To the Planning Team, Waitaki District Council

Name of submitter: Sarah-Jayne McCurrach

Organisation: Natural Hazards Commission Toka Tū Ake

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Date: 08 May 2025

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

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 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). 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: to facilitate research and education, and to 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. I.e., an existing community being flood- or liquefaction-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 created for the future.

The Waitaki District is at risk from a range of natural hazards such as earthquakes, (including fault rupture and liquefaction), flooding, tsunami, land instability, coastal inundation, coastal erosion, and wildfire. Climate change is expected to increase the frequency and intensity of rainfall events and result in sea level rise, which can in turn increase the impacts from natural hazard events such as flooding and coastal inundation.

NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. The Proposed District Plan contains provisions that we support in this regard, and we have provided suggestions in other areas that could be improved.

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 Toka Tū Ake

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

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

To: Waitaki District Council

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

Submitter: Natural Hazards Commission Toka Tū Ake (NHC)

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1. This is a submission on the following:

The Proposed District Plan notified on 1/03/2025.

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 Appendices attached is the NHC submission. This submission relates to the Proposed District Plan in its entirety.

5. The submission from NHC is:

NHC supports "is neutral", and opposes the Proposed District Plan to the extent outlined in this submission.

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 the Proposed District Plan. This includes further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Date:	08/05/2025
Address for service:	Natural Hazards Commission Toka Tū Ake PO Box 790, Wellington 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
Natural Hazards				
NH-O1 Natural hazard risk	The risks from natural hazards, including the effects of climate change, and their impact on people, property and the environment is recognised and understood, and avoided or appropriately mitigated.	Support with amendments	We support avoiding or mitigating the risks from natural hazards. We recommend including a definition for what is considered "appropriately mitigated" to avoid confusion and ensure consistent application of rules and policies. A definition for what to consider in appropriate mitigation works could be adapted from Mackenzie District Council's *Plan Change 28 – Hazards and Risks, Historic Heritage and Notable Trees*: *a. The effectiveness of any proposed natural hazard mitigation works and the alternative design options considered, including low impact design.* *b. Any adverse effects on the environment of any proposed mitigation measures.* *c. The extent to which the mitigation works transfer, or create, unacceptable hazard risk to other people, property or infrastructure.*	Include a definition and/or explanation for "appropriately mitigated" for natural hazards. That "appropriately mitigated" is assessed using the following criteria: *a) The effectiveness of any proposed natural hazard mitigation works and the alternative design options considered, including low impact design.* *b) Any adverse effects on the environment of any proposed mitigation measures.* *c) The extent to which the mitigation works transfer, or create, unacceptable hazard risk to other people, property or infrastructure.* *d) The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site.* e) *Whether or not the work would be carried out under the supervision of either a Chartered Professional*

			d. The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site. *e. Whether or not the work would be carried out under the supervision of either a Chartered Professional Engineer with experience in geotechnical engineering or a Professional Engineering Geologist (IPENZ registered).*	*Engineer with experience in geotechnical engineering or a Professional Engineering Geologist (IPENZ registered).*
NH-P1 Identification of natural hazard areas	As information becomes available, identify and map land that may be subject to natural hazards, including taking into account the effects of climate change.	Support	We support updating information that relates to natural hazards as it becomes available and including the effects of climate change. Data and information in relation to natural hazards and climate change is constantly being improved and updated. It is important to use the most up to date information to ensure that natural hazard risk can be managed effectively to reduce the impacts to people and property.	That the provision be retained.
NH-P2 Risk based approach	Avoid subdivision, use and development in areas 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: 1. likelihood of the natural hazard event; and	Support with amendments	We support this provision as it will support risk reduction and reduce the impacts to people and property in future natural hazard events. Specifically, we support the way that the provision considers the effects of climate change and can enable a risk-based approach to land use planning. A risk-based approach requires considering both the likelihood and consequences of an event occurring,	Include a definition and/or metric for an "acceptable level" of risk.

	2. type and characteristics of the natural hazard; and 3. potential consequence of the natural hazard event, including cumulative effects; and 4. effects of climate change; and 5. in relation to critical infrastructure, those matters in NH-P4		which will be considered in the application of this provision. We recommend providing a definition and/or metric for what the Council deems as an "acceptable level" to avoid confusion and ensure consistent application of rules and policies. NHC has developed a Risk Tolerance Methodology[1] that is designed to integrate a risk tolerance assessment into existing risk management approaches. This methodology could be used by the Council to develop a metric to determine "acceptable" levels of risk. [1]NHC Toka Tū Ake Risk Tolerance Methodology.	
NH-P3 Critical facilities and regionally significant infrastructure	Avoid locating critical facilities and regionally significant infrastructure in areas with identified natural hazard risks, unless it can be demonstrated that: 1. there are no other feasible or practicable alternatives to locating inside the area; and 2. there are operational needs or functional needs for the location; and 3. the design and function are resilient to natural hazard risk.	Support	We support avoiding critical facilities and regionally significant infrastructure in areas of known natural hazard risk as this can reduce the impacts to people and property in future natural hazard events.	That the provision be retained.
NH-P4 Natural protection features	Encourage the use, protection, maintenance and enhancement of natural features, buffers and systems, such as	Support	We support utilising natural protection features as these can be used to reduce the impacts to people and	That the provision be retained.

	wetlands and vegetation, which provide protection from natural hazard risk.		property in future natural hazard events.	
NH-P5 Site specific assessment/investigation	A risk assessment will be required for subdivision, use and development in areas subject to risk from natural hazards that takes into account all of the following: 1. the type, frequency and scale of the natural hazard and whether the effects will likely be temporary or permanent; and 2. the type of activity being undertaken and its vulnerability to natural hazard events; and 3. the consequence of a natural hazard event in relation to the proposed activity; and 4. the suitability of any proposed new allotment and intended future use; and 5. the potential effects, including positive effects on public health and safety and other property; and 6. the potential effects, including positive effects on social, cultural and economic well-being; and 7. any exacerbation of an existing natural hazard risk; and 8. any risk reduction or hazard mitigation measures proposed, including relocation and recovery; and	Support	We support requiring a risk assessment for subdivision, use and development in areas subject to natural hazard risk. The requirements outlined for a risk assessment allow for both the likelihood and consequence of a natural hazard. This supports a risk-based approach[1] to natural hazard risk management and will reduce the impact to people and property in future events. [1]Quality Planning. Risk-based approach to planning. https://www.qualityplanning.org.nz/node/809	That the provision be retained.

