions to manage low probability, high consequence events within the Unitary Plan.<br><br>Active Faults within the Auckland region should be managed according to MfE Active Fault Guidelines.<br><br>Tsunami risk should be managed according to the 2019 GNS Science guidance 'Integrating tsunami inundation modelling into risk-based land use planning' and CDEM Director's Guidelines. |

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| | | | tsunami readiness and response that should be used to guide tsunami risk management[6].<br><br>[1]Deligne, N. L. et al. (2017). Investigating the consequences of urban volcanism using a scenario approach I: Development and application of a hypothetical eruption in the Auckland Volcanic Field, New Zealand. *Journal of Volcanology and Geothermal Research, 336,* 192–208. ttps://doi.org/10.1016/j.jvolgeores.2017.02.023<br><br>[2]Counsins, W. J., Deligne, N. I., & Nayyerloo, M. (2014). Estimated damage and causalities from earthquakes affecting Auckland. GNS Science Consultancy Report 2013/324<br><br>[3]Ministry for the Environment (2003). Planning for Development of Land on or Close to Active Faults.<br><br>[4]National Emergency Management Agency (NEMA). Consistent messaging for Civil Defence and Emergency Management.<br><br>[5]Beban, J., Gunnell, S., & Saunders, W. S. A. (2019). *Integrated tsunami inundation modelling into risk-based land-use planning: An update of guidance* (GNS Science miscellaneous series 132). GNS Science. https://doi.org/10.21420/6MGN-4T72<br><br>[6]National Emergency Management Agency. Director's Guidelines. Last updated November 2025. | |
| E36.2 Objectives | (3A) The risk from natural hazards to people, property, infrastructure and the environment resulting from existing use and development across the region is reduced over time to a tolerable or acceptable level. | **Support with amendments** | We support these objectives as they support a risk-based approach. Conducting a risk tolerance assessment and establishing clear risk thresholds can effectively manage significant risk and reduce impacts to people and property. We also support specifying that risk is reduced | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term |

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| | (3B) New subdivision, use and development avoids significant risk and only occurs when the risk from natural hazards to people, property, infrastructure and the environment is assessed as being tolerable or acceptable. | | overtime, as this can support the management of legacy planning issues.<br><br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk (as per our cover letter feedback), to support the clear and consistent implementation of rules and policies. | 'potentially tolerable' is provided. |
| E36.3 Policies [rp/dp]<br><br>Risk Classifications | (1A) Identify risk from natural hazards associated with subdivision, use and development by differentiating risk into the following three classifications:<br><br>a) significant<br><br>b) potentially tolerable<br><br>c) acceptable | **Support with amendments** | We support providing risk classifications to manage natural hazard risk. This supports a risk-based approach and can support avoiding the most significant risks, which can reduce impacts to people and property in natural hazard events. We also support the method that was used by Auckland Council to establish these classifications. Engaging with the community is essential for ensuring classifications and subsequent risk management techniques, represent the values of those that are affected by the risk.<br><br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, to support the clear and consistent implementation of rules and policies.<br><br>We also recommend adjusting the wording so that the policy refers to 'risks' rather than just 'risk'. Using 'risks' ensures all possible risks from natural hazards (e.g. Life safety risk, building risk etc.) are considered and managed. This supports effective hazard risk management and can reduce impacts to people and property. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. That the following amendment is made:<br><br>(1A) Identify ~~risk~~ risks from natural hazards associated with subdivision, use and development by differentiating risk into the following three classifications: |
| Table E36.3.1B.1 Subdivision, use and development within existing | - | **Support with amendments** | We support providing a table to determine 'default levels of risk' for activities in Auckland. This supports a risk-based approach and can reduce impacts to people and property. However, we recommend more clarity, and consistency is applied when risks are referred to as 'potentially tolerable' or 'tolerable' as per our cover letter | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term |

