To the Planning Team, Masterton District Council
Name of submitter: Sarah-Jayne McCurrach
Organisation: Toka Tū Ake EQC
Email: resilience@eqc.govt.nz

This is a submission on the Proposed Wairarapa Combined District Plan.

Toka Tū Ake EQC is a Crown Entity responsible for providing insurance to residential property owners against the impact of natural hazards. We also invest in and facilitate research and education about natural hazards, and methods of reducing or preventing natural hazard damage.

The contingent liability associated with natural hazard risk in New Zealand is high and is carried, in large part, by Toka Tū Ake on behalf of the Crown. Toka Tū Ake therefore has a strong interest in reducing risk from, and building resilience to, natural hazards in New Zealand

EQC could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that our submission relates to are:
See attached Table 1

Our submission is:
See Attached Table 1

We seek the following decision from the local authority:
See attached Table 1

I do not wish to be heard in support of my submission.

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Signature of submitter

Date
15 December 2023

Table 1:

<table>
<tr><th>Provision</th><th>Description</th><th>Support/ Oppose/ Amend</th><th>Reasoning</th><th>Requested Action</th></tr>
<tr>
<td>Table NH-1</td>
<td>Hazard Risk Categories
<table>
<tr><th>Hazard category</th><th>Hazard type</th></tr>
<tr><td>High hazard area</td><td>Flood hazard – river corridors</td></tr>
<tr><td>Moderate hazard area</td><td>Flood hazard – overland flow path</td></tr>
<tr><td>Low hazard area</td><td>Flood hazard – ponding
Possible liquefaction-prone area</td></tr>
</table></td>
<td>Amend</td>
<td>Liquefaction does not pose serious threat to life safety but can severely affect the structural integrity and liveability of properties, as was seen in the aftermath of the 2010 and 2011 Canterbury earthquake sequence. Liquefaction should therefore be considered a moderate hazard risk. Liquefaction is a widespread risk in the Wairarapa, as demonstrated in Appendix 1.

We also consider the format in the draft district plan for including fault hazards within the risk categorisation table to be preferable to the system in the Proposed district plan. Removing fault hazard from this table creates confusion on the status of fault hazard areas within the plan, and is not reflected in other parts of the plan, for example NH-R3 makes reference to low and medium fault hazard zones.</td>
<td>Amend to:
<table>
<tr><th>Hazard category</th><th>Hazard type</th></tr>
<tr><td>High hazard area</td><td>Flood hazard – river corridors
<u>Fault avoidance area – higher recurrence interval faults (≤3500 years)</u></td></tr>
<tr><td>Moderate hazard area</td><td>Flood hazard – overland flow path
<u>Possible liquefaction-prone area</u>
<u>Fault avoidance area – lower recurrence interval faults (≥3500 years)</u></td></tr>
<tr><td>Low hazard area</td><td>Flood hazard – ponding
<s>Possible liquefaction-prone area</s></td></tr>
</table></td>
</tr>
<tr>
<td>Natural Hazards</td>
<td>Categorisation of Fault Hazard Areas</td>
<td>Amend</td>
<td>The categorisation of active fault hazard is not consistent with Ministry for the Environments’s 2003 guidance for development of land on or close to active faults.</td>
<td>Recategorize fault hazard zones as Fault Avoidance Zones, in line with the guidance for planning in fault zones, and include degrees of complexity in fault zones (e.g. well defines, distributed, and uncertain fault sections), and the</td>
</tr>
</table>

