


EQC late TTPP submission

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 EQC submission on TTPP nov 2022.xlsx  
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Kia ora Koutou,

I am writing to send you Toka Tū Ake EQC's further submission on Te Tai o Poutini Plan, on behalf of Jo Horrocks, Chief Resilience & Research Officer.

Sincere apologies for the lateness of this submission. I understand if it is too late for you to accept, but I thought it best to send you our thoughts despite the missed deadline. The West Coast has significant natural hazard risk and Toka Tū Ake has an interest in improving the resilience of the West Coast and all of Aotearoa to natural hazards and the increasing effects of climate change.

Please do not hesitate to contact us regarding this submission, but please direct all emails to [resilience@eqc.govt.nz](mailto:resilience@eqc.govt.nz).

Ngā mihi,

**Tabitha Bushell**  
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[EQC's Resilience Strategy for Natural Hazard Risk Reduction](#)  
[EQC Resilience and Research Programme](#)



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**Instructions:** This spreadsheet template has been made available to assist submitters wishing to make submissions on a significant number of provisions in the Proposed Plan.

If you are using this spreadsheet, please also complete a submission form with the details of the submitter. This can be done by either:

1. downloading and completing a submission form from the Council's website and lodging the form and this spreadsheet via email to info@tppp.nz; or
2. using the online submission tool accessible from the Council's website to upload this document as a supporting document. If you choose this method, please add one submission point to your online submission and select [General] as the Plan Section and [General] as the Provision.

To add your submission points to this spreadsheet, please scroll to the relevant Plan Section and click the '+' symbol to expand the group to show all of the provisions within that section. In the row containing the provision you wish to submit on, select one of the options from the Support/oppose column (click in the relevant cell and an arrow button will appear that presents a dropdown list). Add the reasons and the decision you seek in the next two columns. Please ensure you add both reasons and decision sought as these are an important part of your submission. If you are asking for a new provision to be added to a section, please include that in the row for the first provision in that section (the spreadsheet does not allow new rows to be added). Similarly, if you wish to make a submission that relates to a whole section of the Plan, please include that in row for the first provision in that section.

If you require any assistance with using this spreadsheet, please contact the District Plan team at info@tppp.nz.

Plan section	Provision	Support Oppose	Reasons	Decision sought
<b>[General]</b>				
<b>Whole Plan</b>				
Whole Plan	Whole plan			
<b>Introduction Section</b>				
<b>How The Plan Works Section</b>				
<b>Interpretation Section</b>				
<b>Glossary Section</b>				
<b>Abbreviations Section</b>				
<b>National Direction Instruments Section</b>				
<b>Tangata Whenua Section</b>				
<b>PART 2 - DISTRICT WIDE MATTERS Section</b>				
<b>Strategic Direction Section</b>				
Strategic Direction	STRATEGIC DIRECTION			
Strategic Direction	Strategic Directions Overview			
Strategic Direction	AG			
Strategic Direction	Agriculture			
Strategic Direction	Agriculture Strategic Objectives			
Strategic Direction	AG - O1			
Strategic Direction	AG - O2			
Strategic Direction	CR			
Strategic Direction	Connections and Resilience			
Strategic Direction	Connections and Resilience Strategic Objectives			
Strategic Direction	CR - O1	Support	We support building resilience in the recognition that adaptation to climate change is essential for the long-term sustainability of the West Coast.	No Change
Strategic Direction	CR - O2	Support	We support building resilience in west coast communities and we support effective emergency management systems.	No Change
Strategic Direction	CR - O3	Support	We support the development of critical infrastructure away from natural hazards.	No Change
Strategic Direction	CR - O4	Support	We support the development of self-sufficient critical infrastructure which is resilient to natural hazards.	No Change
Strategic Direction	MIN			
Strategic Direction	Mineral Extraction			
Strategic Direction	MIN - O1			
Strategic Direction	MIN - O2			
Strategic Direction	MIN - O3			
Strategic Direction	MIN - O4			
Strategic Direction	MIN - O5			
Strategic Direction	MIN - O6			
Strategic Direction	NENV			

Strategic Direction	Natural Environment		
Strategic Direction	Natural Environment Strategic Objectives		
Strategic Direction	NENV- O1		
Strategic Direction	NENV- O2		
Strategic Direction	NENV - O3		
Strategic Direction	NENV - O4		
Strategic Direction	POU		
Strategic Direction	Poutini Ngāi Tahu		
Strategic Direction	Poutini Ngāi Tahu Strategic Objectives		
Strategic Direction	POU - O1		
Strategic Direction	POU - O2		
Strategic Direction	POU - O3		
Strategic Direction	POU - O4		
Strategic Direction	Poutini Ngāi Tahu Strategic Policies		
Strategic Direction	POU - P1		
Strategic Direction	POU - P2		
Strategic Direction	POU - P3		
Strategic Direction	POU - P4		
Strategic Direction	POU - P5		
Strategic Direction	POU - P6		
Strategic Direction	POU - P7		
Strategic Direction	POU - P8		
Strategic Direction	POU - P9		
Strategic Direction	POU - P10		
Strategic Direction	TRM		
Strategic Direction	Tourism		
Strategic Direction	Tourism Strategic Objective		
Strategic Direction	TRM - O1	Amend	The West Coast region has a high number of visitors each year and tourism is Add: "9. Recognise the risk of natural hazards whereby new developments are
Strategic Direction	UFD		
Strategic Direction	Urban form and development		
Strategic Direction	Urban Form and Development Strategic Objective		
Strategic Direction	UFD - O1	Support in part	We support the strategic objective to situate new developments in less hazard Add "and intensification", and, "and to avoid intensification in higher hazard a