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| urbanised areas | | | feedback, to support the clear and consistent implementation of rules and policies. | 'potentially tolerable' is provided. |
| E36.3 Policies [rp/dp]<br><br>Risk settings and management methodology | (1D) Ensure that subdivision, development and vegetation management mitigate wildfire hazards to as low as reasonably practicable | **Support with amendments** | We support requiring wildfire hazards to be as low as reasonably practicable as this can reduce the impacts to people and property. Wildfire is a hazard that is likely to become more frequent and intense in the future with the effects of climate change. The provisions related to wildfire could be more detailed and specific to support the consistent application of rules and policies and to more effectively contribute to reducing impacts to people and property. An example from proposed Rotorua Plan Change 8 provides detailed provisions that could be used as a basis improving these provisions:<br><br>*Mitigate the risks of wildfire associated with development by:*<br><br>*1. Requiring firefighting water supply for activities in more densely populated zones and papakāinga to reduce the risk of wildfire occurring.*<br><br>*2. Encouraging subdivision design in rural areas and at the rural-urban fringe to consider the potential risks of wildfire and, where appropriate, include measures that may help reduce the risks. Such measures may include:*<br><br>*a. identifying suitable locations for building platforms and accessways that reduce exposure to wildfire hazards and facilitate egress;*<br><br>*b. facilitating access for emergency services; and*<br><br>*c. choice of plant species to reduce the risk of fire.* | Make the following amendments:<br><br>(1D) Ensure that subdivision, development and vegetation management mitigate wildfire hazards to as low as reasonably practicable by:<br><br>1. Requiring firefighting water supply for activities in more densely populated zones and papakāinga to reduce the risk of wildfire occurring.<br><br>2. Encouraging subdivision design in rural areas and at the rural-urban fringe to consider the potential risks of wildfire and, where appropriate, include measures that may help reduce the risks. Such measures may include:<br><br>a. identifying suitable locations for building |

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| | | | | platforms and accessways that reduce exposure to wildfire hazards and facilitate egress;<br><br>b. facilitating access for emergency services; and<br><br>c. choice of plant species to reduce the risk of fire. |
| E36.3 Policies [rp/dp]<br><br>Risk assessment requirements | Where a resource consent is necessary, require proposals to subdivide, use or develop land that is subject to natural hazards to prepare a risk assessment that considers all of the following, taking into account the potential effects of climate change and adopting a precautionary approach where information is uncertain or incomplete:<br><br>(aa) the type, frequency, range and scale of the natural hazard(s), including:<br><br>(i) where there may be coinciding, compounding and/or cascading hazards;<br><br>(ii) whether the hazard risks will be temporary or permanent;<br><br>(iii) whether natural hazard events of lower intensity and higher frequency than the 1 per cent AEP event will impact the property and proposed activity | **Support with amendments** | We support these requirements for a risk assessment. Assessing the likelihood and consequence of an event support a risk-based approach and effective management of natural hazards.<br><br>We also support the explicit reference to 'residual risk'. Considering residual risk is essential for effective risk management, as it ensures that activities are only permitted when there is an acceptable or tolerable level of risk even once risk treatment or mitigations options are in place.<br><br>We recommend using the term 'cumulative' hazards rather than 'coinciding' hazards. Cumulative hazards is a term used and defined within the Auckland Council Risk Communication Toolbox[1], which according to the s32 was used to inform PC120. Further, 'coinciding' is not defined anywhere in PC120. Using 'cumulative' would therefore support the consistent use of terms and can contribute to effective natural hazards management. | The following amendment is made:<br><br>(i) where there may be ~~coinciding,~~ cumulative, compounding and/or cascading hazards; |

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| | (c) the consequences of a natural hazard event in relation to the proposed activity;<br><br>(l) existing and proposed mitigation measures;<br><br>(m) residual risk;<br><br>(n) any relevant management plan, strategy or hazard risk assessment relating to the area. | | [1]Auckland Council. (2014). *Natural hazard risk communication toolbox: Natural hazard risk management action plan*. Auckland Council. | |
| E36.3 Policies [rp/dp]<br><br>Management of risk for existing use and development | (4C) Enable adaptation of existing activities and/or the continued use of existing buildings and infrastructure in natural hazard areas where risk is maintained at, or reduced as far as reasonably practicable to, a tolerable or acceptable level, including by:<br><br>a) relocating or extending the building or structures only in areas of the site that are outside of natural hazard areas;<br><br>b) improving the resilience of the building or structure;<br><br>c) reducing the intensity of activity;<br><br>d) changing the use to a less sensitive activity;<br><br>e) limiting the duration of the activity;<br><br>f) in flood hazard and coastal inundation hazard areas:<br><br>(i) ensuring appropriate safe refuge and safe egress are provided where possible and maintained where currently available;<br><br>(ii) raising floor levels to reduce the extent of flooding or inundation within the building. | **Support with amendments** | We support these considerations for existing use and development. Existing use and legacy planning issues present a particular challenge for hazard risk management as it can be difficult to prevent development and reduce risk in these locations. These provisions can support effective adaptation in the future and reduce the impacts to people and property.<br><br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. |