			The fault hazard areas in the proposed district plan maps include sections of differing widths, suggesting that the complexity of the fault rupture (e.g. well defines, distributed, and uncertain fault sections) is being taken into account in the mapping of the faults, but these categorisations should be provided in the text of the plan, along with the associated hazard risk. The MFE guidelines are available at: https://environment.govt.nz/publications/planning-for-development-of-land-on-or-close-to-active-faults-a-guideline-to-assist-resource-management-planners-in-new-zealand/	differing hazards associated with these categories, if this information is available.
Coastal Environment	**Foreshore Protection Area**	Amend	We support the use of a preliminary zone controlling building and development in areas which may be at risk from coastal hazards in the absence of adequate coastal hazard modelling. However, we consider that this layer should be more explicitly hazard related to avoid confusion as to the reason for the restriction. It is unclear from the Proposed Plan and the S32 report whether the Foreshore Protection Area is solely related to coastal hazard risk or controls for other matters. We suggest renaming the overlay to Coastal Hazards Area if it is solely related to coastal hazard risk, or to create a separate Coastal Hazard Area if not.	Rename Foreshore Protection Area to Coastal Hazards Area if the layer solely relates to risk from coastal hazards. If it relates to other matters, for example biodiversity or ecological concerns, create a new, separate Coastal Hazard overlay.

CCR-O3	**Resilience to natural hazards** The Wairarapa develops and functions in a way that does not increase risk and consequences of natural hazards.	Support	We support the objective of developing the Wairarapa in a way that does not increase the risk and consequences of natural hazards.	Retain as notified
NH-O1	**Risk from natural hazards** The risk and consequences from natural hazards on people, property, infrastructure, and the environment are not increased.	Amend	We support the objective of not increasing the risk and consequences from natural hazards on people, property, infrastructure and the environment, but we consider it appropriate to include encouraging reduction of risk from natural hazards.	Amend to: The risk and consequences from natural hazards on people, property, infrastructure, and the environment are <u>reduced or</u> not increased.
NH-P1	**Identification of natural hazards** Identify and map areas affected by natural hazards and take a risk-based approach to the management of subdivision, use, and development based on: 1. the sensitivity of the activities to the impacts of natural hazards; and 2. the hazard posed to people's lives and wellbeing, and property, by considering the likelihood and consequences of differing natural hazard events.	Support	We support accurate and up to date identification and mapping of natural hazards and a risk based approach to risk management of subdivision, use and development.	Retain as notified
NH-P2	**Activities in high hazard areas** Avoid locating hazard sensitive activities and potentially hazard sensitive activities within high hazard areas unless the activity has an operational need or functional need to locate within the high hazard area.	Support	We support avoiding hazard sensitive and potentially hazard sensitive activities within high hazard areas.	Retain as notified
NH-P3	**Activities in moderate hazard areas**	Support	We support avoiding hazard sensitive and potentially hazard sensitive activities within	Retain as notified

	Only allow hazard sensitive activities and potentially hazard sensitive activities within moderate hazard areas where: 1. the activity incorporates mitigation measures that demonstrate that risk to people's lives and wellbeing, and building damage is low, and any damage to buildings is minimised; 2. people can safely evacuate the property during a natural hazard event; and 3. the risk to adjacent properties, activities, and people is not increased as a result of the activity proceeding.		moderate hazard areas except where there is demonstrable evidence that natural hazard risk is minimised, evacuation routes are safeguarded, and the risk to adjacent properties and people is not increased.	
NH-P4	**Activities in low hazard areas** Provide for hazard sensitive activities and potentially hazard sensitive activities within low hazard areas where: 1. the activity incorporates mitigation measures that demonstrate that risk to people's lives and wellbeing, and building damage is low, and any damage to buildings is minimised, and 2. the risk to adjacent properties, activities, and people is not increased as a result of the activity proceeding.	Support	We support allowing for hazard sensitive and potentially hazard sensitive activities in low hazard areas, provided that there is demonstrable evidence that natural hazard risk is low, and the risk to adjacent properties and people is not increased.	Retain as notified
NH-P6	**Buildings in flood hazard - overland flow path and ponding areas** Discourage new buildings in flood hazard - overland flow path and ponding areas unless:	Amend	Unimpeded overland flow paths are important in allowing floodwater to escape and recede. Allowing a path for development within overland flow paths puts more people at risk from flood hazard	Amend to: Discourage new buildings in flood hazard - ~~overland flow path and~~ ponding areas unless:

