

## Hearings on the TTPP

### Identification of scope submissions for the proposed changes to the framework

Submitter	Submission Point
<b>Submissions providing scope for the overarching changes to the framework – General, Objectives, Policies, Rules</b>	
West Coast Regional Council S488	<p>S488.020 Natural Hazards</p> <p><i>The Council seeks to be a party to the refinement of objectives, policies, rules and accompanying maps for Natural Hazards. That the Plan is refined to ensure there are no adverse effects on the social or economic wellbeing of West Coast people and communities, and no undue burden is placed on the West Coast Community from the proposed Plan provisions. WCRC are concerned that the general natural hazard provisions are unduly restrictive when flood hazard areas have not been refined in the flood maps.</i></p>
Buller District Council S538	<p>General Submission Point (3) –</p> <p><i>A key focus for the Council is development of a plan that is ‘user friendly’ and able to be readily interpreted by planners and the general public alike. The Council is concerned that this has not been achieved to date and the plan is not easy to understand and use and would benefit from streamlining, for example:</i></p> <ul style="list-style-type: none"> <li><i>o There are a number of confusing loops between the activity statuses of some of the rules and multiple links to other rules that can be difficult to follow.</i></li> <li><i>o Some of the rule headings are lengthy and the activities they relate to are not readily understandable.</i></li> <li><i>o Some of the rules include long lists of performance standards for both zone and precincts which is difficult to follow, for example Rule SETZ-R2. The use of tables or some other method of conveying the requirements in a concise manner is suggested.</i></li> <li><i>o Some of the rules are prescriptive and overly complex for the District environment which is predominantly rural with low levels of development, for example acoustic insulation and lighting rules.</i></li> <li><i>o The number of Zones and Precincts makes for a complicated planning process and consideration should be given to whether these are all necessary or could be merged.</i></li> </ul> <p>General Submission Point (7) –</p> <p><i>One area that Council understands will be contentious are the Natural Hazards provisions. This submission can be summed up as an attempt to allow improvements or upgrades to existing buildings and infrastructure, but restrict new development in areas that will</i></p>

	<p><i>likely increase the number of people potentially exposed to the risk/hazard. Council realises the significant impact of the various overlays to residents and in particular the current challenges facing Buller. A review of all natural hazard overlays is required and needs to be supported with evidence to justify their extent. It seems that further technical reporting is required.</i></p>
<p>Grey District Council S608</p>	<p>General</p> <p><i>Finally the submitter seeks any and all relief required to give effect to the matters raised in this submission, including as affected by introduced national environmental standards and national policy statements. Relief sought 1 specifically includes but is not limited to the relief detailed in the Bulk Submission Spreadsheet and word document attached.</i></p> <p><i>In addition, the submitter specifically seeks any other relief as may be required to give effect to the matters raised in this submission, including alternative, further or consequential amendments to any provisions of the TPPP that address the matters raised by this submission.</i></p> <p>S608.560 - In relation to NH-P2 –</p> <p><i>It is unclear as to how natural hazards are being identified, how the risk is being quantified, and what evidence is acceptable to suggest the risk is significant, leading it to be unclear as to how the policy will be applied. Relief sought: Alter the policy to provide clarity on how natural hazards are being identified, how the risk is being quantified, and what evidence is acceptable to suggest the risk is significant.</i></p>
<p>Te Mana Ora (S190)</p>	<p>S190.154 Natural Hazards Overview</p> <p><i>We agree with the objectives and policies in this section, particularly the intention to take a regionally consistent, risk-based approach to natural hazard management and to recognise and provide for the effects of climate change and its influence on the frequency and severity of natural hazards. Climate change has considerable impacts on health and wellbeing of communities, as highlighted by the Royal Society, including displacement from flooding, damage to critical infrastructure from flooding and fires, and extreme temperatures resulting in significant risks to health, especially for those who work outside. Te Mana Ora supports the identification and development of natural hazard overlays to reduce the health impacts of climate change to the population. Additionally, we support the continued natural hazard assessment of and response to natural hazard risks. Regarding reconstruction on sites subject to natural hazards, we submit that there may be a public health risk to the occupants via exposure to repeat natural hazard events. Having the options including Future Urban Zone (FUZ) alternatives should also be considered if the exposure to the natural hazard is ongoing and may continue to harm people and damage property.</i></p>
<p>Ruth Henschel S150</p>	<p>S150.001 Natural Hazards Policies</p>