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| | (4D) Require re-building of materially damaged or destroyed buildings in natural hazard areas to demonstrate that the natural hazard risk is reduced to a tolerable or acceptable level, or otherwise reduced to as low as reasonably practicable (compared with the previous natural hazard risk to both the building and use of the building on the site). | | | |
| E36.3 Policies [rp/dp]<br><br>Coastal Hazards – within existing urbanised areas | (5H) Avoid new subdivision, use and development in existing urbanised areas that gives rise to significant coastal hazard risk in accordance with Table E36.3.1B.1.<br><br>(5I) Manage new subdivision, use and development in existing urbanised areas that gives rise to potentially tolerable coastal hazard risk in accordance with Table E36.3.1B.1 so that risk is maintained at a tolerable level by:<br><br>a) providing appropriate safe refuge and safe egress for activities sensitive to natural hazards [A], unless it can be demonstrated that safe egress is not necessary to manage risk to life; and<br>b) providing appropriate safe refuge and/or safe egress for activities potentially sensitive to natural hazards;<br>c) and minimising all other risks to as low as reasonably practicable.<br><br>(5J) Provide for activities less sensitive to natural hazards within coastal hazard areas in existing urbanised areas where coastal hazard risks are not exacerbated beyond the site. | **Support with amendments** | We support avoiding, managing, and providing for development in the coastal hazard areas in line with risk being categorised as significant, tolerable, and acceptable. This supports a risk-based approach and can reduce the impacts to people and property. We also support providing appropriate safe refuge and safe egress options as this can protect life safety during events.<br><br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. |
| E36.3 Policies [rp/dp] | (5L) Where specified, ensure that appropriate safe refuge is provided during a 1 per cent AEP | **Support in part** | We support this provision, in principle, as it takes a pragmatic approach to life safety. However, taking this | Retain the provision. |

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| Coastal Hazards – within existing urbanised areas | inundation event, taking into account 1.5m relative sea level rise, by either:<br>a) locating buildings outside of inundation hazard areas; or<br>b) when locating buildings within an inundation hazard area that:<br>(i) floodwaters will not enter habitable areas of the building and sufficient freeboard is provided; and<br>(ii) the building is designed and certified to resist hydrostatic and hydrodynamic forces, debris impacts and geotechnical effects, including scour and erosion; and<br>(iii) any residual risk does not pose a risk to life, injury or significant property damage; and<br>(iv) the building can sustain basic human needs for the expected duration of inundation event, including wet-proofed electricity and sewerage systems; and<br>(v) those occupying the building will be aware that the building is a safe refuge. | | approach will lead to impacts people and property, including societal wellbeing and other things we value, such as the economy, environment and built assets (including infrastructure). In addition, protecting life safety only, via the provision of refuge zones, may lead to future insurability issues. | |
| E36.3 Policies [rp/dp]<br>Flooding – within existing urbanised areas | (30D) Avoid new subdivision, use and development in existing urbanised areas that gives rise to significant flood hazard risk in accordance with Table E36.3.1B.1 where it is for activities sensitive to natural hazards [A] or activities potentially sensitive to natural hazards in high hazard areas unless risk can be reduced to a tolerable level by: | **Support with amendments** | We support avoiding development of activities sensitive to natural hazards [A] or activities potentially sensitive to natural hazards in high flood hazard areas when the risk is significant. This supports a risk-based approach and can reduce impacts to people and property.<br>Activities sensitive to natural hazards [A] are areas where people are exposed for extended periods of time and/or vulnerable to natural hazards, therefore we also support requiring safe egress and refuge to ensure risk is at a | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. |

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| | a) providing appropriate safe refuge and safe egress for activities sensitive to natural hazards [A]; and<br>b) providing appropriate safe refuge and safe egress for activities potentially sensitive to natural hazards, unless it can be demonstrated that safe egress is not necessary to manage risk to life;<br>c) and minimising all other risks to as low as reasonably practicable. | | tolerable level. Providing safe egress and refuge is essential for protecting life safety in a flood event.<br><br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | |
| E36.3 Policies [rp/dp]<br><br>Flooding – within existing urbanised areas | (30E) Manage new subdivision, use and development in existing urbanised areas that gives rise to potentially tolerable flood hazard risk in accordance with Table E36.3.1B.1 so that risk is maintained at a tolerable level by:<br>a) providing appropriate safe refuge and safe egress for activities sensitive to natural hazards [A] unless it can be demonstrated that safe egress is not necessary to manage risk to life;<br>b) and providing appropriate safe refuge and/or safe egress for activities potentially sensitive to natural hazards;<br>c) and minimising all other risks to as low as reasonably practicable. | **Support with amendments** | We support managing subdivision and development where the risk is potentially tolerable. This supports a risk-based approach and can reduce impacts to people and property. We also support requiring safe egress and refuge for risk to be at a tolerable level. Providing safe egress and refuge is essential for protecting life safety in a flood event.<br><br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. |
| Resource Management (National Environmental Standards for Plantation Forestry) | If any activity listed in rules (including standards) E36.4.1A to E36.6.1 is regulated by the Resource Management (National Environmental Standard for Plantation Forestry) Regulations 2017 ("NESPF") then the NESPF applies and prevails. However, the NESPF allows the plan to include | **Support with amendments** | We support the inclusion of this National Environmental Standard (NES) for managing forestry. We also support the clear direction about when the NES applies and when the Unitary Plan rules apply as this supports the consistent application of rules and policies. However, the Unitary Plan currently refers to the old NES (plantation forestry) instead of the updated NES (commercial | That the following amendment is made:<br><br>Resource Management (National Environmental Standards for |

