

To the Planning Team, Waitaki District Council

Name of submitter: Sarah-Jayne McCurrach

Organisation: Natural Hazards Commission Toka Tū Ake

Email: resilience@naturalhazards.govt.nz

Date: 22 May 2026

Thank you for the opportunity to make a further submission on the Waitaki Proposed District Plan (PDP).

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 Waitaki Proposed District Plan (PDP) in this regard, and we have identified some submissions that we oppose.

We note that there are multiple submissions requesting that the Waitaki Proposed District Plan is aligned more closely to either the Otago proposed Regional Policy Statement or provisions developed by Canterbury Regional Council. We acknowledge that the methods of managing natural hazard risk developed by the regional councils may not align, and that this creates tension for Waitaki District Council. Given Waitaki spans both Otago and Canterbury regions, we encourage the regional councils to work together and with Waitaki District Council on an agreed and workable approach for the district.

Our comments on these submissions can be found in the attached Further Submission Table, ordered by chapter and provision.

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

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

Natural Hazards Commission Toka Tū Ake Further Submission on the Waitaki Proposed District Plan (PDP)

To: Waitaki District Council

Via Council submission email: planreview@waitaki.govt.nz

Submitter: Natural Hazards Commission Toka Tū Ake (NHC)

1. This is a further submission on the following:

The Waitaki Proposed District Plan (PDP) notified on 01/03/2025.

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

4. NHC does not wish to be heard in support of this further submission.

Date: 22/05/2026

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Wellington
6140

Contact person: Sarah-Jayne McCurrach

Email: resilience@naturalhazards.govt.nz

Original Submitter	Sub-mission Number	Description	Support/ Oppose	Reasoning	Requested Action
Subdivision					
Fire and Emergency New Zealand	163.48	SUB-P12 – Amend as follows: Ensure that subdivision is designed and located to: ... <u>14. provide adequate emergency service access.</u>	Support	NHC supports ensuring that subdivision provides for adequate access for emergency services.	We request the submission be allowed.
Canterbury Regional Council	271.420	SUB-R16 – seeks rewording as follows: 'Subdivision of a site located fully or partially in the Surface Fault Rupture Hazard Awareness Overlay – Subdivision' to remove 'fault avoidance zone' and increase the setback to be consistent with how CRC have mapped the Ostler Fault in Mackenzie District Amend SUB-R16 as follows: Activity status: Discretionary Where: DIS-1 A zone of deformation associated with fault rupture is mapped at a scale of at least 1:10,000 to create a fault avoidance zone; and DIS-2	Support	NHC supports consistency in natural hazard management across districts and regions. We also support avoidance of new buildings and allotments within deformation zones around faults. We therefore support updating the fault hazard awareness layers to align with mapping that has been done by Canterbury Regional Council to keep management of land use around faults that cross multiple districts consistent. However, we acknowledge that Waitaki District spans both Otago and Canterbury regions, and these requirements may be inconsistent with those of the Otago Regional Council. We support open communication with and between the regional councils to agree on provisions to produce consistency within the district.	We request the submission be allowed.

		The subdivision layout provides for future <u>allotments</u> , buildings and structures to be set back at least 20 50 metres from the zone of deformation of the fault rupture <u>on the downthrown side of the fault and 100 metres from the zone of deformation of the fault rupture on the upthrown side of the fault.</u>			
Strategic Direction					
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.45	SD-RRNH-O1 – Considers the Natural Hazards objective should provide stronger direction for avoiding and managing hazard risks in the district. Seeks to amend as follows: Improve <u>and safeguard</u> the District’s resilience to natural hazards and <u>coastal natural hazards, including the effects of climate change</u>, and where possible <u>reduce significant risks</u> avoid or, where avoidance is not possible, mitigate the risks to people, communities, property, <u>the environment</u>, and infrastructure.	Support in part	NHC supports including the effects in climate change in Natural Hazard chapter objectives. We also support strengthening directions to avoid and manage natural hazard risks in the district but note that if the phrase “significant risk” is added then a definition of significant risk should be included in the plan to ensure it is consistently applied. The National Policy Statement on Natural Hazards (NPS-NH)¹ contains guidance on creating a matrix to assess the level of natural hazard risk and determining appropriate management strategy for the level of risk present. The phrasing “natural hazards and coastal natural hazards” is reductive as the PDP is written, but we support it if a separate definition of “coastal natural hazards” is included in line with the pORPS (proposed Otago Regional Policy Statement).	We request the submission be allowed with the following amended wording: ... “where possible reduce significant risks” OR With the wording specified in the submission and an additional definition of “significant risk”.

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				¹ https://environment.govt.nz/publications/national-policy-statement-for-natural-hazards/	
Meridian Energy Limited	294.18	SD-RRNH-O1 – Seeks to amend as follows: Improve the District’s resilience to natural hazards, and where possible, avoid or, where avoidance is not possible, mitigate by managing the <u>significant</u> risks to people, communities, property, and infrastructure	Oppose	NHC supports pursuing avoidance strategies in areas at high risk from natural hazards to increase resilience. We consider the original wording of the objective – “Improve the District’s resilience to natural hazards, and where possible, avoid or, where avoidance is not possible, mitigate the risks to people, communities, property, and infrastructure” - to be appropriate in achieving this end.	We request the submission be disallowed.
Planning Maps					
Livingstone Creek Farming Ltd	216.8	Seeks a complete halt on all Overlays and associated provisions in the PDP Maps.	Oppose	NHC supports the Waitaki District Council in using the best available information in creating hazard maps, and consider that the overlays in the Proposed District Plan are appropriate for triggering further site-specific investigation of natural hazard risk.	We request the submission be disallowed.
Cormorants on Waterfront Limited	235.17	Seeks to remove the Tsunami Hazard Area information layer only overlay from the Planning maps and in particular from 7-8 Waterfront Road.	Oppose	NHC supports the Waitaki District Council in using the best available information in creating hazard risk maps, and consider that the overlays in the Proposed District Plan are appropriate for triggering further site-specific investigation of natural hazard risk.	We request the submission be disallowed.
Otago Regional Council	259.92	Seeks the following: • reconsiders the Otago Flood Assessment Overlay in the proposed WDP maps (or any other relevant provisions in the proposed WDP) once	Support	NHC supports using the best available information in creating hazard risk maps for land use planning purposes, including updated	We request the submission be allowed.

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		provided with new information on flood overlay mapping from ORC. Consider all available procedural options to ensure the information, once available, can be appropriately considered by any interested parties within the draft plan process.		flood overlay mapping from the Otago Regional Council. We support appropriate consultation with affected parties for any change to natural hazard overlays.	
OceanaGold (New Zealand) Limited	295.234	Seeks to remove the natural hazard overlays from within the SPZMM.	Oppose	NHC supports the Waitaki District Council in using the best available information in creating hazard risk maps and consider that the overlays in the Proposed District Plan are appropriate for triggering further site-specific investigation of natural hazard risk.	We request the submission be disallowed.
Twin Terraces Ltd & Cayuga Ltd	299.331	Seeks the removal of the Waitaki Plains Flood Assessment overlay mapping, or alternatively for the removal of its rules by deleting NH-R3.	Oppose	NHC supports the Waitaki District Council in using the best available information in creating hazard risk maps and consider that the overlays in the Proposed District Plan are appropriate for triggering further site-specific investigation of natural hazard risk.	We request the submission be disallowed.
Natural Hazards					
Otago Regional Council	259.32	Introduction – Considers that the last paragraph of the introduction creates confusion by separating coastal and non-coastal hazards, despite hazards such as tsunami or earthquakes affecting both areas. Seeks amendments to clarify which provisions apply in these two circumstances, consistent with the provisions of the pORPS.	Support	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS.	We request the submission be allowed.