	9. any opportunities to take an adaptive management approach to addressing the risk.			
NH-P6 Canterbury Flood Assessment Overlay	Except as provided for in NH-P3, avoid subdivision, use and development in the Canterbury Flood Assessment Overlay where a site-specific assessment identifies the site as a High Flood Hazard Area, unless it can be demonstrated that the risks can be mitigated so that: 1. it is not likely to result in loss of life or serious injuries in the event of a natural hazard occurrence; and 2. there is not likely to be significant damage or loss in the event of a natural hazard occurrence; and 3. it is not likely to require new or upgraded hazard mitigation works to mitigate or avoid the natural hazard; and 4. it is not likely to exacerbate the effects of the natural hazard. In all other cases, where the site is not in a High Flood Hazard Area, provide for subdivision, use and development where: 1. significant adverse effects on people and property are avoided; and 2. the use or development is not likely to suffer material damage in a flood event; and 3. new buildings have a floor level that will avoid inundation in a 0.5% Annual	Support with amendments	We support avoiding subdivision for areas that have been identified as being in the Canterbury Flood Assessment Overlay as a High Flood Hazard Area through a site-specific assessment. We also support using the definition of a High Flood Hazard Area as per the Canterbury Regional Policy Statement: flood hazard areas subject to inundation events where the water depth (metres) x velocity (metres per second) is greater than or equal to 1, or where depths are greater than 1 metre, in a 0.2% AEP flood event. However, we recommend that a definition is provided for what the Council deems as “significant adverse effects” to avoid confusion and ensure consistent application of rules and policies.	The Council provides a definition for “significant adverse effects”.

	Exceedance Probability (AEP) flood event or are otherwise designed to mitigate damage to property from a flood event; and 4. spaces that store hazardous substances will not be inundated.			
NH-P7 Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay	Except as provided for in NH-P3, provide for subdivision, use and development in the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay where: 1. significant adverse effects on people and property are avoided; and 2. the use or development is not likely to suffer material damage in a flood event; and 3. new buildings have a floor level that will avoid inundation; and 4. spaces that store hazardous substances will not be inundated.	Support with amendments	We recommend requiring a site-specific assessment in the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay to determine High Flood Hazard Areas, and subsequently avoiding subdivision, use and development in these areas. High Flood Hazard Areas should be defined in the same way as it is for the Canterbury Flood Assessment Overlay: flood hazard areas subject to inundation events where the water depth (metres) x velocity (metres per second) is greater than or equal to 1, or where depths are greater than 1 metre, in a 0.2% AEP flood event. As a result of including a High Flood Hazard Area within this policy, the wording should also be updated to be consistent with NH-P6 Canterbury Flood Assessment Overlay. We also recommend that a definition is provided for what the Council deems as "significant adverse effects" to avoid confusion and ensure consistent application of rules and policies.	That the following amendments be made: Except as provided for in NH-P3, avoid subdivision, use and development in the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay <u>where a site-specific assessment identifies the site as a High Flood Hazard Area, unless it can be demonstrated that the risks can be mitigated so that:</u> <u>1. it is not likely to result in loss of life or serious injuries in the event of a natural hazard occurrence; and</u> <u>2. there is not likely to be significant damage or loss in the event of a natural hazard occurrence; and</u> <u>3. it is not likely to require new or upgraded hazard mitigation works to mitigate or avoid the natural hazard; and</u> <u>4. it is not likely to exacerbate the effects of the natural hazard.</u> <u>In all other cases, where the site is not in a High Flood Hazard Area, provide for subdivision, use and development where:</u>

				1. significant adverse effects on people and property are avoided; and 2. the use or development is not likely to suffer material damage in a flood event; and 3. new buildings have a floor level that will avoid inundation in a 0.5% Annual Exceedance Probability (AEP) flood event or are otherwise designed to mitigate damage to property from a flood event; and 4. spaces that store hazardous substances will not be inundated. The Council provides a definition for "significant adverse effects".
NH-P8 Moeraki Land Instability Overlay	1. Avoid subdivision, use and development in the Very High Risk and High Risk Moeraki Land Instability Overlay areas, unless a geotechnical assessment can demonstrate that the risk can be mitigated to an acceptable level; and 2. manage subdivision, use and development in the Low Risk and Very Low Risk Moeraki Land Instability Overlay areas where a geotechnical assessment can demonstrate that the risk can be mitigated to an acceptable level.	Support with amendments	We support avoiding development in the Very High Risk and High Risk Moeraki Land Instability Overlay area and managing subdivision, use and development in the Low Risk and Very Low Risk areas. We recommend providing a definition and/or metric for what the Council deems as an "acceptable level" of risk to avoid confusion and ensure the consistent application of rules and policies. NHC has developed a Risk Tolerance Methodology[1] that is designed to integrate a risk tolerance assessment into existing risk management approaches. This methodology could be used by the Council to develop a	A definition and/or metric for an "acceptable level" of risk is included.