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| Regulations 2017 | more restrictive rules in relation to one or more of the following:<br>• Significant Ecological Areas Overlay;<br>• Water Supply Management Areas Overlay;<br>• Outstanding Natural Character Overlay;<br>• High Natural Character Overlay;<br>• Outstanding Natural Landscapes Overlay;<br>• Outstanding Natural Features Overlay; or<br>• activities generating sediment that impact the coastal environment<br>Where there is a rule in the plan that relates to any of the matters listed above then the plan rule will apply. In the event that there is any conflict between the rules in the plan and the NESPF in relation to any of the above, the most restrictive rule will prevail. | | forestry). We recommend referring to the NES commercial forestry to reduce confusion and further support the consistent application of rules and policies. | ~~Plantation~~ Commercial Forestry) Regulations 2017 |
| E36.8.1. Matters of discretion | (2A) for activities where natural hazard risk is potentially tolerable in accordance with Table E36.3.1B.1 in coastal erosion hazard area 3 and coastal inundation hazard area 3:<br>a) type of activity being undertaken and its sensitivity to natural hazard events including the consequences of a natural hazard event;<br>b) the possible effects on public safety and other property resulting from the proposed development or activity;<br>c) the effects on landscape values, associated earthworks and land form modifications; | **Support with amendments** | We support these matters of discretion because they support a risk-based approach and will effectively reduce impacts to people and property. We specifically support the consideration of consequences, public safety, the exacerbation of hazard or risk, and egress routes. These considerations are important to assess because they can directly impact the severity of consequences during an event.<br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. |

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| | d) the effects on public access;<br>e) the methods provided to manage activities and uses within the site, including safe egress from buildings and structures or and the site and the management of people and property during a coastal hazard event;<br>f) any exacerbation of an existing coastal hazard or creation of a new coastal hazard as a result of the proposed activity or development and possible effects on public safety and other property;<br>g) the proposed use of, necessity for and design of hard engineering solutions to mitigate the hazard;<br>h) the ability to relocate buildings or structures, including the proposed duration of occupation of the buildings or structures, taking into account the long term likely effects of climate change; and<br>i) the ability to design, construct and maintain buildings or structures so that they are resilient to the effects of the hazard | | | |
| E36.8.1. Matters of discretion<br>Activities in flood hazard areas | (10A) for activities where natural hazard risk is potentially tolerable in accordance with Table E36.3.1B.1 in low flood hazard areas:<br>a) the type of activity being undertaken and its sensitivity to flood events;<br>b) the likelihood and consequences of a flood event; | **Support with amendments** | We support these matters of discretion. They effectively consider likelihood and consequence and specify different potential consequences to consider. This supports a risk-based approach and can be used to reduce impacts to people and property.<br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. |

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| | c) the possible effects on public safety and other property resulting from the proposed development or activity;<br>d) the effects on landscape values, associated earthworks and land form modifications;<br>e) the effects on public access;<br>f) the methods provided to manage activities and uses within the site, including safe egress from buildings and structures or the site and the management of people and property during a flood event;<br>g) any exacerbation of an existing flood hazard or creation of a new flood hazard as a result of the proposed activity or development and possible effects on public safety and other property;<br>h) the proposed use of, necessity for and design of hard engineering solutions to mitigate the hazard;<br>i) the ability to relocate buildings or structures, including the proposed duration of occupation of the buildings or structures, taking into account the long term likely effects of climate change; and<br>j) the ability to design, construct and maintain buildings or structures so that they are resilient to the effects of the hazard. | | | |
| E36.8.1. Matters of discretion | (13) for any buildings or structures including retaining walls located within an overland flow path with a catchment greater than 4,000m2: | **Support with amendments** | We support the suggested matters of discretion as they can contribute to reducing the impacts to people and property. However, we suggest some further matters of discretion as overland flow paths represent areas of high | The following amendments are made: |