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Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.129 251.133	Considers that the Natural Hazards chapter requires updating to align with pORPS direction on not exacerbating natural hazard risk. The submitter also considers it important that Kāi Tahu and Māori landowners are enabled to lead natural hazard management on their land. Seeks to add a new policy addressing the matters in the PORPS HAZ-NH-P11 for natural hazards outside of the coastal environment.	Support	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS.	We request the submission be allowed.
Canterbury Regional Council	271.263	Insert new policy: NH-PX Natural hazard mitigation works undertaken by or on behalf of the Crown: <u>Natural Hazard Mitigation Works undertaken by a Regional or District Council are enabled, where community scale hazard mitigation is necessary to protect existing communities from natural hazard risk which cannot reasonably be avoided, and any adverse effects on the identified values and qualities of Outstanding Landscapes and Features, the Coastal Environment, Visual Amenity Landscapes, Significant Natural Areas, High Naturalness Waterbodies Areas, Sites of Significance to Māori, Historic Heritage, cultural, and archaeological areas sites, riparian margins and Notable Trees are mitigated.</u>	Support	NHC supports including provisions within the Waitaki District Plan that recognise natural hazard mitigation works undertaken by Regional and District Councils. We support natural hazard protection works for activities which have a functional need to exist within natural hazard overlays, and there is no reasonable alternative location.	We request the submission be allowed.
Canterbury Regional Council	271.249	Introduction – Amend the NH Introduction to highlight in the surface fault rupture and liquefaction sections, the same concept that is mentioned in the flooding sections – that the overlay identifies where potential for flooding may	Support	We consider that consistency in language across the PDP is important in reducing uncertainty and making the provisions easier to implement.	We request the submission be allowed.

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		exist and should be investigated further at a site specific level if subdivision or other activities are proposed. Amend as follows: Deformation associated with faults has not been mapped at a suitable scale to draw fault avoidance zones. The overlays identify areas where potential for surface fault rupture may exist and should be investigated further at a site-specific level if these activities are proposed.		Natural hazard overlays are frequently misunderstood as being predictions of where a hazard will occur, rather than an area in which hazard effects may occur and should be investigated further. As such we support including clear and accessible language explaining why and how all natural hazard overlays are used within the PDP.	
Canterbury Regional Council	271.250	Introduction – Amend the Liquefaction paragraph as follows: The Liquefaction Assessment Overlay in the Plan covers areas identified by the Regional Councils where the local geology, soil type and groundwater level indicate that damage from liquefaction is possible and requires further <u>liquefiable soils may be present and a site-specific investigation involving testing of the soils should be undertaken to determine the liquefaction hazard and mitigate it if necessary, prior to subdivision or other activities.</u>	Support	We consider that consistency in language across the PDP is important in reducing uncertainty and making the provisions easier to implement. Natural hazard overlays are frequently misunderstood as being predictions of where a hazard <i>will</i> occur, rather than an area in which hazard effects <i>may</i> occur and should be investigated further. As such we support including clear and accessible language explaining why and how all natural hazard overlays are used within the PDP.	We request the submission be allowed.
Dogterom Thomson Ltd	282.23	NH-P1 – Seeks to amend as follows: As information becomes available, identify and map land that may <u>is known to be</u> subject to natural hazards, including taking into account the effects of climate change.	Oppose	Natural hazard maps represent areas which may be impacted by natural hazards in the future, and not predictive tools. These overlays are intended to identify areas which require further site-specific investigation to determine the actual risk and whether development is appropriate.	We request the submission be disallowed.

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				Identifying and mapping only areas which are “known to be subject to natural hazards” is therefore counter to the purpose of producing natural hazard maps and overlays. It is also subject to misinterpretation, as some uncertainty about the extent of natural hazard effects is always present.	
Dogterom Hohepa Ltd	283.23	NH-P1 – Seeks to amend as follows: As information becomes available, identify and map land that may is <u>known to be</u> subject to natural hazards, including taking into account the effects of climate change.	Oppose	Natural hazard maps represent areas which may be impacted by natural hazards in the future, and not predictive tools. These overlays are intended to identify areas which require further site-specific investigation to determine the actual risk and whether development is appropriate. Identifying and mapping only areas which are “known to be subject to natural hazards” is therefore counter to the purpose of producing natural hazard maps and overlays. It is also subject to misinterpretation, as some uncertainty about the extent of natural hazard effects is always present.	We request the submission be disallowed.
Dogterom Duntroon Ltd	284.23	NH-P1 – Seeks to amend as follows: As information becomes available, identify and map land that may is <u>known to be</u> subject to natural hazards, including taking into account the effects of climate change.	Oppose	Natural hazard maps represent areas which may be impacted by natural hazards in the future, and not predictive tools. These overlays are intended to identify areas which require further site-specific investigation to determine the actual risk and whether development is appropriate. Identifying and mapping only areas which are “known to be subject to natural hazards” is	We request the submission be disallowed.

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				therefore counter to the purpose of producing natural hazard maps and overlays. It is also subject to misinterpretation, as some uncertainty about the extent of natural hazard effects is always present.	
Twin Terraces Ltd & Cayuga Ltd	299.23	NH-P1 – Seeks to amend as follows: As information becomes available, identify and map land that may is <u>known to be</u> subject to natural hazards, including taking into account the effects of climate change.	Oppose	Natural hazard maps represent areas which may be impacted by natural hazards in the future, and not predictive tools. These overlays are intended to identify areas which require further site-specific investigation to determine the actual risk and whether development is appropriate. Identifying and mapping only areas which are “known to be subject to natural hazards” is therefore counter to the purpose of producing natural hazard maps and overlays. It is also subject to misinterpretation, as some uncertainty about the extent of natural hazard effects is always present.	We request the submission be disallowed.
Springbank	312.286	NH-P1 – Seeks to amend as follows: As information becomes available, identify and map land that may is <u>known to be</u> subject to natural hazards, including taking into account the effects of climate change.	Oppose	Natural hazard maps represent areas which may be impacted by natural hazards in the future, and not predictive tools. These overlays are intended to identify areas which require further site-specific investigation to determine the actual risk and whether development is appropriate. Identifying and mapping only areas which are “known to be subject to natural hazards” is therefore counter to the purpose of producing natural hazard maps and overlays. It is also	We request the submission be disallowed.