			metric to determine "acceptable" levels of risk. [1]NHC Toka Tū Ake Risk Tolerance Methodology.	
NH-P9 Surface Fault Rupture Hazard Awareness Overlay – Subdivision	1. Require applications for subdivision of sites that are identified within the Surface Fault Rupture Hazard Awareness Overlay — Subdivision to identify and map a fault avoidance zone at a site-specific scale; and 2. provide for subdivision in the Surface Fault Rupture Hazard Awareness Overlay - Subdivision, where any future allotments, buildings and infrastructure can be set back from any fault avoidance zone to mitigate the potential effects of fault rupture to an acceptable level; and 3. avoid subdivision in instances where future allotments, buildings and infrastructure cannot set back from any fault avoidance zone.	Support with amendments	We support requiring a fault avoidance zone at a site-specific scale and ensuring that all subdivision avoids this zone, as this will reduce the impacts to people and property in future earthquake events. We recommend following MfE's guidance document for planning around active fault traces[1] and ensuring setback of future allotments, buildings and infrastructure is at least 20m from the fault. However, we recommend providing a definition for what the Council deems an "acceptable level" to reduce confusion and ensure the consistent applications of rules and policies. NHC has developed a Risk Tolerance Methodology[2] that is designed to integrate a risk tolerance assessment into existing risk management approaches. This methodology could be used by the Council to develop a metric to determine "acceptable" levels of risk. [1]Ministry for the Environment. (2003). Planning for Development of Land on or Close to Active Faults.	That the following amendment be made: 2. provide for subdivision in the Surface Fault Rupture Hazard Awareness Overlay – Subdivision, where any future allotments, buildings and infrastructure can be set back at least 20m from any fault avoidance zone to mitigate the potential effects of fault rupture to an acceptable level; and A definition for what the Council deems as an "acceptable level" of mitigation of the potential effects from fault rupture is included.

			[2]NHC Toka Tū Ake Risk Tolerance Methodology.	
NH-P10 Surface Fault Rupture Hazard Awareness Overlay – Activities and Buildings	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.	Support with amendments	We support demonstrating that any potential effects of fault rupture be avoided. However, we recommend requiring a site-specific fault avoidance zone to be mapped and removing the option for the potential effects of fault rupture to be mitigated. The effects from fault rupture include significant ground movement (often >5m of horizontal movement[1]), which would destroy buildings and infrastructure. There is no way of accurately predicting how and where ground deformation will occur in an earthquake, as each earthquake event is unique. As such, the potential damage from ground movement to property located along a fault cannot be mitigated[1] and to reduce impacts to people and property these areas must be avoided. [1]Ministry for the Environment. (2003). Planning for Development of Land on or Close to Active Faults.	That the following amendments be made: 1. 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 identify and map a fault avoidance zone at a site-specific scale; and ~~to demonstrate that any potential effects of fault rupture are avoided or mitigated as far as practicable.~~ 2. Avoid critical facilities and regionally significant infrastructure, education facilities, retirement village and buildings containing hazardous substances within the Surface Fault Rupture Hazard Awareness Overlay unless it can be demonstrated that the site is at least 20m away from the fault.
NH-P11 Liquefaction Assessment Overlay	Provide for subdivision in the Liquefaction Assessment Overlay where it can be demonstrated that the potential risk of liquefaction is mitigated to an acceptable level.	Support with amendments	We support reducing the potential risk from liquefaction in the Liquefaction Assessment Overlay as this can reduce the impacts to people and property in future natural hazard events. However, we recommend providing a definition and/or metric for what the Council deems as an “acceptable level” to avoid confusion and ensure the	A definition and/or metric for an “acceptable level” of risk is included.

			consistent application of rules and policies. NHC has developed a Risk Tolerance Methodology[1] that is designed to integrate a risk tolerance assessment into existing risk management approaches. This methodology could be used by the Council to develop a metric to determine "acceptable" levels of risk. [1]NHC Toka Tū Ake Risk Tolerance Methodology.	
NH-P12 Wildfire – subdivision and land use	Ensure that subdivision and land use in areas where there is actual or potential risk to people and property from wildfire achieve appropriate setbacks and mitigate the risk to an acceptable level and the wildfire risk to existing buildings from the establishment of new woodlots, shelterbelts and plantation forestry is minimised.	Support with amendments	We support requiring a setback in areas exposed to risk from wildfires and ensuring that the risk is mitigated. However, we recommend providing a definition for what the Council deems as "appropriate setbacks" and an "acceptable level" to avoid confusion and ensure consistent application of rules and policies. FENZ provides guidance[1] for protecting homes that are in the urban/rural interface and exposed to wildfire risk. This guidance could be used for establishing "appropriate setbacks" of 30m for residential properties. NHC has developed a Risk Tolerance Methodology[2] that is designed to integrate a risk tolerance assessment into existing risk management approaches. This methodology could be used by the Council to develop a	Include a definition for "appropriate setbacks". Include a definition and/or metric for an "acceptable level" of risk is included.

			metric to determine "acceptable" levels of risk. [1]Fire and Emergency New Zealand. Get fire safe at the interface. [2]NHC Toka Tū Ake Risk Tolerance Methodology.	
NH-P13 Other natural hazard awareness overlays	Encourage 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 to an acceptable level.	Support with amendments	We support the assessment of natural hazard risk and incorporating methods to reduce or mitigate risk in proposals for subdivision, use and development. However, we recommend making this a requirement for all proposals rather than just encouraging it. A requirement ensures that natural hazard risk is assessed and options for reduction and mitigation are considered for all subdivisions, use and development in natural hazard awareness overlays, which can reduce the impact to people and property in future events. We also recommend providing a definition and/or metric for what the Council deems an "acceptable level" to avoid confusion and ensure consistent application of rules and policies. NHC has developed a Risk Tolerance Methodology[1] that is designed to integrate a risk tolerance assessment into existing risk management approaches. This methodology could be used by the Council to develop a	That the following amendments be made: Require ~~Encourage~~ 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 to an acceptable level. A definition and/or metric for what the Council deems as an "acceptable level" of risk is included.