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| Activities in flood hazard areas | a) the effects of flooding on the activity proposed, including whether it is a natural hazard sensitive, potentially sensitive or less sensitive;<br>b) the effects on the location of habitable rooms;<br>c) the design of the building and how it provides for safe access and the potential effects of flood hazards on chosen access routes; and<br>d) the effects on people during a flood event and the ability to avoid, remedy or mitigate these. | | hazard and often higher levels of risk because the velocity of the flood waters is higher in these locations. We suggest including specific reference to areas of safe egress and/or safe refuge as these are important ways to protect life safety during flood events. | e) the methods provided to manage safe egress from the building and/or refuge during and after a flood event. |
| **Definitions** | | | | |
| Activities less sensitive to natural hazards | Activities where there is a minimal presence of people and buildings and which will not create public health or pollution issues in a natural hazard event<br>• marine and port activities<br>• marine and port accessory structures and services<br>• marine and port facilities<br>• marine industry<br>• marine retail<br>• marine passenger operations<br>• informal recreation<br>• organised sport and recreation | **Support with amendments** | We support this definition for activities less sensitive to natural hazards. Activities with low exposure of people and buildings typically have lower levels of risk and so are less likely to be impacted in natural hazard events.<br>We recommend removing 'mineral extractions' from activities less sensitive to natural hazards and listing it is an activity sensitive to natural hazards [B]. Mineral extractions have the potential to cause impacts in a natural hazard event, for example through the collapse of tailing dams, water and land contamination, and soil degradation. However, quarrying would be appropriate to remain as an activity less sensitive to natural hazards. Quarrying only involves rocks and gravel, so has less potential for pollution following a natural hazard event. This approach would also be consistent with other Councils (e.g. Wellington City Council) where quarrying is an activity less sensitive to natural hazards. | The following amendment is made:<br>~~mineral extraction~~ |

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| | • parks infrastructure<br>• public amenities<br>• parking and loading areas<br>• forestry<br>• mineral extraction<br>• buildings for network utilities<br>• rural activities, except those that are listed as 'Activities Potentially Sensitive to Natural Hazards' | | | |
| Activities sensitive to natural hazards [B] | Activities sensitive to natural hazards [B] are activities which, if damaged, may create a significant public health or pollution issue during and/or after a natural hazard event. These include:<br>• cemeteries and urupā<br>• crematoriums<br>• landfills<br>• hazardous facilities and major hazardous facilities<br>• service stations<br>• industrial laboratories<br>• manufacturing<br>• waste management facilities | **Support with amendments** | We support this definition for activities sensitive to natural hazards because it supports a risk-based approach. These activities have the potential to greatly affect people, property, and the environment after a natural hazard event and so should be recognised so that these impacts can be reduced. We also support separating this definition into two parts to recognise differences in the type of consequences that natural hazards can cause.<br>However, we recommend adding 'mineral extraction' as an activity sensitive to natural hazards. Mineral extractions have the potential to cause impacts in a natural hazard event through the collapse of tailing dams, water and land contamination, and soil degradation. As a result of these potential pollution issues mineral extractions should be managed as an activity sensitive to natural hazards [B] to reduce impacts during a natural hazard event. | The following amendment is made:<br>• <u>mineral extraction</u> |
| Coastal erosion hazard area | Any land which is identified as susceptible to coastal erosion or instability triggered by such erosion. The coastal erosion hazard area is | **Support with amendments** | We support this definition for coastal erosion hazard area. Identifying three different areas supports a risk-based approach by identifying where the hazard is likely to be | That hazard maps remain in the district plan rather than being |

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| | subdivided into three areas taking into account increasing sea levels relative to present day:<br>• Area 1: Coastal erosion hazard area taking into account 0.28m of relative sea level rise.<br>• Area 2: Coastal erosion hazard area taking into account between 0.28m and 0.55m of relative sea level rise.<br>• Area 3: Coastal erosion hazard area taking into account between 0.55m and 1.52m of relative sea level rise.<br>Note. The Council holds publicly available information in its Geomaps GIS viewer showing the modelled extent of Areas Subject to Coastal Instability and Erosion (ASCIE) over at least 100 years (to 2130) based on a greenhouse gas emissions Representative Concentration Pathway 8.5M scenarios (RCP 8.5) and 8.5H+ scenario (RCP 8.5+). This includes a 30-year (2050) scenario which accounts for a sea level rise of 0.28m, a 50- year (2080) scenario which accounts for a sea level rise of 0.55m and 100-year (2130) scenario which accounts for a sea level rise of 1.52m relative to present day sea level. The ASCIE maps are based on a regional-scale assessment. The ASCIE maps may be updated by Council to reflect the best information available.<br>A party may provide the Council with a site-specific technical report prepared by a suitably qualified and experienced person to establish the extent of the Coastal Erosion Hazard Area specific to their site and development proposal. The assessment should be consistent with guidance included in 'Coastal Hazard Assessment in the | | more severe. We also support the inclusion of sea level rise and climate change scenarios. This recognises the way that hazards are likely to change in the future because of climate change and will effectively be able to support reducing impacts to people and property.<br>We oppose removing natural hazard mapping from the Unitary Plan due to concerns over natural justice, inconsistent application of rules and policies, and the ability for new information to be consulted and critiqued. Further, retaining hazard maps within the Unitary Plan ensures that maps, data, and information are used for decision-making. Therefore, we recommend that natural hazard maps are retained in the Unitary Plan. | held on an external GIS viewer. |