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				subject to misinterpretation, as some uncertainty about the extent of natural hazard effects is always present.	
Geoff & Jan Keeling - Keeling Dairies Limited	313.27	NH-P1 – Seeks to amend as follows: As information becomes available, identify and map land that may <u>is known to be</u> subject to natural hazards, including taking into account the effects of climate change.	Oppose	Natural hazard maps represent areas which may be impacted by natural hazards in the future, and not predictive tools. These overlays are intended to identify areas which require further site-specific investigation to determine the actual risk and whether development is appropriate. Identifying and mapping only areas which are “known to be subject to natural hazards” is therefore counter to the purpose of producing natural hazard maps and overlays. It is also subject to misinterpretation, as some uncertainty about the extent of natural hazard effects is always present.	We request the submission be disallowed.
Transpower New Zealand Limited	309.94	NH – P10 – Seeks to amend as follows: Require applications for critical facilities and regionally significant infrastructure , education facilities, retirement village and buildings containing hazardous substances within the Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings to demonstrate that any potential effects of fault rupture are avoided or mitigated as far as practicable.	Oppose	There is no way of predicting exactly how and where a fault will rupture during an earthquake, which can result in significant ground movement. As such, ground deformation from fault rupture cannot be adequately mitigated or managed except by avoidance. It is important that critical facilities and regionally significant infrastructure, including electrical and communications infrastructure, is able to continue functioning after an earthquake. This is particularly important in districts such as Waitaki with remote	We request the submission be disallowed.

				communities which are vulnerable to isolation in the wake of an event. As such, NHC recommends that critical facilities and regionally significant infrastructure is avoided within the Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings, unless there are no other feasible or practicable alternatives to locating inside the area; and there are the operational needs or functional needs for the location of the facility or infrastructure.	
Dogterom Thomson Ltd	282.27	NH-P13 – Amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate <u>any</u> methods to reduce or mitigate the risk. to an acceptable level. Alternatively, if ‘use’ is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment <u>consider the effects</u> of natural hazard risk and incorporate methods to reduce or mitigate the risk to an acceptable level.	Oppose	As per our original submission, NHC supports <i>requiring</i> proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate methods to reduce or mitigate the risk. We consider that the original wording retaining “use” and “undertake an assessment” is appropriate. However, we agree that “acceptable risk” needs to be defined within the plan. The National Policy Statement on Natural Hazards (NPS-NH)¹ contains guidance on creating a matrix to assess the level of natural hazard risk and determining appropriate management strategy for the level of risk present. ¹https://environment.govt.nz/publications/national-policy-statement-for-natural-hazards/	We request that part of the submission be disallowed.

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Dogterom Hohepa Ltd	283.27	NH-P13 – Amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate <u>any</u> methods to reduce or mitigate the risk. to an acceptable level. Alternatively, if ‘use’ is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment <u>consider the effects</u> of natural hazard risk and incorporate methods to reduce or mitigate the risk to an acceptable level.	Oppose	As per our original submission, NHC supports <i>requiring</i> proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate methods to reduce or mitigate the risk. We consider that the original wording retaining “use” and “undertake an assessment” is appropriate. However, we agree that “acceptable risk” needs to be defined within the plan. The National Policy Statement on Natural Hazards (NPS-NH)¹ contains guidance on creating a matrix to assess the level of natural hazard risk and determining appropriate management strategy for the level of risk present. ¹https://environment.govt.nz/publications/national-policy-statement-for-natural-hazards/	We request that the submission be disallowed.
Dogterom Duntroon Ltd	284.27	NH-P13 – Amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate <u>any</u> methods to reduce or mitigate the risk. to an acceptable level. Alternatively, if ‘use’ is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment <u>consider the</u>	Oppose	As per our original submission, NHC supports <i>requiring</i> proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate methods to reduce or mitigate the risk. We consider that the original wording retaining “use” and “undertake an assessment” is appropriate. However, we agree that “acceptable risk” needs to be defined within the plan. The National Policy Statement on Natural Hazards (NPS-NH)¹ contains guidance on	We request that the submission be disallowed.

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		effects of natural hazard risk and incorporate methods to reduce or mitigate the risk to an acceptable level.		creating a matrix to assess the level of natural hazard risk and determining appropriate management strategy for the level of risk present. ¹ https://environment.govt.nz/publications/national-policy-statement-for-natural-hazards/	
Twin Terraces Ltd & Cayuga Ltd	299.27	NH-P13 – Amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate any methods to reduce or mitigate the risk. to an acceptable level. Alternatively, if ‘use’ is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment <u>consider the effects</u> of natural hazard risk and incorporate methods to reduce or mitigate the risk to an acceptable level.	Oppose	As per our original submission, NHC supports <i>requiring</i> proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate methods to reduce or mitigate the risk. We consider that the original wording retaining “use” and “undertake an assessment” is appropriate. However, we agree that “acceptable risk” needs to be defined within the plan. The National Policy Statement on Natural Hazards (NPS-NH) ¹ contains guidance on creating a matrix to assess the level of natural hazard risk and determining appropriate management strategy for the level of risk present. ¹ https://environment.govt.nz/publications/national-policy-statement-for-natural-hazards/	We request that the submission be disallowed.
Springbank	312.295	NH-P13 – Amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural	Oppose	As per our original submission, NHC supports <i>requiring</i> proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate methods to reduce or mitigate the risk. We consider that the	We request that the submission be disallowed.

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		hazard risk and incorporate <u>any</u> methods to reduce or mitigate the risk. to an acceptable level. Alternatively, if 'use' is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment <u>consider the effects</u> of natural hazard risk and incorporate methods to reduce or mitigate the risk to an acceptable level.		original wording retaining “use” and “undertake an assessment” is appropriate. However, we agree that “acceptable risk” needs to be defined within the plan. The National Policy Statement on Natural Hazards (NPS-NH)¹ contains guidance on creating a matrix to assess the level of natural hazard risk and determining appropriate management strategy for the level of risk present. ¹https://environment.govt.nz/publications/national-policy-statement-for-natural-hazards/	
Geoff & Jan Keeling - Keeling Dairies Limited	313.36	NH-P13 – Amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate <u>any</u> methods to reduce or mitigate the risk. to an acceptable level. Alternatively, if 'use' is to remain, seeks to amend as follows: Encourage proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment <u>consider the effects</u> of natural hazard risk and incorporate methods to reduce or mitigate the risk to an acceptable level.	Oppose	As per our original submission, NHC supports <i>requiring</i> proposals for subdivision, use and development in a natural hazard awareness overlay to undertake an assessment of natural hazard risk and incorporate methods to reduce or mitigate the risk. We consider that the original wording retaining “use” and “undertake an assessment” is appropriate. However, we agree that “acceptable risk” needs to be defined within the plan. The National Policy Statement on Natural Hazards (NPS-NH)¹ contains guidance on creating a matrix to assess the level of natural hazard risk and determining appropriate management strategy for the level of risk present.	We request that the submission be disallowed.