			metric to determine "acceptable" levels of risk. [1]NHC Toka Tū Ake Risk Tolerance Methodology	
NH-R1 Buildings, structures and fences in the Otago Flood Assessment Overlay	Activity status: Permitted Where: PER-1 The building or structure is: 1. a below ground swimming pool; or 2. a deck; or 3. an unenclosed building without a floor; or 4. a post and wire or post and rail fence; or 5. a farm building in a Rural Zone that has an unsealed or pervious floor; or PER-2 The building activity is for the maintenance, repair or alteration of an existing building and does not increase the building footprint; or PER-3 Any building is not greater than 10m in area and the cumulative area of additions does not exceed 20m over a 10-year period. Activity status when compliance is not achieved: Restricted Discretionary	Support with amendments	We support PER-1, PER-2, and PER-3 as the specified buildings, structures, and fences are not critical infrastructure and do not constitute the main habitable parts of a building where people spend a large amount of time. Having these as a permitted activity in the Otago Flood Assessment Overlay will not increase the risk to people, property, and the community. We recommend including a condition as part of PER-3 that means buildings are only permitted when they are outside of a High Flood Hazard Area (as per our recommendations to provision NH-P7). Avoiding any development within a High Flood Hazard Area will reduce the impact to people and property in future flood events. The requested changes to PER-3 will make this rule consistent with NH-R2 for buildings and structures within the Canterbury Flood Assessment Overlay. We also support the matters of discretion where compliance is not achieved with PER-1, PER-2, and/or PER-3 as these have the ability to reduce the impacts to people and property in future flood events.	That the following amendment be made: PER-3 ~~Any building is not greater than 10m in area and the cumulative area of additions does not exceed 20m over a 10-year period.~~ 1. any building has a finished floor level equal to or higher than the minimum floor level specified in a flood assessment prepared in accordance with NH-S1; and 2. is not located in a High Flood Hazard Area as determined in a flood assessment prepared in accordance with NH-S1.

	Where: RDIS-1 Compliance is not achieved with any of PER-1, PER-2, and/or PER-3 Matters of discretion are restricted to: 1. mitigation of flooding effects; and 2. floor levels; and 3. access, including safe egress from the site/building; and 4. risk to people, property and the environment during a flood event; and 5. flooding effects/displacement of flood waters on and/or off site; and 6. effects of any proposed mitigation; and 7. the intended use of the building or structure; and 8. any storage of hazardous substances			
NH-R2 Buildings, structures and fences in the Canterbury Flood Assessment Overlay	Activity status: Permitted Where: PER-1 The building or structure is: 1. a below ground swimming pool; or 2. a deck; or 3. an unenclosed building without a floor; or	Support	We support buildings, structures and fences in the Canterbury Flood Assessment Overlay being a permitted activity if they comply with PER-1, PER-2, and/or PER-3, as the buildings and structures do not constitute the main habitable parts of a building where people spend large amount of time. Therefore, having these as a permitted activity in the Canterbury Flood Assessment Overlay will not increase	That the provision be retained.

	4. a post and wire or post and rail fence; or 5. a farm building in a Rural Zone that has an unsealed or pervious floor; or PER-2 The building activity is for the maintenance, repair or alteration of an existing building; and does not increase the building footprint; or PER-3 1. any building has a finished floor level equal to or higher than the minimum floor level specified in a flood assessment prepared in accordance with NH-S1; and 2. is not located in a High Flood Hazard Area as determined in a flood assessment prepared in accordance with NH-S1. Activity status when compliance is not achieved: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with PER-1 and/or PER-2; and RDIS-2 Compliance is not achieved with PER-3 and the building, structure or fence is not located in a High Flood Hazard Area, as determined by a flood		the risk to people, property, and the community. We support the matters of discretion where compliance is not achieved with PER-1, PER-2 and/or PER-3 as these can reduce the impacts to people and property in future flood events. We also support the activity status being non-complying when compliance is not achieved with RDIS-2. Avoiding development in High Flood Hazard Areas is the most effective way to reduce flood risk by limiting the level of exposure.	

	assessment certificate prepared in accordance with NH-S1 Matters of discretion are restricted to: 1. mitigation of flooding effects; and 2. floor levels; and 3. access, including safe egress from the site/building; and 4. risk to people, property and the environment during a flood event; and 5. flooding effects/displacement of flood waters on and/or off site; and 6. effects of any proposed mitigation; and 7. the intended use of the building or structure; and 8. any storage of hazardous substances. Activity status when compliance is not achieved: Non-Complying Where: NC-1 Compliance is not achieved with RDIS-2			
NH-R3 Buildings, structures and fences in the Waitaki River Floodplain Assessment Overlay	Activity status: Permitted Where: PER-1	Support with amendments	We support PER-1 and PER-2 as the specified buildings, structures, and fences are not critical infrastructure and do not constitute the main habitable part of a building where	That the following amendment is made: <u>PER-3</u> <u>1. any building has a finished floor level equal to or higher than the minimum floor</u>

	The building or structure is: 1. a below ground swimming pool; or 2. a deck; or 3. an unenclosed building without a floor; or 4. a post and wire or post and rail fence; or 5. a farm building in a Rural Zone that has an unsealed or pervious floor; or PER-2 The building activity is for the maintenance, repair or alteration of an existing building and does not increase the building footprint. 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: 1. mitigation of flooding effects; and 2. floor levels; and 3. access, including safe egress from the site/building; and		people spend large amount of time. Therefore, having these as a permitted activity in the Waitaki River Floodplain Assessment Overlay will not increase the risk to people, property, and the community. We also support the matters of discretion where compliance is not achieved with PER-1 and PER-2 as these can reduce the impacts to people and property in future flood events. However, we recommend including a condition that means buildings are only permitted when they are outside of a High Flood Hazard Area (as per our recommendations to provision NH-P7). Avoiding any development within a High Flood Hazard Area will reduce the impact to people and property in future flood events.	level specified in a flood assessment prepared in accordance with NH-S1; and 2. is not located in a High Flood Hazard Area as determined in a flood assessment prepared in accordance with NH-S1.