	1. there is no increase in flood flow or level on adjoining sites; 2. risk to people's safety will be low; 3. the activity incorporates mitigation measures so that the risk of damage to buildings and structures is not significantly increased; and 4. people can safely evacuate the property during a natural hazard event		and may worsen the effects of flooding in the surrounding area. As such we consider it appropriate to avoid new buildings within overland flow paths unless there is a functional or operational need for them to be located there. We consider any increase of risk from flood hazard within flood alert areas as a result of new building and development to be unacceptable. Additionally, what constitutes a significant increase in risk is not defined and is open to interpretation.	1. there is no increase in flood flow or level on adjoining sites; 2. risk to people's safety will be low; 3. the activity incorporates mitigation measures so that the risk of damage to buildings and structures is not ~~significantly~~ increased; and 4. people can safely evacuate the property during a natural hazard event Avoid new buildings in flood hazard-overland flow path areas unless: 1. There is a functional or operational need for the building to be located there
NH-P7	**Buildings and structures in fault hazard areas** For new buildings and structures that contain habitable rooms and are located within fault hazard areas as shown on the District Planning maps: 1. Allow buildings and structures to locate within Fault Hazard Area where it can be demonstrated that the fault hazard risk can be avoided or mitigated to prevent loss of life. 2. Avoid buildings and structures locating within the Fault Hazard Area where the risk to life cannot be avoided or mitigated via distance from the fault, building engineering solutions, or other means.	Oppose	We oppose allowing a path for development of new buildings within fault hazard areas. MfE's 2003 guidance for development of land on or close to active faults specifies that 20m either side of a fault trace, including any areas of diffuse or distributed fault rupture zones is likely to be an area of intense deformation. We consider that habitable buildings should not be allowed within the Fault Hazard Areas. While life safety risk may be able to be minimised in certain types of building, the deformation and building damage within 20m of a fault rupture is not able to be mitigated by engineering solutions or means other than locating buildings outside of this zone.	Amend to: ~~For~~ Avoid new buildings and structures that contain habitable rooms and are located within fault hazard areas as shown on the District Planning maps: ~~1. Allow buildings and structures to locate within Fault Hazard Area where it can be demonstrated that the fault hazard risk can be avoided or mitigated to prevent loss of life.~~ ~~2. Avoid buildings and structures locating within the Fault Hazard Area where the risk to life cannot be avoided or mitigated via distance from the fault, building engineering solutions, or other means.~~

NH-P8	**Infrastructure in hazard areas** Allow for the upgrade of existing infrastructure, and only allow new infrastructure to be established in hazard areas where: 1. it has an operational need or functional need for the location; 2. it will be designed to maintain its integrity and function during and after a natural hazard event, or it will be able to be immediately re-instated after a natural hazard event, and 3. the risk to properties, activities, and people is not increased.	Support	We support allowing for hazard sensitive and potentially hazard sensitive activities in low hazard areas, provided that it has a functional or operational need for the location, is designed to retain functionality during and after a natural hazard event, and the risk to surrounding properties, activities and people is not increased.	Retain as notified
NH-P11	**Precautionary approach** Ensure a precautionary approach is taken in relation to planning for and adapting to the effects of natural hazards caused by climate change and sea level rise on both the natural environment and existing and future development.	Support	We support a precautionary approach to managing the risks from natural hazards, including those exacerbated by the effects of climate change.	Retain as notified
NH-P12	**Activities in flood alert areas** Only allow hazard sensitive activities and potentially hazard sensitive activities within flood alert areas where: 1. the activity incorporates mitigation measures that demonstrate that risk to people's lives and wellbeing, and	Support	We support avoiding locating hazard sensitive and potentially hazard sensitive activities within flood alert areas except where there is demonstrable evidence that natural hazard risk is minimised, evacuation routes are safeguarded, and the risk to adjacent properties and people is not increased.	Retain as notified