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| | Auckland Region: Guideline document 2021/010, August 2021' (GD2021/010) and any subsequent update to this document and will be subject to review by Council. | | | |
| Coastal Inundation Hazard Area | The area of coastal land subject to inundation caused by sea level elevations during storm events, where the sea level elevation is of such height as to have a one per cent chance of being equalled or exceeded in any year. This includes wave set up for open coastal areas as well as wave setup and tidal amplification for inner harbours and estuaries. Wave run up is not included. The coastal inundation hazard area is subdivided into three areas taking into account increasing sea levels relative to present day:<br>• Area 1: Coastal inundation hazard areas taking into account a relative sea level rise of up to 0.5m.<br>• Area 2: Coastal inundation hazard areas taking into account a relative sea level rise of between 0.5m and 1m.<br>• Area 3: Coastal inundation hazard areas taking into account a relative sea level rise of between 1m and 1.5m.<br>Note. The Council holds publicly available information in its Geomaps GIS viewer showing the modelled extent of the coastal storm inundation areas. The coastal storm inundation maps are based on a regional-scale assessment. These maps may be updated by Council to reflect the best information available. | **Support with amendments** | We support this definition for coastal erosion hazard area. Identifying three different areas supports a risk-based approach by identifying where the hazard is likely to be more severe. We also support the inclusion of sea level rise and climate change scenarios. This recognises the way that hazards are likely to change in the future because of climate change and will effectively be able to support reducing impacts to people and property.<br>We oppose removing natural hazard mapping from the Unitary Plan due to concerns over natural justice, inconsistent application of rules and policies, and the ability for new information to be consulted and critiqued. Further, retaining hazard maps within the Unitary Plan ensures that maps, data, and information are used for decision-making. Therefore, we recommend that natural hazard maps are retained in the Unitary Plan. | That hazard maps remain in the district plan rather than being held on an external GIS viewer. |

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| | A party may provide the Council with a site specific technical report prepared by a suitably qualified and experienced person to establish the extent of the coastal inundation area specific to their site and development proposal. The assessment should be consistent with the methods and approaches used in Auckland's Exposure to Coastal Inundation by Storm-tides and Waves, December 2020 (Technical report 2020/024) and any subsequent replacement or revisions of this document and will be subject to review by Council. | | | |
| Flood prone area | An area of land within a topographical depression where water will pond in a 1 per cent AEP rainfall event if soakage is restricted or the primary drainage outlet is blocked.<br><br>Note: The Council holds publicly available information showing the modelled extent of Flood Prone Areas in its GIS viewer (Flood Prone map). The Flood Prone map is indicative only and excludes topographical depressions that are less than 300mm deep, have a water surface area of less than 500m2 or a water volume less than 50m3.<br><br>The flood prone map depicts either the area that the depression will fill to in the 1 per cent AEP event or if the depression fills to overflowing, then to the level it starts to spill. | **Support with amendments** | We support this definition for flood prone areas. Ponding during a flood can create accessibility issues and can cause damage to property. Providing a clear definition for these areas can support the clear application of rules and policies and reduce impacts to people and property.<br><br>We oppose removing natural hazard mapping from the Unitary Plan due to concerns over natural justice, inconsistent application of rules and policies, and the ability for new information to be consulted and critiqued. Further, retaining hazard maps within the Unitary Plan ensures that maps, data, and information are used for decision-making. Therefore, we recommend that natural hazard maps are retained in the Unitary Plan. | That hazard maps remain in the district plan rather than being held on an external GIS viewer. |
| Landslide hazard risk area | Any land which is identified and/or assessed as being exposed to risk in accordance with Appendix 24 Landslide hazard risk assessment methodology. These are grouped into three categories: | **Support with amendments** | We support these classifications for landslide hazard risk areas. The risk assessment methodology outlined in Appendix 24 will support the application of these categories, by assessing historic events and current geotechnical assessments. Providing a clear definition for | The following amendments are made:<br>• ~~High (~~significant~~)~~ landslide hazard |