**Energy Infrastructure and Transport Section**

**Energy Section**

Energy	ENG		
Energy	Energy		
Energy	Overview		
Energy	Other relevant Te Tai o Poutini Plan provisions		
Energy	Energy Objectives		
Energy	ENG - O1		
Energy	ENG - O2		
Energy	ENG - O3		
Energy	ENG - O4		
Energy	Energy Policies		
Energy	ENG - P1		
			We support the buiding of communityresilience and reduction of greenhouse gas emissions by "a. Maintaining or increasing security of renewable electricity supply by diversifying the type and/or location of electricity generation; b. Maintaining or increasing renewable electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions;" "f. Facilitation and use of renewable energy;"and "h. Meeting New Zealand/Aotearoa me Te Waipounamu's climate change obligations."
Energy	ENG - P2	Support in part	No change
Energy	ENG - P3		
Energy	ENG - P4		
Energy	ENG - P5		
Energy	ENG - P6		
Energy	ENG - P7		

Energy	ENG - P8
Energy	ENG - P9
Energy	Energy Rules
Energy	Permitted Activities
Energy	ENG - R1
Energy	ENG - R2
Energy	ENG - R3
Energy	ENG - R4
Energy	ENG - R5
Energy	ENG - R6
Energy	ENG - R7
Energy	ENG - R8
Energy	ENG - R9
Energy	ENG - R10
Energy	Restricted Discretionary Activities
Energy	ENG - R11
Energy	ENG - R12
Energy	ENG - R13
Energy	ENG - R14
Energy	Discretionary Activities
Energy	ENG - R15
Energy	ENG - R16
Energy	Non-complying Activities
Energy	ENG - R17
Energy	ENG - R18
Energy	ENG - R19
Energy	ENG - R20

**Infrastructure Section**

Infrastructure	INF
Infrastructure	Infrastructure
Infrastructure	Overview
Infrastructure	Other relevant Te Tai o Poutini Plan provisions
Infrastructure	Infrastructure Objectives
Infrastructure	INF - O1
Infrastructure	INF - O2
Infrastructure	INF - O3
Infrastructure	INF - O4
Infrastructure	INF - O5
Infrastructure	Infrastructure Policies
Infrastructure	INF - P1
Infrastructure	INF - P2
Infrastructure	INF - P3

Infrastructure	INF - P4	Support	We support considering natural hazard mitigation and the effects of climate change	No change
Infrastructure	INF - P5	Support	We support the management of infrastructure and utilities in a way which considers the effects of climate change	No change
Infrastructure	INF - P6	Support	We support the treatment and safe disposal of stormwater that does not result in increased flooding and erosion risk, and connection to the stormwater system where available.	No change
Infrastructure	Infrastructure Rules	Support	We support the development of infrastructure which minimises stormwater impacts	No change
Infrastructure	Permitted Activities			
Infrastructure	INF - R1			
Infrastructure	INF - R2			
Infrastructure	INF - R3			
Infrastructure	INF - R4			
Infrastructure	INF - R5			
Infrastructure	INF - R6			
Infrastructure	INF - R7			
Infrastructure	INF - R8			
Infrastructure	INF - R9			
Infrastructure	INF - R10			
Infrastructure	INF - R11			

Infrastructure	INF - R12		
Infrastructure	Controlled Activities		
Infrastructure	INF - R13		
Infrastructure	INF - R14		
Infrastructure	INF - R15		
Infrastructure	Restricted Discretionary Activities		
Infrastructure	INF - R16	Support	We support the councils' consideration of flood hazard management in matters of No change
Infrastructure	INF - R17		
Infrastructure	INF - R18		
Infrastructure	INF - R19	Support	We support the councils' consideration of resilience to natural hazards and climate No change
Infrastructure	INF - R20		
Infrastructure	INF - R21	Support	We support the councils' consideration of natural hazards in matters of discretionary No change
Infrastructure	INF - R22		
Infrastructure	INF - R23		
Infrastructure	Discretionary Activities		
Infrastructure	INF - R24		
Infrastructure	INF - R25		
Infrastructure	INF - R26		
Infrastructure	INF - R27		
Infrastructure	Non-complying Activities		
Infrastructure	INF - R28		