	4. risk to people, property and the environment during a flood event; and 5. flooding effects/displacement of flood waters on and/or off site; and 6. effects of any proposed mitigation; and 7. the intended use of the building or structure; and 8. any storage of hazardous substances.			
NH-R4 Earthworks excluding land disturbance in all Flood Assessment Overlays	Activity status: Permitted Where: PER-1 1. the earthworks do not exceed 10m per year and 20m 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 PER-2 The earthworks relate to the maintenance, repair, replacement and upgrade of natural hazard mitigation works permitted under NH-R5. Activity status when compliance is not achi eved: Restricted Discretionary Where:	Support	We support this activity being permitted where it complies with PER-1 and PER-2 and restricted discretionary where compliance is not achieved. We also support the matters of discretion as they have the ability to manage risk to people and property in future flood events.	That the provision be retained.

	RDIS-1 Compliance is not achieved with PER-1 and/or PER-2 Matters of discretion are restricted to: 1. location, nature and scale of the earthworks; 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.			
NH-R5 Natural hazard mitigation works in all Flood Assessment Overlays – maintenance, repair, replacement and upgrading	Activity status: Permitted Where: PER-1 The natural hazard mitigation works are within 25m of the existing alignment or location, vertically and horizontally; and PER-2 The footprint of the natural hazard mitigation works is not increased by more than 25%; and PER-3 The activity is undertaken by or on behalf of Canterbury Regional Council, Otago Regional Council or Waitaki District Council. Activity status when compliance is not achieved:	Support	We support this activity being permitted if it achieves compliance with PER-1, PER-2, and/or PER-3 and restricted discretionary status if compliance is not achieved. We also support the matters of discretion. These activity statuses allow for any necessary natural hazard mitigation works while also ensuring that they will not further increase flood risk.	That the provision be retained.

	Restricted Discretionary Where: RDIS-1 Compliance is not achieved with PER-1, PER-2 and/or PER-3 Matters of discretion are restricted to: 1. the likely effectiveness of the natural hazard mitigation works and the need for them; and 2. the extent of any adverse social, cultural and environmental effects, including on any sensitive environments; and 3. any potential adverse effects of diverting or blocking overland flow path(s), including upstream and down stream flood risks; and 4. any increased flood risk for people, property, or public spaces; and 5. the extent to which alternative locations and options for the natural hazard mitigation works have been considered and the merits of those; and 6. any positive effects of the proposal on the community			
NH-R6 Land use activities in the Canterbury Flood Assessment Overlay, the Otago Flood Assessment Overlay and the Waitaki River	Activity status: Permitted Where: PER-1 The activity is one of the following:	Support	We support the permitted activities as they are not vulnerable to flooding and do not constitute the main habitable part of a building where people spend a large amount of time. Having these as a permitted activity will not increase the	That the provision be retained.

Floodplain Overlay (expect as provided for by NH-R4 and NH-R5)	1. primary production; 2. recreation or leisure activity including sports fields; 3. temporary events; 4. parking and loading areas at ground level or above Activity status: Restricted Discretionary Where: RDIS-1 Compliance is not achieved with PER-1 and if the activity is located within the Canterbury region of the District it is not located in a High Flood Hazard Area is determined in a flood assessment certificate prepared in accordance with NH-S1. Matters of discretion are restricted to: 1. mitigation of flooding effects; and 2. floor levels, including alternative means of complying with any floor level specified in a flood assessment; and 3. methods to manage the activity and people during a flood event; and 4. access, including safe egress from the site/building; and 5. the nature of the activity and the risk and vulnerability to flood events.		risk to people, property, and the community. We support the matters of discretion for restricted discretionary activities as they will ensure that the impacts in flood events are considered before granting consent. We also support the activity status being non-complying when compliance with RDIS-1 is not achieved because this will reduce the impacts to people and property in future flood events.	

	Activity status when compliance is not achieved: Non-Complying Where: NC-1 Compliance is not achieved with RDIS-1			
NH-S1 Flood assessment certificate	Within the Canterbury Flood Assessment Overlay; A flood assessment 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 minimum finished floor level for any new building or structure that is 300mm above the assessed flood level. 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. Activity status when compliance is not achi eved: Non-Complying	Support with amendments	We support requiring a flood assessment certificate for activities within the Canterbury Flood Assessment Overlay. The information that is contained within the flood assessment certificate will determine whether the activity is within a High Flood Hazard Area and any floor level height requirements. Identifying and avoiding High Flood Hazard Areas and raising floor levels are effective ways to reduce the impacts to people and property in future flood events. However, we recommend also requiring a flood assessment certificate for activities within the Otago Flood Assessment Overlay and Waitaki River Floodplain Assessment Overlay to identify High Flood Hazard Areas and minimum floor height requirements. For these hazard overlays, the flood assessment certificate will need to be provided by Otago Regional Council.	That the following amendment be made: Within the Canterbury Flood Assessment Overlay, Otago Flood Assessment Overlay, and Waitaki River Floodplain Assessment Overlay; A flood assessment certificate shall be provided by Canterbury Regional Council, or Otago 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 minimum finished floor level for any new building or structure that is 300mm above the assessed flood level. The flood assessment will be completed with reference to: 1. the most up to date models and maps held by Waitaki District Council, Otago Regional 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.
NH-R8 Building activity in the Moeraki Land Instability Overlay – Very Low Risk and Low Risk Areas	Activity status: Restricted Discretionary Where: RDIS-1 An engineering assessment from a suitably qualified and experienced engineer is provided to WDC to confirm that there are no indicators of slope instability. Matters of discretion are restricted to: 1. potential risk to people, property and the environment, including potential risk off-site; and 2. any mitigation measures proposed; and 3. effects of any mitigation measures; and 4. suitability of any infrastructure to withstand slope movement. Activity status when compliance is not achieved: Non-Complying Where: NC-1 Compliance is not achieved with RDIS-1	Support	We support requiring an assessment from a suitably qualified and experienced engineer to confirm there is no slope instability within the Moeraki Land Instability Overlay – Very Low Risk and Low Risk Areas. We also support the matters of discretion as they will be able to reduce the impacts to people and property from slope instability.	That the provision be retained.
NH-R9 Earthworks and/or building activity in the Moeraki Land Instability	Activity status: Restricted Discretionary Matters of discretion are restricted to:	Support	We support these activities being restricted discretionary and the matters of discretion. This will be able to	That the provision be retained.