	building damage is low, and any damage to buildings is minimised; 2. people can safely evacuate the property during a natural hazard event; and 3. the risk to adjacent properties, activities, and people is not increased as a result of the activity proceeding			
NH-P13	**Buildings in flood alert areas** Discourage new buildings in flood alert areas unless: 1. there is no increase in flood flow or level on adjoining sites; 2. risk to people's safety will be low; 3. the activity incorporates mitigation measures so that the risk of damage to buildings and structures is not significantly increased; and 4. people can safely evacuate the property during a natural hazard event.	Amend	We consider any increase of risk from flood hazard within flood alert areas as a result of new building and development to be unacceptable. Additionally, what constitutes a significant increase in risk is not defined and is open to interpretation.	Amend to: Discourage new buildings in flood alert areas unless: 1. there is no increase in flood flow or level on adjoining sites; 2. risk to people's safety will be low; 3. the activity incorporates mitigation measures so that the risk of damage to buildings and structures is not ~~significantly~~ increased; and 4. people can safely evacuate the property during a natural hazard event.
NH-R3	**Any potentially hazard sensitive activity and associated buildings within moderate hazard areas and low hazard areas** Permitted where the activity or building is located within the possible liquefaction-prone area. Restricted discretionary where: a. Any building located in a flood hazard overlay has a finished floor level above the 1% AEP level; and	Amend	We consider that hazard sensitive activities should have at minimum restricted discretionary activity status within possible liquefaction prone areas. Liquefaction does not pose serious threat to life safety but can severely affect the structural integrity and liveability of properties, as was seen in the aftermath of the 2010 and 2011 Canterbury earthquake sequence. Liquefaction should therefore be considered a moderate hazard risk, and potentially hazard sensitive activities	**Any potentially hazard sensitive activity and associated buildings within moderate hazard areas and low hazard areas** ~~Permitted where the activity or building is located within the possible liquefaction-prone area.~~ Restricted discretionary where: a. Any building located in a flood hazard overlay has a finished floor level above the 1% AEP level; <u>or</u>

	b. The activity is located within a low to moderate fault hazard areas. Matters of discretion: 1. For activities in the moderate hazard area, the matters in Policy NH-P3. 2. For activities in the low hazard area, the matters in Policy NHP4. Discretionary where compliance is not achieved with NH-R3(2).		should have at minimum restricted discretionary status within these areas.	b. Any building is located withing the possible liquefaction prone area; and…
NH-R4	**Additions to buildings within all hazard areas** Permitted where: a. The building addition is located within the possible liquefaction prone area; or b. The additions do not increase the gross floor area of a hazard sensitive activity or potentially hazard sensitive activity by more than 20m²; and c. Any building additions located in the identified overland flowpath or ponding area of the flood hazard overlay have a finished floor level above the 1% AEP level. Restricted discretionary where: a. Compliance is not achieved with NH-R4(1). Matters of discretion: 1. For additions in the moderate hazard area, the matters in Policy NH-P3.	Amend	We consider that hazard sensitive activities should have at minimum restricted discretionary activity status within possible liquefaction prone areas. Liquefaction does not pose serious threat to life safety but can severely affect the structural integrity and liveability of properties, as was seen in the aftermath of the 2010 and 2011 Canterbury earthquake sequence. Liquefaction should therefore be considered a moderate hazard risk, and hazard sensitive or potentially hazard sensitive activities should have at minimum restricted discretionary status within these areas. Unimpeded overland flow paths are important in allowing floodwater to escape and recede. Allowing a path for development within overland flow paths puts more people at risk from flood hazard and may worsen the effects of flooding in the surrounding area. As such we consider	Amend to: **Additions to buildings within all hazard areas** Permitted where: ~~a. The building addition is located within the possible liquefaction prone area; or~~ b. The additions do not increase the gross floor area of a hazard sensitive activity or potentially hazard sensitive activity by more than 20m²; and c. Any building additions located in the identified ~~overland flowpath or~~ ponding area of the flood hazard overlay have a finished floor level above the 1% AEP level.