**Transport Section**

Transport	TRN		
Transport	Transport		
Transport	Overview		
Transport	Other relevant Te Tai o Poutini Plan provisions		
Transport	Transport Objectives		
Transport	TRN - O1		
Transport	TRN - O2		
Transport	TRN - O3		
Transport	TRN - O4	Support	We support resilience to natural hazards and climate change in the transport No change
Transport	TRN - O5		
Transport	Transport Policies		
Transport	TRN - P1		
Transport	TRN - P2		
Transport	TRN - P3		
Transport	TRN - P4		
Transport	TRN - P5		
Transport	TRN - P6		
Transport	TRN - P7		
Transport	TRN - P8		
Transport	TRN - P9		
Transport	Transport Rules		
Transport	Advice Notes:		
Transport	Permitted Activities		
Transport	TRN - R1		
Transport	TRN - R2		
Transport	TRN - R3		
Transport	TRN - R4		
Transport	TRN - R5		
Transport	TRN - R6		
Transport	Restricted Discretionary Activities		
Transport	TRN - R7	Support	We support the councils' consideration of flood hazard mitigation in matters of No Change
Transport	TRN - R8	Support	We support the councils' consideration of flood hazard mitigation in matters of No Change
Transport	TRN - R9	Support	We support the councils' consideration of flood hazard mitigation in matters of No Change
Transport	TRN - R10		
Transport	TRN - R11		
Transport	TRN - R12		
Transport	Discretionary Activities		
Transport	TRN - R13		

Transport	TRN - R14		
<b>HAZ - Hazards and Risks Section</b>			
HAZ - Hazards and Risks	HAZ - Hazards and Risks		
<b>Contaminated Land Section</b>			
<b>Hazardous Substances Section</b>			
Hazardous Substances	HS		
Hazardous Substances	Hazardous Substances		
Hazardous Substances	Overview		
Hazardous Substances	Hazardous Substances Objectives		
Hazardous Substances	HS - O1		
Hazardous Substances	Hazardous Substances Policies		
Hazardous Substances	HS - P1		
Hazardous Substances	HS - P2	Amend	We support the location of major hazard facilities away from areas subject to Include hazardous facilities within the policy, and define what constitutes a significant
Hazardous Substances	HS - P3		
Hazardous Substances	HS - P4		
Hazardous Substances	NH		
Hazardous Substances	Natural Hazards	Amend	The West Coast region has a number of active onshore and offshore faults around Wellington. Add all active faults in the region to planning maps, including exclusion zones
Hazardous Substances	Natural Hazards Objectives		
Hazardous Substances	NH - O1	Support	We support a regionally consistent, risk-based approach to natural hazard management. No Change
Hazardous Substances	NH - O2	Support	We support the reduction of risk from natural hazards and promoting community resilience. No Change
Hazardous Substances	NH - O3	Support in part	To avoid inconsistent interpretation of the objective it is important to define what constitutes a significant natural hazard. Define what constitutes a significant natural hazard
Hazardous Substances	NH - O4	Support	We support the protection of natural features which reduce the impact of natural hazards. No Change
Hazardous Substances	NH - O5	Support	It is important to factor in the current and future impacts of climate change on natural hazards. No Change
Hazardous Substances	NH - O6	Support	It is important to ensure that natural hazard risk reduction measures do not increase other risks. No Change
Hazardous Substances	Policies		
Hazardous Substances	NH - P1	Support in part	To avoid inconsistent interpretation of the policy it is important to define what constitutes a significant natural hazard. Define what constitutes a significant natural hazard
Hazardous Substances	NH - P2	Support in part	To avoid inconsistent interpretation of the policy it is important to define what constitutes a significant natural hazard. Define what constitutes a significant natural hazard
Hazardous Substances	NH - P3		
Hazardous Substances	NH - P4	Support	We support the consideration of climate change and changing environmental conditions. No change
Hazardous Substances	NH - P5	Support	We support the consideration of managed retreat in minimising the risk posed by natural hazards. No Change
Hazardous Substances	NH - P6	Support in part	The current mapping of exclusion zones around the Alpine Fault does not include some areas. We support this policy in principle, but only if avoidance zones around faults are clearly defined.
Hazardous Substances	NH - P7	Support	We consider it appropriate for unoccupied structures to be built in the Earthquake Prone Areas. No Change
Hazardous Substances	NH - P8	Support	We support the avoidance of critical response, health, community, education and other sensitive activities. No Change
Hazardous Substances	NH - P9	Support	We support restricting development of sensitive activities within areas at risk of natural hazards. No Change
Hazardous Substances	NH - P10	Support	We support restricting development of sensitive activities within areas at risk of natural hazards. No Change
Hazardous Substances	NH - P11	Support	We support restricting development of sensitive activities within areas at risk of natural hazards. No Change
Hazardous Substances	NH - P12	Support	We support the thorough consideration of all aspects and impacts of natural hazards. No Change
Hazardous Substances	NH - P13	Oppose in part	We support requiring flood mitigation, including for sea level rise, for development within the Westport Hazard Overlay. Further limit subdivision, use, and development within the Westport Hazard Overlay.
Hazardous Substances	NH - P14	Oppose in part	We support requiring flood mitigation, including for sea level rise, for development within the Hokitika Coastal Hazard Overlay. Further limit subdivision, use, and development within the Hokitika Coastal Hazard Overlay.
Hazardous Substances	Advice Notes:		
Hazardous Substances	Rules - All Natural Hazard Overlays		
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH- R1	Oppose	Buildings should not be rebuilt within the flood susceptibility hazard overlay. Amend NH-R1 to prohibit reconstruction of buildings used for sensitive activities.
Hazardous Substances	NH - R2		
Hazardous Substances	NH- R3		
Hazardous Substances	NH - R4		
Hazardous Substances	Discretionary Activities		
Hazardous Substances	NH - R5		
Hazardous Substances	Rules - Flood Severe Overlay and Flood Susceptibility Overlay	Support in part	We support the categorisation of flood hazard into two overlays, with the Flood Severe Overlay covering areas of high risk. Include further explanation of what Flood Severe and Flood Susceptibility overlays cover.
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R6		
Hazardous Substances	NH - R7		
Hazardous Substances	NH - R8	Oppose in part	We support the requirement of a finished floor level 300mm above the 1% AEP flood level. New commercial and industrial buildings and additions and alterations to existing buildings should be sited to meet this requirement.
Hazardous Substances	NH - R9		
Hazardous Substances	NH - R10	Support in part	We support the requirement of a finished floor level of 500mm above the 1% AEP flood level. No Change
Hazardous Substances	Restricted Discretionary Activities		
Hazardous Substances	NH - R11	Oppose in part	We consider that critical response facilities should only be situated within areas of low risk. No Change
Hazardous Substances	NH - R12	Oppose in part	We support restricting new commercial and industrial buildings within the flood severe overlay. New commercial and industrial buildings within the flood severe overlay should be sited to meet the requirement.
Hazardous Substances	Discretionary Activities		