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| | • High (significant) landslide hazard risk area – Any land which, for the proposed development, is identified and/or assessed as being exposed to a significant level of risk.<br>• Medium (tolerable) landslide hazard risk area – Any land which, for the proposed development, is identified and/or assessed as being exposed to a tolerable level of risk.<br>• Low (acceptable) landslide hazard risk area – Any land which, for the proposed development, is identified and/or assessed as being exposed to an acceptable level of risk. | | these areas can support the clear application of rules and policies and reduce impacts to people and property.<br>However, we recommend simplifying some of the definitions to support the clear and consistent application of rules and policies. Each of the hazard risk areas should only be referred to as significant, tolerable, and acceptable rather than the additional high, medium, and low descriptions. This would simplify the existing definition and reduce any confusion with the definitions for landslide susceptibility areas, which also uses high, medium, and low. | risk area – Any land which, for the proposed development, is identified and/or assessed as being exposed to a significant level of risk.<br>• ~~Medium (~~tolerable~~)~~ landslide hazard risk area – Any land which, for the proposed development, is identified and/or assessed as being exposed to a tolerable level of risk.<br>• ~~Low (~~acceptable~~)~~ landslide hazard risk area – Any land which, for the proposed development, is identified and/or assessed as being exposed to an acceptable level of risk. |

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| Landslide susceptibility assessment area | Any land which has evidence of past landslides or is predicted to be susceptible to shallow landslides and/or large-scale landslides, taking into account the relative potential likelihood of a landslide occurring in the future, compared with surrounding areas. These are grouped into three categories:<br>• High landslide susceptibility assessment area – any land which is predicted to have a high or very high susceptibility to landslides and shown accordingly in the Council's GIS Viewer,<br>• Medium landslide susceptibility assessment area – any land which is predicted to have a medium susceptibility to landslides and shown accordingly in the Council's GIS Viewer<br>• Low landslide susceptibility assessment area – any land which is predicted to have a very low or low susceptibility to landslides and shown accordingly in the Council's GIS Viewer,<br>Note: The Council holds publicly available information in its Geomaps GIS viewer showing known landslides in mapped landslide inventories. Other sources of information available include the Earth Sciences Geological Map of New Zealand collection and Natural Hazards Commission claims portal.<br>The Council also holds publicly available information in its Geomaps GIS viewer showing the modelled extent of landslide susceptibility for shallow landslides and largescale landslides. The | **Support with amendments** | We support providing classification for different type of landslide susceptibility. Providing a clear definition for these areas can support the clear application of rules and policies and reduce impacts to people and property. However, we oppose hazard maps being stored in an external GIS viewer.<br>We oppose removing natural hazard mapping from the Unitary Plan due to concerns over natural justice, inconsistent application of rules and policies, and the ability for new information to be consulted and critiqued. Further, retaining hazard maps within the Unitary Plan ensures that maps, data, and information are used for decision-making. Therefore, we recommend that natural hazard maps are retained in the Unitary Plan.<br>While we support the use of the NHC Natural Hazards Portal, we recommend that the text is updated so that it refers to the Natural Hazards Portal in full. Using the correct name will avoid any confusion and promote its consistent use. | That hazard maps remain in the district plan rather than being held on an external GIS viewer.<br>That the following amendment is made:<br>Natural Hazards Commission ~~Claims Portal~~ Natural Hazards Portal |

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| | landslide susceptibility maps are based on a regional-scale assessment and are not intended to be viewed or relied upon on a property-level scale. A party may provide the Council with a site-specific technical report prepared by a suitably qualified and experienced person to establish the extent of the landslide susceptibility area (assessed in accordance with GNS Science 1441 ) and any associated landslide hazard area specific to their site and development proposal, assessed in accordance with Appendix 24 Landslide hazard risk assessment methodology.<br><br>The assessment of landslide susceptibility should also be consistent with the methods and approaches used in the Auckland Region Landslide Susceptibility Assessment, May 2025 (Technical report 2025/7) and any subsequent replacement or revisions of this document and will be subject to review by Council.<br><br>These maps may be updated by Council to reflect the best information available. | | | |
| Overland flow path | A low point in terrain (excluding permanent streams) where surface runoff will flow during rainfall events.<br><br>Excludes the following areas:<br><br>• constructed depressions and pits within Special Purpose - Quarry Zone.<br><br>Note The Council holds publicly available information showing the modelled Overland Flow Paths in its GIS viewer (the Overland Flow Path map). The Overland Flow Path map is indicative only and shows only the thalweg, not the full | **Support with amendments** | We support this definition for overland flow path. Providing a clear definition for these areas can support the clear application of rules and policies and reduce impacts to people and property. However, we oppose hazard maps being stored in an external GIS viewer.<br><br>We oppose removing natural hazard mapping from the Unitary Plan due to concerns over natural justice, inconsistent application of rules and policies, and the ability for new information to be consulted and critiqued. Further, retaining hazard maps within the Unitary Plan ensures that maps, data, and information are used for | That hazard maps remain in the district plan rather than being held on an external GIS viewer. |