	2. For additions in the low hazard area, the matters in Policy NHP4. 3. For additions in the high hazard area, the matters in Policy NH-P2.		it appropriate to avoid new buildings within overland flow paths unless there is a functional or operational need for them to be located there.	
NH-R6	**New buildings and structures in Fault Hazard Area** Restricted discretionary where: a. Building or structure contains habitable room(s); and b. The subject site is located fully or partially within the Fault Hazard Area. Matters of discretion: 1. The proximity to any identified fault as demonstrated supporting geotechnical evidence; 2. Engineering measures incorporated into the building or structure to prevent loss of life from anticipated effects of a seismic event; and 3. The matters set out in NH-P1, NH-P8, and NH-P11.	Oppose	We oppose allowing a path for development of new buildings within fault hazard areas. MfE's 2003 guidance for development of land on or close to active faults specifies that 20m either side of a fault trace, including any areas of diffuse or distributed fault rupture zones is likely to be an area of intense deformation. We consider that habitable buildings should not be allowed within the Fault Hazard Areas. While life safety risk may be able to be minimised in certain types of building, the deformation and building damage within 20m of a fault rupture is not able to be mitigated by engineering solutions or means other than locating buildings outside of this zone. If a building is to be located within the Fault Hazard Area then a report by a suitably qualified professional should be provided to demonstrate that the building platform is at least 20m away from the fault.	Amend to: 1. Activity status~~: Restricted discretionary~~ Discretionary where: a. Building or structure contains habitable room(s); and b. The subject site is located fully or partially within the Fault Hazard Area; and c. A technical report by a suitably qualified professional is provided demonstrating that the building is at least 20m away from the identified fault trace. Activity status for a building with habitable rooms within the Fault Hazard area which cannot be demonstrated to be at least 20m away from the fault trace should be Non-Complying.
NH-R7	**Any new potentially hazard sensitive activity or hazard sensitive activity and associated buildings within flood alert areas** Restricted discretionary where:	Support	We support restricted discretionary activity status for hazard sensitive and potentially hazard sensitive activities within flood alert areas except where there is demonstrable evidence that natural hazard risk is	Retain as notified

	a. A supporting flood hazard assessment has been undertaken to determine the nature and scale of the flood hazard on the property; b. The risk of flooding to people and property is not increased; and c. The activity or building will not worsen the flood hazard. Matters of discretion: 1. For buildings, measures to avoid, remedy, or mitigate flooding effects on the building. 2. For buildings and activities in flood alert areas, the matters in Policy NH-P12 and NH-P13. Note: Determining the flood hazard level applicable to a property and appropriate mitigation measures shall be determined in consultation the relevant District Council, Greater Wellington Regional Council, and/or Wellington Water as required.		minimised, evacuation routes are safeguarded, and the risk to adjacent properties and people is not increased.	
NH-R8	**Infrastructure within hazard areas** Restricted discretionary where: a. Infrastructure is located within a low hazard area. Matters of discretion: 1. The matters set out in NH-P4, NH-P8, and NH-P11. Discretionary where: a. Infrastructure is located within moderate or high hazard areas.	Amend	We support restricted discretionary status for infrastructure within low hazard areas, noting that we consider liquefaction risk should be upgraded to moderate. We support discretionary status for infrastructure within moderate hazard areas	Retain as notified <u>if</u> liquefaction risk is upgraded to moderate status (see earlier submission point)