Hazardous Substances	NH - R13		
Hazardous Substances	Non-complying Activities		
Hazardous Substances	NH - R14	Support	We support the avoidance of sensitive activities within the flood severe overl No change
Hazardous Substances	Rules - Earthquake Hazard Overlays - All		
Hazardous Substances	Permitted Activities - All Earthquake Hazard Overlays	Amend	The TTPP maps and associated section 32 report describe the exclusion zone Incorporate uncertainty and distributed fault deformation into earthquake ha
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R15		
Hazardous Substances	Non-complying Activities		
Hazardous Substances	NH - R16	Support	We support the avoidance of sensitive activities within the earthquake hazar No change
Hazardous Substances	Prohibited Activities		
Hazardous Substances	NH - R17	Support	We support the avoidance of sensitive activities within the earthquake hazar No change
Hazardous Substances	Rules - Earthquake Hazard Overlay - 20m		
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R18	Amend	Occupied buildings' is not defined, and it is not clear if these buildings are the Define 'occupied building'
Hazardous Substances	Non-complying Activities		
Hazardous Substances	NH - R19	Amend	Occupied buildings' is not defined, and it is not clear if these buildings are the Define 'occupied building'
Hazardous Substances	Rules - Earthquake Hazard Overlay - 50m		
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R20	Amend	Occupied buildings' is not defined, and it is not clear if these buildings are the Define 'occupied building'
Hazardous Substances	Restricted Discretionary Activities		
Hazardous Substances	NH - R21	Support in part	While we support NH-R21 in principle, we consider that the current Earthqua Amendment of the Earthquake Hazard Zone to incorporate uncertainty and d
Hazardous Substances	Discretionary Activities		
Hazardous Substances	NH - R22	Support in part	While we support NH-R22 in principle, we consider that the current Earthqu Amendment of the Earthquake Hazard Zone to incorporate uncertainty and d
Hazardous Substances	Non-complying Activities		
Hazardous Substances	NH - R23	Support	We support the avoidance of community, education, and health facilities witl No change
Hazardous Substances	Rules - Earthquake Hazard Overlay - 100m		
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R24	Amend	Occupied buildings' is not defined, and it is not clear if these buildings are the Define 'occupied building'
Hazardous Substances	Restricted Discretionary Activities		
Hazardous Substances	NH - R25	Amend	While we support NH-R25 in principle, we consider that the current Earthqua Amendment of the Earthquake Hazard Zone to incorporate uncertainty and d
Hazardous Substances	Discretionary Activities		
Hazardous Substances	NH - R26	Amend	While we support NH-R26 in principle, As discussed previously we consider th Amendment of the Earthquake Hazard Zone to incorporate uncertainty and d
Hazardous Substances	Rules - Earthquake Hazard Overlay - 150m		
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R27	Amend	Occupied buildings' is not defined, and it is not clear if these buildings are the Define 'occupied building'
Hazardous Substances	Restricted Discretionary Activities		
Hazardous Substances	NH - R28	Amend	While we support NH-R28 in principle, we consider that the current Earthqua Amendment of the Earthquake Hazard Zone to incorporate uncertainty and d
Hazardous Substances	Discretionary Activities		
Hazardous Substances	NH - R29	Amend	While we support NH-R29 in principle, we consider that the current Earthqua Amendment of the Earthquake Hazard Zone to incorporate uncertainty and d
Hazardous Substances	Rules - Earthquake Hazard Overlay - 200m		
Hazardous Substances	NH - R30	Amend	Occupied buildings' is not defined, and it is not clear if these buildings are the Define 'occupied building'
Hazardous Substances	Restricted Discretionary Activities		
Hazardous Substances	NH - R31	Amend	While we support NH-R31 in principle, we consider that the current Earthqua Amendment of the Earthquake Hazard Zone to incorporate uncertainty and d
Hazardous Substances	Discretionary Activities		
Hazardous Substances	NH - R32	Amend	While we support NH-R32 in principle, we consider that the current Earthqua Amendment of the Earthquake Hazard Zone to incorporate uncertainty and d
Hazardous Substances	Rules - Land Instability Overlay		
Hazardous Substances	Restricted Discretionary Activities		
Hazardous Substances	NH - R33	Support	We support the restriction of development in areas at risk from land instabili No Change
Hazardous Substances	Non-complying Activities		
Hazardous Substances	NH - R34	Support	We support the restriction of development in areas at risk from land instabili No Change
Hazardous Substances	Rules - Lake Tsunami Hazard Overlay		
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R35		
Hazardous Substances	Restricted Discretionary Activities		
Hazardous Substances	NH - R36	Support	We support the restriction of development in areas at risk from lake tsunami No Change
Hazardous Substances	Non-complying Activities		
Hazardous Substances	NH - R37	Support	We support the restriction of development in areas at risk from lake tsunami No Change
Hazardous Substances	Rules for the Coastal Severe and Coastal Alert Overlays		
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R38	Oppose in part	As with NH-R1, reconstruction of buildings within hazard overlays should be : Avoid reconstruction of buildings used for sensitive activities within the Coast
Hazardous Substances	NH - R39		