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				1 https://environment.govt.nz/publications/national-policy-statement-for-natural-hazards/	
Canterbury Regional Council	271.253	NH-P2 – Amend the policy as follows: Avoid subdivision, use and development in areas subject to where natural hazards may occur, unless it can be demonstrated that the risk from natural hazards to people, property, and the environment can be mitigated to an acceptable level, taking into consideration:	Support	We consider that consistency in language across the PDP is important in reducing uncertainty and making the provisions easier to implement.	We request the submission be allowed.
Fuel Companies	238.42	NH-P3 – The submitters seek to amend policy as follows: Avoid locating <u>Manage the location of</u> critical facilities and regionally significant infrastructure in areas with identified natural hazard risks, unless it can be demonstrated that <u>taking into account:</u> 1. there are no other feasible or practicable alternatives to locating inside the area; and 2. there are the operational needs or functional needs for the location of the facility or infrastructure; and 3. the design and function are resilient to natural hazard risk. OR, in the alternative, Amend Policy NH-P3 as follows: Avoid locating critical facilities and regionally significant infrastructure in areas with identified natural hazard risks <u>Surface Fault</u>	Oppose	It is important that critical facilities and regionally significant infrastructure, including electrical and communications infrastructure, is able to continue functioning after a natural hazard event. This is particularly important in districts such as Waitaki with remote communities which are vulnerable to isolation in the wake of an event. As such, NHC supports avoiding locating critical facilities and regionally significant infrastructure in areas at risk from natural hazards, unless there are no other feasible or practicable alternatives to locating inside the area; and there are the operational needs or functional needs for the location of the facility or infrastructure.	We request the submission be disallowed.

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		<u>Rupture Hazard Awareness Overlay</u>, unless it can be demonstrated that: OR Delete Policy NH-P3 on the basis that Policy NH-P10 applies to critical facilities and regionally significant infrastructure in the Surface Fault Rupture Hazard Awareness Overlay.			
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.136	Seeks to amend NH-P3 to be consistent with the PORPS EIT-INF chapter and HAZ-CL chapters Seeks to amend as follows: <u>4. The activity does not exacerbate natural hazard risks to the site or to surrounding sites and properties</u>	Support	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS.	We request the submission be allowed.
Canterbury Regional Council	271.254	NH-P3 – Amend the policy as follows: Avoid locating critical facilities and regionally significant infrastructure in areas <u>subject to with identified</u> natural hazards risks, unless it can be demonstrated that: there are no other feasible or practicable alternatives to locating inside the area; and there are operational needs or functional needs for the location; and the design and function are resilient to natural hazard risk, <u>as far as practicable.</u>	Support	We consider that consistency in language across the PDP is important in reducing uncertainty and making the provisions easier to implement.	We request the submission be allowed.
Dogterom Thomson Ltd	282.26	NH-P4 – Amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which	Oppose	NHC supports prioritisation of natural features and methods other than hard engineering solutions to manage natural hazard risk. This is consistent with provisions in the pORPS and	We request the submission be disallowed.

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		provide protection from natural hazard risk <u>where engineering solutions are not required to mitigate risk to people, property and infrastructure.</u>		the NZCPS (New Zealand Coastal Policy Statement).	
Dogterom Hohepa Ltd	283.26	NH-P4 – Amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk <u>where engineering solutions are not required to mitigate risk to people, property and infrastructure...</u>	Oppose	NHC supports prioritisation of natural features and methods other than hard engineering solutions to manage natural hazard risk. This is consistent with provisions in the pORPS and the NZCPS.	We request the submission be disallowed.
Dogterom Duntroon Ltd	284.26	NH-P4 – Amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk <u>where engineering solutions are not required to mitigate risk to people, property and infrastructure.</u>	Oppose	NHC supports prioritisation of natural features and methods other than hard engineering solutions to manage natural hazard risk. This is consistent with provisions in the pORPS and the.	We request the submission be disallowed.
Twin Terraces Ltd & Cayuga Ltd	299.26	NH-P4 – Amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk <u>where engineering solutions are not required to mitigate risk to people, property and infrastructure.</u>	Oppose	NHC supports prioritisation of natural features and methods other than hard engineering solutions to manage natural hazard risk. This is consistent with provisions in the pORPS and the NZCPS.	We request the submission be disallowed.
Springbank	312.289	NH-P4 – Seeks the following amendments to Natural protection features Encourage the use, protection, maintenance and enhancement of natural features, buffers and	Oppose	NHC supports prioritisation of natural features and methods other than hard engineering solutions to manage natural hazard risk. This is	We request the submission be disallowed.

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		systems, such as wetlands and vegetation, which provide protection from natural hazard risk <u>where engineering solutions are not required to mitigate risk to people, property and infrastructure.</u>		consistent with provisions in the pORPS and the NZCPS.	
Geoff & Jan Keeling - Keeling Dairies Limited	313.30	NH-P4 – Amend as follows: Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as wetlands and vegetation, which provide protection from natural hazard risk <u>where engineering solutions are not required to mitigate risk to people, property and infrastructure.</u>	Oppose	NHC supports prioritisation of natural features and methods other than hard engineering solutions to manage natural hazard risk. This is consistent with provisions in the pORPS and the NZCPS.	We request the submission be disallowed.
Otago Regional Council	259.35	NH-P5 – Seeks to amend to ensure greater alignment with the process steps, matters and criteria in APP6 – Methodology for natural hazard risk assessment in the pORPS; including considering 1. cumulative effects including multiple and cascading hazards, where present 2. the effects of climate change, 3. assessing vulnerability and resilience	Support	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS. However, we acknowledge that Waitaki District spans both Otago and Canterbury regions, and these requirements may be inconsistent with those of the Canterbury Regional Council. We support open communication with and between the regional councils to agree on provisions to produce consistency within the district.	We request the submission be allowed.
Canterbury Regional Council	271.256	NH-P5 – Amend the policy as follows: A <u>risk site specific hazard</u> assessment will be required for subdivision, use and development in areas <u>subject to risk from that are potentially susceptible to</u> natural hazards that takes into account all of the following:	Support	We consider that consistency in language across the PDP is important in reducing uncertainty and making the provisions easier to implement.	We request the submission be allowed.

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Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.139	NH-P6 – Seeks to amend as follows: - Clarify the meaning of “material damage”. - Provide consistency with the PORPS by inserting under each list of requirements wording to the effect of: <u>5. It will not exacerbate the effects or risks of the natural hazard upon surrounding sites and properties, including Māori land and Native Reserves</u> - For the second part of the policy which provides for subdivision, use and development in sites not in the High Flood Hazard Area, inserting under the list of requirements as follows: 1. significant adverse effects on people and, property, <u>and other aspects of the environment</u> are avoided; and <u>6. The activity avoids adverse effects (including reverse sensitivity effects) to natural hazard mitigation measures</u>	Support	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS. We consider it important to require that activities do not exacerbate natural hazard risks on adjoining sites or create adverse effects to natural hazard mitigation efforts.	We request the submission be allowed.
Federated Farmers of New Zealand Incorporated	246.97	NH-P7 (4) – Amend as follows: <u>4.hazardous facilities and major hazard facilities</u> spaces that store hazardous substances will not be inundated.	Support	NHC supports using language that is less open to interpretation than “spaces that store hazardous substances”, and considers that “hazardous facilities and major hazardous facilities”, as defined in the PDP adequately encompasses the type of structure and activity that should be restricted within the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay	We request the submission be allowed.