NH-R9	**Any hazard sensitive activity and associated buildings within moderate hazard areas and low hazard areas** Discretionary	Amend	We support discretionary status for hazard sensitive activities and buildings within moderate hazard areas and low hazard areas, noting that we consider liquefaction risk should be upgraded to moderate.	Retain as notified <u>if</u> liquefaction risk is upgraded to moderate status (see earlier submission point)
NH-R10	**Any hazard sensitive activity or potentially hazard sensitive activity and associated buildings within high hazard areas** Non complying	Support	We support non complying status for hazard sensitive activities and buildings within high hazard areas	Retain as notified
SUB-O1	**Subdivision and development design** Subdivision and developments create allotments and patterns of land use and development that: f. respond to the risks of natural hazards and is resilient to climate change.	Amend	We consider that the phrase "respond to risks" is not specific and can be open to interpretation.	Subdivision and developments create allotments and patterns of land use and development that: f.~~ respond to~~ <u>avoid or minimise where appropriate</u> the risks of natural hazards, and ~~is~~ <u>are</u> resilient to climate change.
SUB-P4	**Subdivision in areas with significant risks from natural hazards** Manage significant risks from natural hazards by avoiding subdivision that: a. creates new, increases the likelihood, or exacerbates existing natural hazards including coastal hazards, erosion, slippage, subsidence, falling debris, flooding, or liquefaction; b. results in adverse effects on the stability of land and buildings; c. accelerates, worsens, or results in material damage to land, buildings, or people from natural hazards; or	Amend	We support the management and restriction of subdivision within areas at risk from natural hazards. However, the term "significant" is not defined and will be open to interpretation.	Either remove the term "significant", or include a definition of the level of risk deemed significant by the District Council.

	d. at the time of subdivision does not provide safe and stable building platforms over a 100-year horizon taking into account potential effects from climate change and/or sea level rise.			
SUB-R6	**Subdivision of land within or partially within hazard areas** 1. Activity status Controlled where a building platform is located in a *low hazard area*. Matters of control: 1. The matters set out in Policies NH-P4, SUB-P1, and SUB-P2. 2. The effect of non-compliance with any relevant Subdivision or Overlay standard that is not met, and the matters of discretion of any standard that is not met. 3. Effects on the stability of land and *buildings,* and potential to create new or exacerbate existing *natural hazards* and the matters in SUB-P4. 2. Activity status Discretionary where a building platform is located in a moderate hazard area. 3. Activity status Non-complying where a building platform is located in a high hazard area.	Amend	We consider that controlled activity status is not restrictive enough for subdivision in low hazard areas, as this currently includes areas at risk from flood ponding and liquefaction hazards. Subdivision with the intent to provide for hazard sensitive or potentially hazard sensitive activities in ponding or liquefaction area should have restricted discretionary status at minimum. As noted earlier we consider that liquefaction should be classed as a moderate hazard. Liquefaction does not pose serious threat to life safety but can severely affect the structural integrity and liveability of properties, as was seen in the aftermath of the 2010 and 2011 Canterbury earthquake sequence. Liquefaction should therefore be considered a moderate hazard risk, and hazard sensitive or potentially hazard sensitive activities should have at minimum restricted discretionary status within these areas. While flood ponding does not pose a direct risk to life safety or building stability, the experience of flooding, particularly	Amend to: **Subdivision of land within or partially within hazard areas** 1. Activity status ~~Controlled~~ Restricted Discretionary where a building platform is located in a *low hazard area*. Matters of control: 1. The matters set out in Policies NH-P4, SUB-P1, and SUB-P2. 2. The effect of non-compliance with any relevant Subdivision or Overlay standard that is not met, and the matters of discretion of any standard that is not met. 3. Effects on the stability of land and *buildings,* and potential to create new or exacerbate existing *natural hazards* and the matters in SUB-P4. 2. Activity status Discretionary where a building platform is located in a moderate hazard area.