Overlay – Moderate Risk Area	1. potential risk to people, property and the environment, including potential risk off-site; and 2. any mitigation measures proposed; and 3. effects of any mitigation measures; and 4. suitability of any infrastructure to withstand slope movement. Activity status when compliance is not achieved: Not Applicable		effectively reduce the impact to people and property from land instability.	
NH-R11 Building activity in the Moeraki Land Instability Overlay – High Risk and Very High Risk Areas	Activity status: Non-Complying	Support	We support building activity being non-complying in High Risk and Very High-Risk areas within the Moeraki Land Instability Overlay. This activity status will avoid development in high-risk areas which will reduce the impact to people and property in future events.	That the provision be retained.
NH-R12 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	Activity status: Discretionary Activity status when compliance is not achieved: Not Applicable	Support with amendments	We support this activity being discretionary only where it can be demonstrated that the activity is at least 20m away from the fault, as recommended by MfE's guidance for land use planning around active faults[1]. Fault rupture is a hazard that causes significant damage and destruction and cannot be mitigated against, which means having a discretionary activity status will reduce the impacts to people and property in future natural hazard events.	That the following amendment be made: 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 Activity status: Discretionary 1. <u>Where it can be demonstrated that the activity is at least 20m away from the fault</u> Activity status when compliance is not achieved:

			[1]Ministry for the Environment (2003). Planning for Development of Land on or Close to Active Faults.	~~Not Applicable~~ Non Complying
NH-R13 – Wildfire – woodlots, shelterbelts, plantation forestry and buildings	Activity status: Permitted Where: PER-1 The woodlot or shelterbelt is no wider than 30m and is setback (as measured from the outside extent of the canopy): 1. 30m from any residential unit or other principal building on an adjoining property; and 2. 30m from any zone that is not a rural zone; and 3. 5m from any adjoining lawfully established accessway to a residential unit or other principal building. PER-2 The plantation forestry is setback (as measured from the outside extent of the canopy): 1. 30m from any residential unit or other principal building on an adjoining property; and 2. 30m from any zone that is not a rural zone; and 3. 5m from any adjoining lawfully established accessway to a residential unit or other principal building.	Support with amendments	We support this being a permitted activity where compliance is achieved with PER-1, PER-2, and/or PER-3 as these will be able to effectively prevent the spread of wildfire as per Fire and Emergency New Zealand guidelines[1]. We also support the matters of discretion if compliance with PER-1, PER-2, and/or PER-3 is not achieved. The matters of discretion ensure that wildfire risk is still adequately considered to reduce the impacts to people and property in future events. However, we recommend confirming whether this rule is intending that the outside extent of the canopy is measured from the mature tree extent. The extent of a tree can vary significantly from initial planting to reaching its full mature extent. Clarifying this rule will avoid confusion and ensure the consistent application of rules and policies. [1]Fire and Emergency New Zealand. Get fire safe at the interface.	That the following amendment be made: Activity status: Permitted Where: PER-1 The woodlot or shelterbelt is no wider than 30m and is setback (as measured from the outside extent of the mature tree canopy):

	PER-3 1. The residential unit or principal building is setback 30m from the outside extent of the canopy of any woodlot, shelterbelt or plantation forestry.			
Coastal Environment				
CE-O5 Climate Change	Recognise and provide for the effects of climate change and its influence on the frequency and severity of coastal natural hazards.	Support	We support recognising and providing for the effects of climate change. Climate change is expected to cause increased intensity of rainfall, ex-tropical cyclones, coastal flooding and erosion, as well as sea level rise in the Waitaki District[1], therefore, recognising its effect on coastal hazards can reduce the impacts to people and property in future events. [1]NIWA. Zone 5: Regional snapshot of projected climate changes and hazards.	That the provision be retained.
CE-O6 Coastal natural hazard risks and new subdivision, use and development	Subdivision, use and development does not increase the risk of social, economic or environmental harm from coastal natural hazards.	Support	We support ensuring that subdivision, use and development does not increase social, economic, or environmental harm from coastal natural hazards.	That the provision be retained.
CE-O7 Coastal natural hazard risks and existing development	The risk of harm to existing development in coastal natural hazard overlays is reduced through natural defences, and the option to relocate buildings and structures to areas outside coastal natural hazard overlays is available	Support	We support reducing the risk of harm to existing developments and providing the option to relocate buildings and structures outside of coastal natural hazard overlays. Reducing existing levels of natural hazard risk is challenging and this objective supports the ability to reduce existing risk and	That the provision be retained.