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Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.140	NH-P7 – Seeks to amend as follows: - Clarify the meaning of “material damage”. - Give effect to the PORPS by inserting under the list of requirements wording to the effect of: ... 1. significant adverse effects on people <u>and</u>, property, <u>and other aspects of the environment</u> are avoided; and <u>5. the activity will not exacerbate the effects or risks of the natural hazard upon surrounding sites and properties, including Māori land and Native Reserves; and</u> <u>6. the activity avoids adverse effects (including reverse sensitivity effects) to natural hazard mitigation measures</u>	Support	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS. However, we acknowledge that Waitaki District spans both Otago and Canterbury regions, and these requirements may be inconsistent with those of the Canterbury Regional Council. We support open communication with and between the regional councils to agree on provisions to produce consistency within the district. We consider it important to require that activities do not exacerbate natural hazard risks on adjoining sites or create adverse effects to natural hazard mitigation efforts.	We request the submission be allowed.
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.143	Seeks to amend the matters of discretion to include: <u>9. Effects (including reverse sensitivity effects) on natural hazard mitigation measures; and</u> <u>10. The extent to which the activity causes or exacerbates natural hazard risks to surrounding sites and properties</u>	Support	NHC considers it important to require that activities do not exacerbate natural hazard risks on adjoining sites or create adverse effects to natural hazard mitigation efforts.	We request the submission be allowed.
Alliance Group Limited	190.34	NH-R12 Seeks to amend as follows: Critical facilities and regionally significant infrastructure, education facilities, retirement villages, <u>and new</u> buildings containing hazardous substances, <u>and extension or upgrades to existing hazardous facilities where the extension and/or upgrade alters the existing (pre-extension /</u>	Oppose in part	NHC considers that the proposed change from Discretionary to Restricted Discretionary with the included caveats and matters of discretion would be appropriate to reduce the risk from fault rupture. However, we oppose the narrowing of scope to “new buildings” as this would not encompass	We request the part of the submission specifying “new” buildings be disallowed.

		<u>upgrade) location where hazardous substances are stored, used or disposed of onsite or increases the quantity of hazardous substances stored, used or disposed of onsite in the Surface Fault Rupture Hazard Awareness Overlay - Activities and Buildings.</u> All Zones Activity status: <u>Restricted</u> Discretionary <u>Matters of discretion are restricted to:</u> 1) <u>The surface fault rupture risk (likelihood and potential consequences) posed by the fault;</u> 2) <u>The recommendations of a suitably qualified professional for locating or designing the facility to avoid or mitigate potential adverse effects;</u> 3) <u>The provision of an assessment addressing the above, completed by a suitability qualified professional, to Canterbury Regional Council.</u> Notification: Any application made under this rule is precluded from being publicly notified. Note: Section 88 Information Requirements for Applications: Pursuant to Section 88 of the Resource Management Act, any application made under this rule must be accompanied by an assessment of the surface fault rupture risk (likelihood and potential consequences) posed by the fault, undertaken by a suitably qualified professional, including any recommendations for locating or		change of use in an existing building, which may be altered to a hazardous facility or to contain hazardous substances.	
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		designing the facility to avoid or mitigate the potential adverse effects of surface fault rupture. The investigation report must also be supplied to Canterbury Regional Council.			
Federated Farmers of New Zealand Incorporated	246.105	NH-R12 – The submitters seek amendment as follows: Critical facilities and regionally significant infrastructure, education facilities, retirement village and buildings containing hazardous substances hazardous facilities and major hazard facilities in the Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings.	Support	NHC supports using language that is less open to interpretation than “spaces that store hazardous substances” and considers that “hazardous facilities and major hazardous facilities”, as defined in the PDP adequately encompasses the type of structure and activity that should be restricted within the Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings.	We request the submission be allowed.
Waitaki Property Guardians Incorporated	306.46	NH-R12 – Amend rule as follows: ‘Critical facilities and regionally significant infrastructure, education facilities, retirement village and buildings containing hazardous substances hazardous facilities and major hazard facilities in the Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings.’	Support	NHC supports using language that is less open to interpretation than “spaces that store hazardous substances” and considers that “hazardous facilities and major hazardous facilities”, as defined in the PDP adequately encompasses the type of structure and activity that should be restricted within the Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings.	We request the submission be allowed.
Transpower New Zealand Limited	309.95	NH-R12 – Seeks to amend as follows: Critical facilities and regionally significant infrastructure, education facilities, retirement village and buildings containing hazardous substances in the Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings	Oppose	There is no way of predicting exactly how and where a fault will rupture during an earthquake and can result in significant ground movement. As such ground deformation from fault rupture cannot be mitigated or managed except by avoidance. It is important that regionally significant infrastructure, including electrical and	We request the submission be disallowed.

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				communications infrastructure, is able to continue functioning after an earthquake. This is particularly important in districts such as Waitaki with remote communities which are vulnerable to isolation in the wake of an event. As such, NHC recommends that critical facilities and regionally significant infrastructure is avoided within the Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings unless they have a functional need to exist there.	
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.144	NH-R2 – Seeks to amend the matters of discretion to include: <u>9. Effects (including reverse sensitivity effects) on natural hazard mitigation measures; and</u> <u>10. The extent to which the activity causes or exacerbates natural hazard risks to surrounding sites and properties</u>	Support	NHC considers it important to require that activities do not exacerbate natural hazard risks on adjoining sites or create adverse effects to natural hazard mitigation efforts.	We request the submission be allowed.
Canterbury Regional Council	271.265	NH-R4 – Amend 'Earthworks excluding land disturbance in all Flood Assessment Overlays' as this rule permits some earthworks that fall below arbitrary thresholds and requires consent for earthworks exceeding these thresholds. This means that some earthworks that could cause off-site flood effects will be allowed without control of effects, and some earthworks that cause no effects will require resource consent. NH-R4 Earthworks, buildings, and structures	Support	NHC considers it important to require that earthworks do not exacerbate flooding and other natural hazard risks on adjoining sites. We support changes to NH-R4 which will encompass all earthworks which may displace floodwaters.	We request the submission be allowed.