			repeated flood events, can be detrimental to the wellbeing, health, and financial stability of residents.	
SUB-R12	**Subdivision within the Coastal Environment** 1. Activity status Restricted discretionary where: a. A proposed *building* platform is identified for each proposed allotment that is capable of accommodating a *building* that complies with the permitted activity standards of the underlying zone; *b.* A building platform is not located in an area of *Outstanding Natural Character, Very High and High Natural Character,* or *Foreshore Protection Area*; and c. Any allotment created must have a minimum allotment size of 40ha. Matters of discretion: 1. The matters set out in Policies SUB-P1, SUB-P2, SUB-P6, SUB-P8, and the policies of the CE - Coastal Environment chapter… 6. Legal and physical access to and from lots.	Support	We support non-complying activity status for subdivision within the Foreshore Protection Area.	Retain as notified

	2. Activity status: Non-complying where Compliance is not achieved with SUB R12(1).			
CE-O3	**Risk from coastal hazards** The risk and consequences from coastal hazards including the impacts of sea level rise on people, property, infrastructure, and the environment are not increased.	Support with amendment	We support the objective of not increasing the risk and consequences from coastal hazards on people, property, infrastructure and the environment, but we consider it appropriate to include encouraging reduction of risk from natural hazards	Amend to: The risk and consequences from coastal hazards including the impacts of sea level rise on people, property, infrastructure, and the environment are reduced or not increased.
CE-P4	**Activities and subdivision within the coastal environment** Manage subdivision, use, and development within the coastal environment to ensure: x. ensuring that the location, design and scale of structures, buildings, and activities avoid or mitigate risks to people and property from coastal hazards and that the risk to other people, properties, and activities is not increased;	Support with amendments	We support the policy that activities and subdivision do not increase the risk and consequences from coastal hazards on people, property, infrastructure and the environment, but we consider it appropriate to include encouraging reduction of risk from natural hazards	Amend to: Manage subdivision, use, and development within the coastal environment to ensure: x. ensuring that the location, design and scale of structures, buildings, and activities avoid or mitigate risks to people and property from coastal hazards and that the risk to other people, properties, and activities is reduced or not increased.
CE-P5	**Residential activities within the coastal environment** Manage residential activities within the coastal environment by: c. take a precautionary approach to the risks from coastal hazards by avoiding new residential units within the Foreshore Protection Area due to the risks from coastal hazards	Support	We support taking a precautionary approach to the risks from coastal hazard , and avoidance of new residential units within the foreshore protection area.	Retain as notified
CE-P8	**Precautionary approach to coastal hazards**	Support with	We support a precautionary approach to new subdivision, use and development in areas which may be at risk from coastal	Rename Foreshore Protection Area to Coastal Hazards Area if the layer solely relates to risk from coastal hazards.

	Adopt a precautionary approach to new subdivision, use, and development where knowledge is lacking about coastal processes and where the risks from coastal hazards are likely to be high, by identifying the Foreshore Protection Area and: a. only providing for activities that have an operational need or functional need within the Foreshore Protection Area; b. avoid new residential activities and other hazard sensitive activities within the Foreshore Protection Area; and c. for activities within the Foreshore Protection Area that satisfy the above, manage effects to ensure any significant adverse effects on people and property will be avoided and all other effects will be avoided, and where this is not practicable, will be mitigated.	amendments	hazards, but where there is inadequate knowledge or modelling of coastal hazard processes. However, we consider that the Foreshore Protection Area should be more explicitly hazard related to avoid confusion as to the reason for the restriction. It is unclear from the Proposed Plan and the S32 report whether the Foreshore Protection Area is solely related to coastal hazard risk or controls for other matters. We suggest renaming the overlay to Coastal Hazards Area if the Foreshore Protection Area is solely related to coastal hazard risk, or to create a separate Coastal Hazard Area if not.	If it relates to other matters, for example biodiversity or ecological concerns, create a new, separate Coastal Hazard overlay.