			reduce the impacts to people and property in natural hazard events.	
CE-P2 Recognise the Importance of the Coastal Environment	Recognise and provide for the following matters of national importance: e. management of significant coastal hazard risks.	Support with amendments	We support recognising and providing for the management of significant coastal natural hazard risks. However, we recommend providing a definition for what the Council deems as "significant coastal hazard risks" to reduce confusion and ensure consistent application of rules and policies.	Include a definition for "significant coastal hazard risks".
CE-P3 Precautionary approach	Adopt a precautionary approach to subdivision, use and development within the Coastal Environment, particularly in relation to potential climate change effects, where the potential adverse effects of those activities are likely to be significant but are also uncertain, unknown or little understood.	Support	We support adopting a precautionary approach to subdivision, use and development within the Coastal Environment. There is uncertainty around the specific effects of climate change on natural hazards and natural hazards within the coastal environment. A precautionary approach will ensure that the impacts to people and property in future events is reduced and prevents any inaction in managing the effects of climate change.	That the provision be retained.
CE-P14 Identify coastal natural hazards	Identify and map areas that may be subject to the following coastal natural hazards, over the next 100 years: 1. Tsunami Hazard; 2. Coastal Inundation; and 3. Coastal Erosion.	Support with amendments	We support mapping these coastal hazards. However, we recommend mapping these hazards over at least the next 100 years. This change would be in line with wording from the New Zealand Coastal Policy Statement[1]. Identifying coastal natural hazards over at least 100 years can also accommodate the effects of climate change and can be used to reduce the impacts to people	That the following amendment be made: Identify and map areas that may be subject to the following coastal natural hazards, over the next <u>at least</u> 100 years: 1. Tsunami Hazard; 2. Coastal Inundation; and 3. Coastal Erosion.

			and property in future natural hazard events. [1]Department of Conservation. New Zealand Coastal Policy Statement.	
CE-P15 Coastal natural hazards risks and new subdivision, use and development.	Avoid new subdivision, coastal hazard sensitive activities and associated buildings and structures within the Coastal Natural Hazard Overlays, unless a site-specific risk assessment demonstrates it will not result in an increased risk of loss of life, or serious injuries, environmental harm, or economic loss in the event of a coastal natural hazard occurrence.	Support with amendments	We support avoiding new subdivision, coastal hazard sensitive activities and associated buildings and structures within the Coastal Natural Hazard Overlays. We also support the provided definition for coastal hazard sensitive activities. However, we recommend amending this to specifying that risk must not be increased to an intolerable level and for the Council to provide a definition for what it deems to be "intolerable risk". An "increased risk" does not acknowledge any instances where the level of risk to loss of life, serious injuries, environmental harm, or economic loss is already high within the Coastal Environment. The best way to reduce the impacts from coastal natural hazards to people and property is to ensure the risk does not reach an intolerable level. NHC has developed a Risk Tolerance Methodology[2] that is designed to integrate a risk tolerance assessment into existing risk management approaches. This methodology could be used by the Council to develop a	That the following amendments be made: Avoid new subdivision, coastal hazard sensitive activities and associated buildings and structures within the Coastal Natural Hazard Overlays, unless a site-specific risk assessment demonstrates it will not result in an intolerable level of risk both now and in the future. ~~creased risk of loss of life, or serious injuries, environmental harm, or economic loss in the event of a coastal natural hazard occurrence~~ Include a definition for an "intolerable level" of risk.

			metric to determine "intolerable" levels of risk. [2]NHC Toka Tū Ake Risk Tolerance Methodology	
CE-P16 Coastal natural hazard risks and existing development	Increase the resilience of exposed communities from coastal natural hazard risks within Coastal Natural Hazard Overlays by: 1. applying an adaptive management approach, which can be adjusted over time and in response to changing risk levels and tolerances or new information; and 2. encouraging and enabling managed retreat, including the relocation or removal of existing buildings or structures from within coastal natural hazards areas to areas outside Coastal Natural Hazard Overlays, when natural defences are not an effective response to risk; and 3. avoiding additions to existing buildings in Coastal Natural Hazard Overlays unless the increase in building footprint is minor and it does not involve the establishment of a new coastal hazard sensitive activity.	Support	We support increasing the resilience of communities exposed to coastal natural hazard risks. The outlined approaches will be able to contribute to managing natural hazard risk and reduce the impacts to people and property in future events. The approaches are also appropriate for managing the effects of climate change and adopting a precautionary approach to coastal natural hazard risk management.	That the provision be retained.
CE-P17 Natural defences against coastal natural hazards	1. Recognise that natural defences are the preferred method to reduce harm from coastal natural hazards; and 2. Enable earthworks undertaken by district or regional councils, for the protection or restoration of natural defences against coastal natural hazards	Support	We support using natural defences to reduce risk from coastal natural hazards. Natural defences are an effective way to mitigate the effects of climate change and can also create added benefits such as increased biodiversity and in some instances can also contribute to removing carbon.[1]	That the provision be retained.

	while ensuring that any exposed areas are appropriately rehabilitated.		[1]Ministry for the Environment (2024). Coastal hazards and climate change guidance.	
CE-P18 Hard protection structures	Avoid hard protection structures unless: 1. they reduce an immediate risk of serious harm to people, property, or infrastructure arising out of coastal natural hazards or if they are the only practical means to protect regionally significant infrastructure; and 2. they would not compromise the function of natural features and systems as natural defences; and 3. they are designed to minimise adverse effects on social, cultural and environmental values of the Coastal Environment; and 4. it is demonstrated that alternative measures would not mitigate the risk to an acceptable level; and 5. where they are to protect private land, they are not located on public land, except where they provide a significant public benefit.	Support with amendments	We support the outlined approach to using hard protection structures as this will ensure that they are effectively used to reduce the impacts to people and property from coastal natural hazards. However, we recommend that the Council provides a definition for what they deem to be "immediate and serious harm" and an "acceptable level" to reduce confusion and ensure the consistent application of rules and policies. NHC has developed a Risk Tolerance Methodology[1] that is designed to integrate a risk tolerance assessment into existing risk management approaches. This methodology could be used by the Council to develop a metric to determine "acceptable" levels of risk. [1]NHC Toka Tū Ake Risk Tolerance Methodology	Include a definition for "immediate and serious harm" Include a definition for an "acceptable level" of risk from coastal hazards.
CE-R3 Relocation or removal of existing buildings or structures within the Coastal Environment	Activity status: Permitted Where: PER-1 The building or structure is not for hazard protection or public access, unless it is being removed by Otago Regional Council,	Support	We support the relocation of buildings or structures outside of the Coastal Environment if they are being removed from any of the coastal natural hazard overlays. Relocation is an effective risk reduction tool that can reduce the impacts to people and property in	That the provision be retained.