Hazardous Substances	NH - R40		If industrial buildings are permitted in the coastal severe overlay, alert systems and evacuation planning should be mandated. Critical Response Facilities sh
Hazardous Substances	NH - R41		
Hazardous Substances	Restricted Discretionary Activities		
Hazardous Substances	NH - R42	Support	We support the restriction of development in areas at risk from coastal hazard No Change
Hazardous Substances	Discretionary Activities		
Hazardous Substances	NH - R43	Support	We support the restriction of development in areas at risk from coastal hazard No Change
Hazardous Substances	Non-complying Activities		
Hazardous Substances	NH - R44	Support	We support the restriction of development in areas at risk from coastal hazard No Change
Hazardous Substances	Coastal Setback Overlay		
Hazardous Substances	Restricted Discretionary Activities		
Hazardous Substances	NH - R45	Support	We support the restriction of development in areas at risk from coastal hazard No Change
Hazardous Substances	Non-complying Activities		
Hazardous Substances	NH - R46	Support	We support the restriction of development in areas at risk from coastal hazard No Change
Hazardous Substances	Coastal Tsunami Overlay		
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R47	Support	We support the restriction of development in areas at risk from tsunami No Change
Hazardous Substances	Discretionary Activities		
Hazardous Substances	NH - R48	Support	We support the restriction of development in areas at risk from tsunami.It w No Change
Hazardous Substances	Non-complying Activities		
Hazardous Substances	NH - R49	Support	We support the restriction of development in areas at risk from tsunami No Change
Hazardous Substances	Hokitika Coastal Overlay	Amend	Terminology for the Hokitika Coastal Overlay differs from that of the rest of t Use consistent terminology to describe flood hazards and coastal inundation ;
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R50	Amend	Residual risk exists for buildings within the Hokitika Flood and Coastal Erosion Also require minimum finished floor levels 500mm above the 100-year ARI co
Hazardous Substances	Discretionary Activities		
Hazardous Substances	NH - R51	Support	We support the restriction of development in areas at risk from coastal hazard No Change
Hazardous Substances	Westport Hazard Overlay	Oppose in part	Terminology for the Westport Hazard Overlay differs from that of the rest of Use consistent terminology to describe flood hazards across all areas of the M
Hazardous Substances	Permitted Activities		
Hazardous Substances	NH - R52	Oppose in part	Residual risk exists for buildings within the Westport Flood and Coastal Erosion Require minimum finished floor levels 500mm above the 100-year ARI coasta
Hazardous Substances	Discretionary Activities		
Hazardous Substances	NH - R53	Support	We support the restriction of development in areas at risk from coastal hazard No Change

**HCV - Historical and Cultural Values Section**

**Historic Heritage Section**

**Notable Trees Section**

**Sites and Areas of Significance to Māori Section**

**Natural Environment Values Section**

**Ecosystems and Indigenous Biodiversity Section**

**Natural Features and Landscapes Section**

**Public Access Section**

**Natural Character and Margins of Waterbodies Section**

**Financial Contributions Section**

**Subdivision Section**

Subdivision	SUB		
Subdivision	Subdivision		
Subdivision	Overview		
Subdivision	Subdivision Objectives		
Subdivision	SUB - O1		
Subdivision	SUB - O2	Amend	We support the objective of subdivision which avoids areas at risk from natural hazard Define what constitutes a 'significant' natural hazard
Subdivision	SUB - O3		
Subdivision	SUB - O4		
Subdivision			We support the use of esplanade reserves and strips created through subdivision in contributing to providing natural hazard mitigation
Subdivision	SUB - O5	support	
Subdivision	SUB - O6		
Subdivision	Subdivision Policies		