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| | extent of the Overland Flow Path. The thalweg is the line of the lowest elevation on a cross-section of the overland flow path) and further technical assessment by a suitably qualified and experienced person is required to establish the extent, depth and flow characteristics. The actual extent of any particular Overland Flow Path may extend beyond the site on which the thalweg is depicted.<br><br>Council will continually update the Overland Flow Path map to reflect the best information available. | | decision-making. Therefore, we recommend that natural hazard maps are retained in the Unitary Plan. | |
| **Chapter E Auckland-wide – Subdivision** | | | | |
| E38.2 & E39.2. Objectives | (10) Subdivision:<br><br>(aa) only occurs when the risk from natural hazards, including the potential effects of climate change, to people, property, infrastructure and the environment is tolerable or acceptable;<br><br>(c) maintains the function of flood plains and overland flow paths to safely convey flood waters, and of natural features and buffers in the coastal environment, as natural defences against coastal hazards, while taking into account the long term effects of climate change; | **Support with amendments** | We support these objectives to manage natural hazard risk when subdividing. These objectives support a risk-based approach and consider the effects of climate change which can support reducing the impacts to people and property.<br><br>Maintaining the function of overland flow paths and flood plains is also essential for managing flood risk. These areas are where flood waters naturally flow during flood events and so have higher levels of flood hazard.<br><br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. |
| E38.13. Special information requirements | (1) A hazard risk assessment must be undertaken when subdivision, use or development requiring resource consent is proposed to be undertaken on land which are within any one or more natural hazard areas. The level of information required to | **Support with amendments** | We support requiring a hazard risk assessment to be undertaken when subdivision, use, or development in a hazard area required resource consent. A hazard risk assessment is crucial for identifying whether the risk is significant, tolerable, or acceptable and any potential | That the Council provides clear guidance for what a proportional hazard |

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| | be provided should be proportionate to the hazard risk, the nature of the hazard. It should also be appropriate to the scale, nature and location of the development and reflective of the scale of the activity proposed. For coastal hazards this should include a consideration of the potential effects of climate change over at least a 100-year timeframe. | | mitigations or risk treatment options that may be needed. However, we recommend providing more guidance on what an assessment proportional to the hazard risk means. For example, clear expectations could be set for what is required in a hazard risk assessment for subdivision in the each of the identified hazard areas. | risk assessment looks like. |
| Chapter H Zones – **Residential** | | | | |
| H3.2. Objectives | (5) Development does not adversely affect the values of adjoining water bodies including riparian, lakeside and coastal protection areas; nor increases natural hazard risks.<br><br>(9) Development, including redevelopment, only occurs when the risk from natural hazards to people, property, infrastructure and the environment is tolerable or acceptable in the short to long term. | **Support with amendments** | We support objectives that clearly outline intentions to not increase natural hazard risk and ensure that development only occurs when risk is at tolerable or acceptable levels. This supports a risk-based approach and can reduce impacts to people and property.<br><br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. |
| H3.3., H4.3., H5.2., & H6.3 Policies | (11) Restrict development in high hazard areas and manage development in medium or low hazard areas to ensure natural hazard risk is tolerable or acceptable. | **Support with amendments** | We support this policy because it supports a risk-based approach and can reduce impacts to people and property.<br><br>However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term 'potentially tolerable' is provided. |
| H3.4. Activity table | The purpose of land use activities H3.4.1 (A3), (A5), (A6), (A9), (A11), (A13), (A15), (A22), (A23) in the Residential – Single House Zone includes restricting development in high hazard areas and managing development in medium or low hazard | **Support with amendments** | We support including land use activities that are intended to restrict development in high hazard areas and manage it in low or medium hazard areas. This approach is consistent with Policy H3.3 and supports a risk-based approach, which can reduce impacts to people and property. | That consistency between the terms 'potentially tolerable' and 'tolerable' is provided; and clarity about the term |

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| | areas to ensure natural hazard risk is tolerable or acceptable. | | However, we recommend being clearer about the use of 'tolerable' and 'potentially tolerable' risk, as per our feedback attached to our cover letter, to support the clear and consistent implementation of rules and policies. | 'potentially tolerable' is provided. |
| Appendix 24 – Landslide hazard risk **assessment** methodology | | | | |
| - | - | **Support with amendments** | We support the outlined landslide hazard risk assessment. It supports a clear risk-based approach for land use planning and can contribute to reducing the impacts to people and property. We also support the use of the Natural Hazards Commission Natural Hazards Portal to assess residential claim history since 1997. However, we recommend that the text is updated so that it refers to the Portal in full using the correct name to avoid any confusion and promote its consistent use. | The following amendment is made as part of Stage 1.1:<br>Natural Hazards Commission ~~claims portal~~ Natural Hazards Portal. |