		excluding land disturbance in all Flood Assessment Overlays Where: PER-1 1. the earthworks do not exceed 10m³ per year and 20m³ cumulatively in any 10 year period; and 2. the earthworks do not involve the filling of more than 200mm above natural ground level; and 3. the earthworks do not involve the cut of more than 500mm below natural ground level; or <u>Flooding will not be worsened on another property through the diversion or displacement of floodwaters</u> PER-2 The earthworks relate to the maintenance, repair, replacement and upgrade of natural hazard mitigation works permitted under NI1-R5. Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with PER-1 and/or PER-2 Matters of discretion are restricted to:			
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		1. location, nature and scale of the earthworks, buildings, and structures and their associated effects; and 2. mitigation of flooding and drainage effects; and 3. effects on land stability, flooding, waterways, ground levels and dispersed effects on and off site.			
Canterbury Regional Council	271.270	Seeks that WDC revises the wording to NH-S1 'Flood assessment certificate' that reflects the approach that is preferred by WDC and the Mackenzie District Council. It is important that the standard refers to a specific flood event magnitude, as referring to 'the assessed flood level' is not sufficiently certain NH-S1 – Amend the 'Flood assessment certificate' as follows: NH-S1 Flood Assessment Certificate Within the Canterbury Flood Assessment Overlay; A flood assessment <u>has been issued (that is valid for three years from the date of issue)</u> certificate shall be provided by Canterbury Regional Council, which specifies: 1. whether or not the building or activity is located on land that is within a High Flood Hazard Area; and 2. the a minimum finished floor level for any new building or structure that is 300mm above the assessed <u>500 year ARI</u> flood level.	Support	NHC supports consistency between districts and regions with regards to land use planning for natural hazard risk reduction and flood hazard management. As such we support aligning standards to with those used by Mackenzie District Council. We support the use of a 500 year ARI flood to set finished floor levels in areas at high risk from flood hazard.	We request the submission be allowed.

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		The flood assessment will be completed with reference to: 1. the most up to date models and maps held by Waitaki District Council or Canterbury Regional Council; and 2. any relevant field information; and 3. any site-specific flood assessment prepared by a suitably qualified and experience professional. Note: Compliance with this standard shall be demonstrated by a flood assessment prepared by a person or organisation that has been certified by the Waitaki District Council as being suitably qualified and experienced. This includes the Canterbury Regional Council.			
Telecommuni cation Companies	244.52	INF-R5 – Seeks to amend as follows: INF-R5 Upgrading of infrastructure other than roads <u>and telecommunications facilities</u> in the natural hazard overlay or coastal natural hazard overlay.	Oppose	It is important that regionally significant infrastructure, including electrical and communications infrastructure, is able to continue functioning after an earthquake. This is particularly important in districts such as Waitaki with remote communities which are vulnerable to isolation in the wake of an event. As such, NHC recommends that critical facilities and regionally significant infrastructure is avoided within the natural hazard overlays unless there is no practicable alternative location.	We request the submission be disallowed.
Infrastructure					

Te Rūnanga o Waihao, Te Rūnanga o Moeraki	251.105	The submitter notes how INF-R5 applies to infrastructure upgrades in natural hazard overlays and notes permitted status where certain standards are met. The submitter questions the relevance of offsetting and compensation measures and highlights the absence of rules for hard protection structures; and the relevance of the HAZ provisions of the pORPS to upgrading of infrastructure in hazard mapped areas, in particular those relating to hard protection structures for which the Waitaki PDP HAZ-NH chapter does not provide any policies or rules. Seeks to amend as follows: - Clarify the relevance of offsetting and compensation measures for upgrading in a hazard mapped area - Insert under the matters of discretion wording to the effect of: 1. the level of risk to people, property, the environment and infrastructure, <u>including any risk displaced offsite</u>; and ... <u>6. the extent to which the infrastructure upgrade will improve the resilience of the infrastructure to the hazard.</u> - Consequential amendment to INF-S1 to include as new 11(c) wording to the effect of: <u>c. must not create a new hard protection structure, or increase the footprint of an existing hard protection structure by greater than [insert</u>	Support in part	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS (proposed Otago Regional Policy Statement). However, we acknowledge that Waitaki District spans both Otago and Canterbury regions, and these requirements may be inconsistent with those of the Canterbury Regional Council. We support open communication with and between the regional councils to agree on provisions to produce consistency within the district. We support requiring updates to infrastructure to consider the potential risk displaces onto other sites, and the extent that the update will improve resilience of the infrastructure the effects of natural hazards.	We request the part of the submission concerning subsections 1 and 6 of the provision be allowed.
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		percentage] % * [*further information required to identify suitable percentage]			
Telecommuni cation Companies	244.53	INF-R6 – Seeks to amend as follows: INF-R6 New infrastructure located in the natural hazard overlay or coastal natural hazard overlay, <u>excluding telecommunications facilities</u>, roads, walkways, cycleways and shared paths, and transmission lines and new transformers, substations, switching station and ancillary buildings for the electricity network, and water and wastewater treatment plants	Oppose	It is important that regionally significant infrastructure, including electrical and communications infrastructure, is able to continue functioning after an earthquake. This is particularly important in districts such as Waitaki with remote communities which are vulnerable to isolation in the wake of an event. As such, NHC recommends that critical facilities and regionally significant infrastructure is avoided within natural hazard overlays unless there is no practicable alternative location.	We request the submission be disallowed.
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.107	INF-R6 – Considers clearer guidance on the use of offsetting and compensation measures is needed and a greater focus on risk and resilience. Also notes that the HAZ provisions of the pPORPS are relevant to upgrading of infrastructure in hazard mapped areas, in particular those relating to hard protection structures for which the Waitaki PDP HAZ-NH chapter does not provide any policies or rules Seeks to amend as follows: - Clarify the relevance of offsetting and compensation measures for upgrading in a hazard mapped area - Insert under the matters of discretion wording to the effect of:	Support in part	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS. However, we acknowledge that Waitaki District spans both Otago and Canterbury regions, and these requirements may be inconsistent with those of the Canterbury Regional Council. We support open communication with and between the regional councils to agree on provisions to produce consistency within the district. We support requiring updates to infrastructure to consider the potential risk displaces onto other sites, and the extent that the update will	We request the part of the submission concerning subsections 1 and 6 of the provision be allowed.

		1. the level of risk to people, property, the environment and infrastructure, <u>including any risk displaced offsite</u>; and ... 6. <u>the extent to which the infrastructure upgrade will improve the resilience of the infrastructure to the hazard.</u>		improve resilience of the infrastructure the effects of natural hazards.	
Earthworks					
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.325	EW(Q)-P2 – Considers that the effects list for restricted-use quarries is too limited and excludes key environmental and cultural concerns Seeks amendments to include reference to the following effects: • Effects on sensitive environments • Effects on sensitive activities • Effects relating to sediment and stormwater management • Effects on land stability and natural hazard risks.	Support	NHC supports the inclusion of effects on sediment and stormwater management, and effects on land stability and natural hazard risk when enabling quarrying activities.	We request the submission be allowed.
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.330	CON-2 – Seeks to amend as follows: The quarry operator can demonstrate that the quarry is an existing and lawfully established quarry that has been used at least once in the <u>past five years prior to 1 March 2025</u>; Add the following matters of control: <u>x. Measures to manage sediment and stormwater</u> <u>y. Mitigation of effects on land stability and natural hazard risks</u>	Support	NHC supports the inclusion of effects on sediment and stormwater management, and effects on land stability and natural hazard risk when enabling quarrying activities.	We request the submission be allowed.