Subdivision	SUB - P1	Support	We support subdivision which minimises the risk from natural hazards to live No Change
Subdivision	SUB - P2	Support	we support the requirement that infratructure ensures treatment and safe disposal c No Change
Subdivision	SUB - P3		
Subdivision	SUB - P4	Amend	We consider that the instances described in SUB-P4 pose a level of risk to life Change "Manage significant risks from natural hazards by <i>restricting</i> subdivisi
Subdivision	SUB - P5		
Subdivision	SUB - P6	Support	We support avoiding subdivision which creates new allotments within the Ea No Change to Sub P6, but change to overlay
Subdivision	SUB - P7		
Subdivision	SUB - P8		
Subdivision	SUB - P9	Support	We support the widening of the esplanade strip where appropriate to provide extra protection from natural hazards
Subdivision	Subdivision Rules		
Subdivision	Note:	Support in part	We support the inclusion of natural hazards in matters of control for restricte No Change
Subdivision	Permitted Activities		
Subdivision	SUB - R1		
Subdivision	SUB - R2		
Subdivision	Controlled Activities		
Subdivision	SUB - R3	Support	We support Natural Hazards being included in matters of control
Subdivision	SUB - R4	Support	We support Natural Hazards being included in matters of control We support exclusion of areas within the Earthquake hazard overlay and ares of Flood Severe, Coastal Severe or Westport Hazard Overlay and the inclusion of Natural hazards or geotechnical constraints as matters of control
Subdivision	SUB - R5		We support exclusion of areas within the Earthquake hazard overlay and ares of Flood Severe, Coastal Severe or Westport Hazard Overlay, Any Flood Susceptibility, Flood Plain, Land Instability, Coastal Alert or Coastal Tsunami Hazard Overlay; but suggest the inclusion of Natural hazards or geotechnical constraints as matters of control suggest the inclusion of Natural hazards or geotechnical constraints as matter
Subdivision	SUB - R6	Amend	
Subdivision	SUB - R7/ECO - R4		We support exclusion of areas within the Earthquake hazard overlay and ares of Flood Severe, Coastal Severe or Westport Hazard Overlay, Any Flood Susceptibility, Flood Plain, Land Instability, Coastal Alert or Coastal Tsunami Hazard Overlay; but suggest the inclusion of Natural hazards or geotechnical constraints as matters of control suggest the inclusion of Natural hazards or geotechnical constraints as matter
Subdivision	SUB - R8	Amend	
Subdivision	Restricted Discretionary Activities		
Subdivision	SUB - R9/ECO - R6		
Subdivision	SUB - R10		
Subdivision	SUB - R11		
Subdivision	SUB - R12	Amend	It is essential that future growth adequately considers exposure to natural ha Include natural hazards and geotechnical consriants in matters of discretion
Subdivision	SUB - R13	Support in part	We support discretionary status for subdivision to create allotments in natur: change "The subdivision will not lead to use of the land within the Coastal Tsu
Subdivision	Discretionary Activities		
Subdivision	SUB - R14		
Subdivision	SUB - R15/ECO - R8		
Subdivision	SUB - R16		
Subdivision	SUB - R17		
Subdivision	SUB - R18		
Subdivision	SUB - R19		
Subdivision	SUB - R20	Support	We support discretionary status for subdivision to create allotments in the W No Change
Subdivision	SUB - R21	Support	We support discretionary status for subdivision to create allotments in the C No Change
Subdivision	SUB - R22		
Subdivision	SUB - R23		
Subdivision	Non-complying Activities		
Subdivision	SUB - R24		
Subdivision	SUB - R25		
Subdivision	SUB - R26	Support	We support Non-complying status for subdivision to create allotments in the No Change
Subdivision	SUB - R27/ECO - R9		
Subdivision	Prohibited Activities		
Subdivision	SUB - R28	Support	We support prohibited status for subdivision to create allotments in the 20m No Change
Subdivision	Subdivision Standards		
Subdivision	SUB - S1		
Subdivision	SUB - S2	Support	We support the requirement that indicative building platforms be outside of No Change

Subdivision	SUB - S3
Subdivision	SUB - S4
Subdivision	SUB - S5
Subdivision	SUB - S6
Subdivision	SUB - S7
Subdivision	SUB - S8
Subdivision	SUB - S9
Subdivision	SUB - S10
Subdivision	SUB - S11

**General District Wide Matters Section**

**Activities on the surface of water Section**

**Coastal Environment Section**

**Earthworks Section**

**Light Section**

**Noise Section**

**Signs Section**

**Temporary Activities Section**

**PART 3 - AREA-SPECIFIC MATTERS Section**

**ZONES Section**

**Open Space and Recreation Zones Section**

**Natural Open Space Zone Section**

**Open Space Zone Section**

**Sport and Active Recreation Zone Section**

**Commercial and Mixed Use Zones Section**

**Commercial Zone Section**

**Mixed Use Zone Section**

**Neighbourhood Centre Zone Section**

**Town Centre Zone Section**

**Industrial Zones Section**

**General Industrial Zone Section**

**Light Industrial Zone Rules Section**

**Residential Zones Section**

**General Residential Zone Section**

**Large Lot Residential Zone Section**

**Medium Density Residential Zone Section**

**Rural Zones Section**

**General Rural Zone Section**

**Rural Lifestyle Zone Section**

**Settlement Zone Section**

**SPZ - Special Purpose Zones Section**

**Airport Zone Section**

Support  
amend

We support "Where the means of stormwater disposal is to ground, that area shall not be subject to instability, slippage or inundation, or used for the disposal of effluent. Suggest add requirement that effluent disposal does not cause land instability. All allotments must provide the means for disposal of wastewater from all plots."