	Waitaki District Council or their agents; and PER-2 The site will be rehabilitated and revegetated consistent with the natural character of the coastal environment in which it is located; and PER-3 The building is removed for one of the following reasons: 1. it is located within a coastal natural hazard overlay and is being removed or relocated to be located outside a coastal natural hazard overlay; or 2. it is removed for the purpose of restoring or rehabilitating the natural character of the coastal environment or for the avoidance of natural hazards; and PER-4 All in-ground and above-ground infrastructure and services are removed. Activity status when compliance is not achieved: Discretionary Where: DIS-1 Compliance is not achieved with PER-1, PER-2, PER-3 and/or PER-4		future natural hazard events and manage the effects of climate change.	

CE-R4 Earthworks within a coastal natural hazard overlay	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 against coastal natural hazards; or Activity status when compliance is not achieved: Discretionary Where: DIS-1 Compliance is not achieved with PER-1, PER-2, PER-3 and/or PER-4.	Support	We support earthworks within a Coastal Natural Hazard Overlay to be a permitted activity when they are for the protection or restoration of natural defences against coastal natural hazards as this can contribute to reducing the impacts to people and property in future natural hazard events.	That the provision be retained.
CE-R5 Additions and alterations to existing buildings in a coastal natural hazard overlay	Activity status: Permitted Where: PER-1 The additions and/or alterations do not increase the building footprint by more than 20m ; and PER-2 The additions or alterations do not establish an additional coastal hazard sensitive activity on the site Activity status when compliance is not achieved: Non-Complying Where: NC-1	Support with amendments	We support this being a permitted activity provided PER-1 and PER-2 are complied with. However, we recommend that an additional condition is added to ensure that any additions or alterations to an existing building in a Coastal Natural Hazard Overlay does not constitute a habitable area (i.e. bedroom) of the building. Ensuring the habitable areas of buildings is not increased will reduce the risk to people in future natural hazard events.	That the following amendment be made: Activity status: Permitted Where: PER-1 The additions and/or alterations do not increase the building footprint by more than 20m ; and PER-2 The additions or alterations do not establish an additional coastal hazard sensitive activity on the site; <u>and</u> <u>PER-3</u> <u>The additional and/or alterations do not constitute a habitable area of the building.</u>

	Compliance is not achieved with PER-1 and/or PER-2			
CE-R7 New buildings or structures (excluding hard protection structures) within a coastal natural hazard overlay	Activity status: Restricted Discretionary Where: RDIS-1 The building or structure is not used for a coastal hazard sensitive activity; and RDIS-2 The building is a relocatable building. Matters of discretion are restricted to: 1. the potential for the new building or structure to increase the risk of social, economic or environmental harm arising out of coastal natural hazards; and 2. the proposed risk reduction and hazard mitigation measures; and 3. the impacts on infrastructure, including access and services; and 4. access for emergency services; and 5. the extent to which the proposal increases the burden on civil defence agencies and emergency services; and 6. any requirement to remove buildings, structures or associated services from the site where the site is affected by natural hazards, including the registration of such requirements through legal instruments, such as covenants; and	Support	We support this activity being restricted discretionary and the associated matters of discretion. This activity status can be used to effectively reduce natural hazard risk and impacts to people and property in future natural hazard events.	That the provision be retained.

	7. the positive social, cultural and economic benefits associated with the new building or structure; and 8. any effects on public access. Activity status when compliance is not achi eved: Non-Complying Where: NC-1 Compliance is not achieved with RDIS-1 and/or RDIS-2			
CE-R8 Hard protection structures	Activity status: Discretionary Where: DIS-1 The hard protection structure is to protect Regionally Significant Infrastructure. Activity status when compliance is not achi eved: Non-Complying Where: NC-1 Compliance is not achieved with DIS-1	Support	We support hard protection structures to protect Regionally Significant Infrastructure being a discretionary activity. Hard protection structures such as sea walls can often create additional coastal hazards such as increased erosion in other areas[1].Therefore, hard protection structures as a discretionary activity can reduce the likelihood of them having negative effects on coastal natural hazards. [1]Ministry for the Environment (2024). Coastal hazards and climate change guidance.	That the provision be retained.
CE-R11 Coastal hazard sensitive activities within a	Activity status: Non-Complying	Support	We support coastal hazard sensitive activities being a non-complying activity in a Coastal Natural Hazard Overlay. Coastal hazard sensitive activities are more vulnerable to	That the provision be retained.

coastal natural hazard overlay			experience impacts from natural hazard events and through not allowing them in a Coastal Natural Hazard Overlay the impacts to people and property in future natural hazard events can be reduced.	
Definition – Coastal natural hazard overlays	Means the area/s mapped and identified as a Coastal Inundation Hazard Overlay and/or Coastal Erosion Hazard Overlay.	Support with amendments	We recommend that this definition is expanded to also include the Tsunami Hazard Area Overlay. Although tsunami are a low likelihood event, they can have severe consequences. Land use planning is an effective tool for reducing natural hazard risk and should be utilised to manage the risk from tsunami especially for the Coastal Hazard Sensitive Activities that have been outlined in this plan change.	That the following amendment is made: ... means the area/s mapped and identified as a Coastal Inundation Hazard Overlay, Tsunami Hazard Area Overlay and/or Coastal Erosion Hazard Overlay.