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Dogterom Hohepa Ltd	283.121	EW-P7 – Seeks to amend EW-P7 as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site <u>in a sensitive environment, and after rehabilitation</u>; and 3. natural landforms; and 4. local amenity values <u>beyond the boundary of the site</u>; and 5. erosion and sediment loss from the site; and 6. natural hazard risk; and 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and 9. soil quality.	Oppose in part	Natural landforms can help to mitigate the risk from natural hazards. Dune systems, for example, can reduce coastal erosion and the impact of coastal flooding³, and wetlands can reduce the impacts of flooding⁴ As such, NHC considers it important to avoid, remedy or mitigate adverse effects on natural hazard risk and natural landforms when managing earthworks. ³ https://www.orc.govt.nz/managing-natural-hazards/types-of-natural-hazards/coastal-erosion/ ⁴ https://www.doc.govt.nz/nature/habitats/wetlands/why-wetlands-are-important/	We request the part of the submission regarding natural hazards and natural landforms be disallowed.
Dogterom Duntroon Ltd	284.118	EW-P7 – Seeks to amend as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site <u>in a sensitive environment, and after rehabilitation</u>; and	Oppose	Natural landforms can help to mitigate the risk from natural hazards. Dune systems, for example, can reduce coastal erosion and the impact of coastal flooding³, and wetlands can reduce the impacts of flooding⁴ As such, NHC considers it important to avoid, remedy or mitigate adverse effects on natural hazard risk and natural landforms when managing earthworks.	We request the part of the submission regarding natural hazards and natural landforms submission be disallowed.

		3. natural landforms; and 4. local amenity values <u>beyond the boundary of the site</u>; and 5. erosion and sediment loss from the site; and 6. natural hazard risk; and 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and 9. soil quality.		³ https://www.orc.govt.nz/managing-natural-hazards/types-of-natural-hazards/coastal-erosion/ ⁴https://www.doc.govt.nz/nature/habitats/wet-lands/why-wetlands-are-important/	
P K M Farms Limited	287.128	EW-P7 – Seeks to amend as follows: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site <u>in a sensitive environment, and after rehabilitation</u>; and 3. natural landforms; and 4. local amenity values <u>beyond the boundary of the site</u>; and 5. erosion and sediment loss from the site; and 6. natural hazard risk; and 7. the stormwater management systems; and	Oppose	Natural landforms can help to mitigate the risk from natural hazards. Dune systems, for example, can reduce coastal erosion and the impact of coastal flooding³, and wetlands can reduce the impacts of flooding⁴ As such, NHC considers it important to avoid, remedy or mitigate adverse effects on natural hazard risk and natural landforms when managing earthworks. ³ https://www.orc.govt.nz/managing-natural-hazards/types-of-natural-hazards/coastal-erosion/	We request the part of the submission regarding natural hazards and natural landforms submission be disallowed.

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		8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and 9. soil quality.		⁴ https://www.doc.govt.nz/nature/habitats/wetlands/why-wetlands-are-important/	
Parkside Holdings Ltd	297.101	EW-P7 – Amend: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site <u>in a sensitive environment, and after rehabilitation</u> ; and 3. natural landforms; and 4. local amenity values <u>beyond the boundary of the site</u> ; and 5. erosion and sediment loss from the site; and 6. natural hazard risk; and 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and 9. soil quality.	Oppose	Natural landforms can help to mitigate the risk from natural hazards. Dune systems, for example, can reduce coastal erosion and the impact of coastal flooding ³ , and wetlands can reduce the impacts of flooding ⁴ As such, NHC considers it important to avoid, remedy or mitigate adverse effects on natural hazard risk and natural landforms when managing earthworks. ³ https://www.orc.govt.nz/managing-natural-hazards/types-of-natural-hazards/coastal-erosion/ ⁴ https://www.doc.govt.nz/nature/habitats/wetlands/why-wetlands-are-important/	We request the part of the submission regarding natural hazards and natural landforms submission be disallowed.
Twin Terraces Ltd & Cayuga Ltd	299.118	EW-P7 – Amend: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and	Oppose	Natural landforms can help to mitigate the risk from natural hazards. Dune systems, for example, can reduce coastal erosion and the impact of coastal flooding ³ , and wetlands can reduce the impacts of flooding ⁴	We request the part of the submission regarding natural hazards and natural landforms

		2. the visual amenity values of the site <u>in a sensitive environment, and after rehabilitation</u>; and 3. natural landforms; and 4. local amenity values <u>beyond the boundary of the site</u>; and 5. erosion and sediment loss from the site; and 6. natural hazard risk; and 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and 9. soil quality.		As such, NHC considers it important to avoid, remedy or mitigate adverse effects on natural hazard risk and natural landforms when managing earthworks. ³ https://www.orc.govt.nz/managing-natural-hazards/types-of-natural-hazards/coastal-erosion/ ⁴ https://www.doc.govt.nz/nature/habitats/wetlands/why-wetlands-are-important/	submission be disallowed.
Springbank	312.84	EW-P7 – Amend: Manage any earthworks to avoid, remedy or mitigate adverse effects on the following: 1. the stability of land, buildings and structures at or beyond the boundary of the site; and 2. the visual amenity values of the site <u>in a sensitive environment, and after rehabilitation</u>; and 3. natural landforms; and 4. local amenity values <u>beyond the boundary of the site</u>; and 5. erosion and sediment loss from the site; and	Oppose	Natural landforms can help to mitigate the risk from natural hazards. Dune systems, for example, can reduce coastal erosion and the impact of coastal flooding³, and wetlands can reduce the impacts of flooding⁴ As such, NHC considers it important to avoid, remedy or mitigate adverse effects on natural hazard risk and natural landforms when managing earthworks.	We request the part of the submission regarding natural hazards and natural landforms submission be disallowed.

		6. natural hazard risk; and 7. the stormwater management systems; and 8. dust, lighting, odour, vibration, noise and traffic beyond the boundaries of the site; and 9. soil quality.		³ https://www.orc.govt.nz/managing-natural-hazards/types-of-natural-hazards/coastal-erosion/ ⁴https://www.doc.govt.nz/nature/habitats/wetlands/why-wetlands-are-important/	
Definitions					
Federated Farmers of New Zealand Incorporated	246.12	Coastal hazard sensitive activity – Amend the definition of coastal hazard sensitive activities as follows OR with wording with similar intent. 13. indoor/outdoor intensive primary production activities that involve water, wastewater and stormwater treatment systems (and excluding stock water supply); 14. storage of hazardous substances <u>Hazardous facilities and major hazard facilities</u>;	Support in part	NHC supports using language that is less open to interpretation than “spaces that store hazardous substances” and considers that “hazardous facilities and major hazardous facilities”, as defined in the PDP adequately encompasses the type of structure and activity that should be restricted within the Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings.	We request part of the submission be allowed.
Director-General of Conservation	194.7	Notes that the PDP does not provide a definition of ‘Coastal natural hazard’, meaning that the interrelationship of the Natural Hazard and Coastal Environment provisions is unclear. It would improve clarity and certainty if a definition was provided, and the definition in the proposed Otago RPS would ensure consistency with that document. Add a definition for ‘Coastal natural hazard’ as follows (or words to similar effect): <u>“means a subset of natural hazards covering tidal or coastal storm inundation, rising sea level,</u>	Support	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS. We consider that a definition of “coastal natural hazard” is required in line with the provisions in the pORPS. We consider that consistent language and definitions across regional and district plans are important for clarity and useability.	We request the submission be allowed.