**Buller Coalfield Zone Section**

**Future Urban Zone Section**

Future Urban Zone	FUZ
Future Urban Zone	Future Urban Zone
Future Urban Zone	Overview
Future Urban Zone	Future Urban Zone Objectives
Future Urban Zone	FUZ -O1
Future Urban Zone	FUZ -O2
Future Urban Zone	FUZ -O3
Future Urban Zone	FUZ -O4
Future Urban Zone	Future Urban Zone Policies
Future Urban Zone	FUZ - P1
Future Urban Zone	FUZ - P2
Future Urban Zone	FUZ - P3
Future Urban Zone	FUZ - P4
Future Urban Zone	FUZ - P5
Future Urban Zone	Future Urban Zone Rules
Future Urban Zone	Note:
Future Urban Zone	FUZ - R1
Future Urban Zone	FUZ - R2
Future Urban Zone	FUZ - R3
Future Urban Zone	FUZ - R4
Future Urban Zone	FUZ - R5
Future Urban Zone	FUZ - R6
Future Urban Zone	FUZ - R7
Future Urban Zone	FUZ - R8
Future Urban Zone	FUZ - R9
Future Urban Zone	FUZ - R10
Future Urban Zone	Controlled Activities
Future Urban Zone	FUZ - R11
Future Urban Zone	FUZ - R12
Future Urban Zone	Restricted Discretionary Activities
Future Urban Zone	FUZ - R13
Future Urban Zone	FUZ - R14
Future Urban Zone	FUZ - R15
Future Urban Zone	FUZ - R16
Future Urban Zone	FUZ - R17
Future Urban Zone	Discretionary Activities
Future Urban Zone	FUZ - R18
Future Urban Zone	FUZ - R19
Future Urban Zone	Non Complying Activities
Future Urban Zone	FUZ - R20
Future Urban Zone	FUZ - R21
Future Urban Zone	FUZ - R22
Future Urban Zone	FUZ - R23
Future Urban Zone	FUZ - R24

Support in part We see that land identified for future urban development is subject to land i We would like to question whether there is a possiblity of moving future urb:  
 Support We support the identification and management of land for future urban development to ensure it is fit for purpose when the time for development come:

Support We support future urban land being made available for managed retreat.

Support in part We support urbanisationon of FUZ sites in a planned manner that accounts a "Urbanisation on sites zoned FUZ - Future Urban Zone occurs in a planned ma

**Hospital Zone Section**

**Mineral Extraction Zone Section**

**Māori Purpose Zone Section**

**Port Zone Section**

**Stadium Zone Section**

**Scenic Visitor Zone Section**

**Development Areas Section**

**Designations Section**

**PART 4 - APPENDICES Section**

**Schedules Section**

**SCHED1A - SCHEDULE OF HISTORIC HERITAGE ITEMS AND AREAS Section**

**SCHED1B - SCHEDULE OF ARCHEOLOGICAL SITES Section**

**SCHED2 - SCHEDULE OF NOTABLE TREES Section**

**SCHED3 - SITES AND AREAS OF SIGNIFICANCE TO MĀORI Section**

**SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS Section**

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - W033

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - W034

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 123

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 124

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 044

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 049

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 004

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 083

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 087

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 089

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 091

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 093

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 094

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 095

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - P03

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - QEI1

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - P002

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 065

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - P004

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 079

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 112

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 131

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 134

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 2

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 3

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 4

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 5

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 6

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 7

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 8

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 9

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 10

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 11

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 009

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 010

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 011

SCHED4 - SCHEDULE OF SIGNIFICANT NATURAL AREAS - 011

**SCHED5 - SCHEDULE OF OUTSTANDING NATURAL LANDSCAPES Section**

**SCHED6 - SCHEDULE OF OUTSTANDING NATURAL FEATURES Section**

**SCHED7 - SCHEDULE OF HIGH COASTAL NATURAL CHARACTER Section**

**SCHED8 - SCHEDULE OF OUTSTANDING COASTAL NATURAL CHARACTER Section**

**SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Section**

**SCHED10 - PREVIOUSLY MINED LOCATIONS IN THE RURAL AND OPEN SPACE AND RECREATION ZONES Section**

**Appendices Section**

**Appendix One: Transport Performance Standards Section**

**Appendix Two: Recession Planes Section**

**Appendix Three: Design Guidelines Section**

**Appendix Four: Accidental Discovery Protocols Section**

**Appendix Five: Statutory Acknowledgements Section**

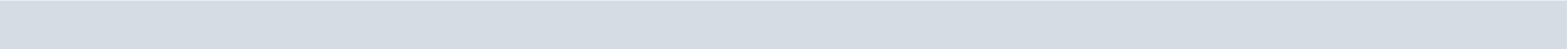
**Appendix Six: Nohoanga Entitlements Section**

**Appendix Seven: Mineral Extraction Management Plan Requirements Section**

**Appendix Eight: Community Living Precinct Concept Plans Section**

**Appendix Nine: Airport Approach Path Overlay Section**

**Appendix Ten: New Zealand Archaeological Association Sites of Māori Origin Section**



located in less hazardous locations", as in UFD - O1

areas": We support the strategic objective to situate new developments *and intensification* in less hazardous locations, *and to avoid intensification in higher hazard areas*







gnificant natural hazard

Amend Flood Severe hazard overlay to areas where flood waters in a 1% AEP flood are expected to be above 1 m, consistent with flood mapping in other NZ terretorial authorities. Include potentially liquefiable land in maps. Set rules for building on liquefiable land that are cosistent with MBIE gu

are amended to include areas of distributed and off-fault deformation, areas between fault strands and splays, and areas where the fault trace is uncertain.

Overlay, so as not to allow at least vulnerable activities such as community, health, education, critical response and hazardous facilities within the hazard overlay, and encourage the development of Westport into less hazardous areas. Building a stop bank does not mean everything behind there is hazard Overlay, so as not to allow vulnerable activities such as community, health, education, critical response and hazardous facilities within the hazard overlay, and encourage the development of Hokitika into less hazardous areas.

ies within the Flood Severe and Earthquake 20m zone, and prohibit reconstruction of buildings used for critical response, health, community, education or hazardous facilities within any natural hazard overlay. Require buildings reconstructed within the Flood Susceptibility Overlay to have the sam

an in terms of likelihood of flooding in the plan or Section 32 report. The preferred nomenclature for flood hazard is using %AEP (annual exceedence probability), and to distinguish between flood ponding areas and flood stream/overland flow paths for lower and higher flood hazard, respectively, /

iting buildings for critical response facilities are not permitted in the flood severe overlay

uld be non-complying or prohibited.

azard (fault avoidance) zones, as directed by the MfE guidelines for planning around active faults. We support at the very least simplification of the zone to include the land between adjacent strands and splays of the fault to avoid building "between faults"- ie in the middle of a complex fault zone. ,

istributed fault deformation into earthquake hazard (fault avoidance) zones, as directed by the MfE guidelines for planning around active faults.

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:al Severe Hazard Overlay, and require risk mitigation measures for buildings used for sensitive activities reconstructed within the Coastal Alert Hazard Overlay.

ould be relocated out of the coastal severe overlay, and preferably the coastal alert overlay.

across all areas of the West Coast

astal inundation level for residential properties and 300mm above the 100-year ARI coastal inundation level for commercial and industrial buildings for all structures within the Hokitika Coastal Hazard Zone.

West Coast

l inundation level for residential properties and 300mm above the 100-year ARI coastal inundation level for commercial and industrial buildings for all structures within the Westport Hazard Zone.

ion that:..." to "Manage significant risks from natural hazards by *avoiding* subdivision that:...". Additionally, define what constitutes a significant hazard.

's of control

's of control

inami Overlay for critical response facilities;" to "The subdivision will not lead to use of the land within natural hazard overlays for critical response facilities;"

posal of wastewater.  
potential land uses that could be established on the respective allotments that does not involve a directdischarge to fresh or coastal water or exacerbate/trigger land instability issues.

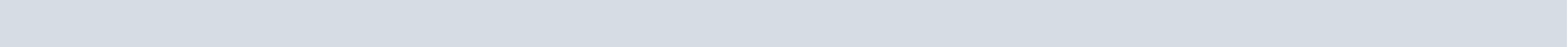


an development a little further from the current town in order to avoid natural hazards and build a more resilient community. If future urban zones are developed in areas subject to land instability we suggest the council includes in their plans provision for requiring/encouraging/ enabling- or even s.

anner either by Plan Change, or by implementation of a Structure Plan where Council resolution identifies that natural hazard risk thresholds have been met.". We would like to understand the process that will be used to identify risk levels regarding natural hazard risk, identification of levels of risk















guidance on liquefiable land.

safe from all flooding. Increasing development behind a stopbank increases risk hugely when a larger-than-design event occurs- which will happen at some point (re 2021 Ashburton flood).

ie finished floor level above the 1% AEP flood level as a new building in the same category.

As overland flow paths have greater velocity than ponding areas, which results in greater risks to life safety and property.

As a preference MfE fault guidelines should be followed.







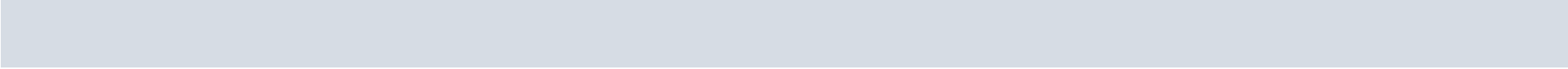
leading/implementing area- wide/global land stability mitigation measures prior to development rather than allowing an ad-hoc development of potentially unstable slopes. This has the potential to bulid a much more resilient future urban area, and will probably be more cost effective than setion-l

: tolerance/risk thresholds and whether risk tolerance levels have been met, including whether this includes an opportunity for engagement or for external agencies and individuals to submit on the plan. We seek chance to engage on this stage of the process. When developing the Structure Plan for th



























by section stabilising work. Undeveloped land presents a real opportunity to develop in a more resilient way

the FUZ, we wonder, is there an opportunity/ possibility of considering and including area-wide land stability mitigation prior to development as part of defining the infrastructure requirements for the FUZ?