		<u>tsunami or meteorological tsunami inundation, coastal erosion (shorelines or cliffs), rise in groundwater levels from storm tides and sea-level rise (plus associated liquefaction), and salinisation of surface fresh waters and groundwater aquifers”</u>			
Canterbury Regional Council	271.39	Natural hazard mitigation works – Supports in part the 'Natural hazard mitigation works' definition, however the definition needs to clearly include all flood and erosion protection works (flood resilience work), including associated river enhancement works, structures, earthworks, planting and vegetation clearance undertaken by councils. Amend definition as follows: means structures and associated engineering earthworks <u>works, plantings, and vegetation clearance</u> to prevent or control the impacts of natural hazards and includes both soft engineering natural hazard mitigation and hard engineering natural hazard mitigation.	Support	NHC supports including all flood and erosion protection works (i.e. ‘works’) undertaken by councils in the definition of “Natural hazard mitigation works”.	We request the submission be allowed.
Coastal Environment					
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.273	CE-O6 – Considers that the objective focuses too narrowly on preventing increased hazard risk without ensuring development occurs in appropriate locations. Seeks to amend as follows: CE-O6: <u>New subdivision, use and development</u> subject to	Support	NHC supports locating and managing subdivision, use and development to avoid increasing natural hazard risk. We support avoidance policies for subdivision, use and development in areas at risk from high hazards.	We request the submission be allowed.

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		Coastal natural hazard risks and new subdivision, use and development Subdivision, use and development <u>are located and managed to avoid increasing</u> does not increase the risk of social, economic or environmental harm from coastal natural hazards.			
Otago Regional Council	259.79	Seeks to add new objective as follows: <u>CE-Ox</u> <u>Natural hazard mitigation activities undertaken by the district or regional authority are enabled to be located in the Coastal Environment where there is a functional need.</u>	Support	While we support prioritisation of natural hazard risk mitigation methods other than hard engineering structures, we acknowledge there needs to be provision for enabling natural hazard mitigation activities to protect structures and activities which have a functional need to exist within areas at risk from natural hazards.	We request the submission be allowed.
Otago Regional Council	259.81	CE-P17 – Seeks to amend to include an additional clause as follows: <u>(3) Enable natural hazard mitigation works within the coastal environment where these activities have functional need to occur in the coastal environment.</u>	Support	While we support prioritisation of natural hazard risk mitigation methods other than hard engineering structures, we support enabling natural hazard mitigation activities to protect infrastructure and activities which has a functional need to exist within areas at risk from natural hazards.	We request the submission be allowed.
Dogterom Thomson Ltd	282.278	CE-P18 – Seeks to amend as follows: Avoid Enable hard protection structures unless where: ... 5. where they are to protect private land, they are not located on public land, except where they provide a significant public benefit.	Oppose	Earthworks and other hard engineering methods to mitigate the risk from coastal natural hazards are necessary in some areas to protect critical infrastructure and activities which have a functional need to exist in at risk areas. However, earthworks and hard engineering structures can increase risk on adjoining sites, create residual risk, and lead to reliance on	We request the submission be disallowed.

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				earthworks to maintain use which is not sustainable long term. As such NHC considers it appropriate for policies regarding earthworks and hard protection structures in areas subject to coastal natural hazard risk to be framed from an avoidance first standpoint.	
Springbank	312.139	CE-P18 – Seeks the following amendments Avoid <u>Enable</u> hard protection structures unless where: ... 5. where they are to protect private land. they are not located on public land, except where they provide a significant public benefit.	Oppose	Earthworks and other hard engineering methods to mitigate the risk from coastal natural hazards are necessary in some areas to protect critical infrastructure and activities which have a functional need to exist in at risk areas. However, earthworks and hard engineering structures can increase risk on adjoining sites, create residual risk, and lead to reliance on earthworks to maintain use which is not sustainable long term. As such NHC considers it appropriate for policies regarding earthworks and hard protection structures in areas subject to coastal natural hazard risk to be framed from an avoidance first standpoint.	We request the submission be disallowed.
Waitaki Property Guardians Incorporated	306.166	CE-P8 – Seeks to amend as follows: <u>New</u> Buildings and structures within the coastal margin Avoid <u>new</u> buildings and structures within the coastal margin unless they have a functional need	Oppose	NHC supports avoidance policies for use and development within areas at risk from natural hazards. The coastal environment is subject to rapidly changing conditions and natural hazards, which will worsen in the future with the effects	We request the submission be disallowed.

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		or operational need for their location <u>or the risk can be adequately mitigated</u>		of climate change and sea level rise. Physical and engineered mitigation of today's coastal hazards is not likely to remain adequate in the near or mid-future. As such, we do not consider it appropriate to allow new buildings and structures to be built within coastal margins, even with mitigation efforts, unless there are no other feasible or practicable alternatives to locating inside the area; and there are the operational needs or functional needs for the location of the facility or infrastructure.	
Dogterom Thomson Ltd	282.284	CE-R4 – Seeks to amend as follows: PER-1 The earthworks are undertaken by Waitaki District Council, Otago Regional Council, Canterbury Regional Council, or their agents, and are for the protection or restoration of natural defences <u>or hard protection structures</u> against coastal natural hazards; or	Oppose	Earthworks and hard protection structures can increase risk on adjoining sites, create residual risk, and lead to reliance on earthworks to maintain use which is not sustainable long term. We consider that earthworks and hard protection structures to protect against coastal natural hazards or to protect and restore natural defences should only be undertaken by public authorities (i.e. regional and district councils) or via consent, where there is a functional need for a critical activity to exist within a hazardous area.	We request the submission be disallowed.
Springbank	312.145	CE-R4 – Seeks the following amendments Earthworks within a coastal natural hazard overlay All zones	Oppose	Earthworks and hard protection structures can increase risk on adjoining sites, create residual risk, and lead to reliance on earthworks to maintain use which is not sustainable long term.	We request the submission be disallowed.

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		Activity status: Permitted Where: PER-1 The earthworks are undertaken by Waitaki District Council, Otago Regional Council, Canterbury Regional Council, or their agents, and are for the protection or restoration of natural defences <u>or hard protection structures</u> against coastal natural hazards; or		We consider that earthworks and hard protection structures to protect against coastal natural hazards or to protect and restore natural defences should only be undertaken by public authorities (i.e. regional and district councils) or via consent where there is a functional need for a critical activity to exist within a hazardous area.	
Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	251.287	Seeks to insert a new policy which gives effect to pORPS HAZ-NH-P11 and MW-P4 for coastal hazard risks. Alternatively, seeks to refer to the relief sought in relation to CE-P13 (above) and insert into CE-P13 as new subclause (5) wording to the effect of: <u>5. enabling mana whenua, and owners of Māori freehold land in relation to their land, to lead approaches to managing coastal natural hazard risks affecting native reserves and Māori land</u>	Support	NHC supports aligning the Waitaki Proposed District Plan with Natural Hazards provisions in the pORPS.	We request the submission be allowed.