	<i>Amend the Natural hazard policies and risk management approach in relation to Flood hazard susceptibility and Coastal hazard alert hazards so they are less risk averse.</i>
Richard Henschel S285	S285.004 Natural Hazards <i>Provide more scientifically robust proposals with regards to natural hazards. Take a less extreme approach to managing risk rather than this 'worst case scenario', generalised planning. We would like to see a more measured and measurable approach to the hazard planning for individual properties.</i>
Inger Perkins S462	S462.006 Overview <i>Amend overview to specifically identify increased storm intensity and frequency as issues and increased frequency of extremely windy days and the resulting hazards. Specifically state that the impact of these natural hazards will be exacerbated by climate change. Refer to and include the information from climate change projections for the west coast.</i>
Troy Scanlon S468	S468.004 Natural Hazards Rules <i>Amend provisions and overlay extents to be more enabling of building and development and recognise existing investments.</i>
Katherine Gilbert S473	S473.019 Natural Hazards <i>Amend natural hazards policies and rules so that they implement the statements in the description and reflect the seriousness of future climate disruption.</i>
Rosalie Sampson S539	S539.008 Natural Hazards Rules <i>Ensure that hazards of a similar level of risk are treated similarly within the rules.</i>
Chris & Jan Coll S558	S558.100 Permitted Activities <i>Amend to be more enabling of development.</i>
Chris J Coll Surveying Limited S566	S566.100 Permitted Activities <i>Amend to be more enabling of development.</i>
Joel and Jennifer Watkins S565	S565.038 Natural Hazards <i>Delete - there are existing controls in place in relation to the section.</i>
Department of Conservation S602	S602.037 Natural Hazards <i>Amend the policies, and matters of discretion to include the consideration of alternatives, and to require the consideration of alternatives for hard protection structures.</i>
Toka Tū Ake EQC S612	S612.118 Natural Hazards Other Relevant Provisions <i>Some areas are subject to multiple hazards Amend to add a framework for an appropriate management method for areas subject to multiple hazards includes their identification and then managing</i>

	<p><i>them by taking a multi-hazard, precautionary approach limiting future development or sensitive/ post emergency response activities within the area.</i></p> <p>S612.129 Subdivision SUB - P4</p> <p><i>Important to define the level of hazard deemed "significant" by the TTPP</i></p> <p><i>Define what constitutes a significant hazard.</i></p>
<b>Submissions in support of a risk-based approach</b>	
Te Mana Ora S190	<p>S190.155 Natural Hazards NH - O1</p> <p><i>We strongly support this objective, particularly the intention to take a regionally consistent, risk-based approach to natural hazard management.</i></p>
Bert Hofmans S504	<p>S504.002 Natural Hazards</p> <p><i>Support a risk based approach to natural hazards.</i></p>
Lindy Millar S505	<p>S505.002 Natural Hazards</p> <p><i>Support a risk based approach to natural hazards.</i></p>
<b>Submissions for clarity around provisions for unoccupied buildings, and less sensitive activities/structures in the hazard overlays</b>	
Buller District Council S538	<p>S538.110 to S538.119 Natural Hazards Rules</p> <p><i>Insert additional permitted activity rule in each buffer addressing repairs and maintenance to unoccupied buildings in each buffer (see comment in R15). Insert permitted activity rule addressing unoccupied buildings in each buffer. While considering the definition of Additions and Alterations clarify where extensions to floor areas sit.</i></p>
West Coast Regional Council S488	<p>S488.002 and S488.025 Natural Hazards NH-R38</p> <p><i>This Rule should be amended to also provide for construction, maintenance and repair of existing and future hydrology monitoring structures and Rating District protection structures.</i></p>
Federated Farmers S524	<p>S524.044 Natural Hazards</p> <p><i>There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings</i></p>
<b>Submissions to review and/or remove the overlays generally</b>	
Misato Nomura S151	<p>S151.007 Natural Hazards</p> <p><i>There are currently too many overlay layers that makes the plan harder to read. Some of the overlays are similar and it is not clear if it is necessary to have them separated.</i></p> <p><i>To combine or delete some of the overlays present.</i></p>
Gina Hogarth S304	<p>S304.003 Whole Plan</p> <p><i>Where appropriate condense and simplify the set of rules using plain language, clearly understood definitions and tables.</i></p> <p>S304.004 Natural Hazards</p>

	<i>Review the extent of any hazard overlays which do not have expert reports and evidence to validate them.</i>
Shaun and Carissa du Plessis S402	S402.002 Natural Hazards <i>Review the number and extent of natural hazard overlays ensuring all are justified and supported with a relevant technical report that has been prepared by a suitably qualified person.</i> S402.003 Natural Hazards <i>Review all natural hazard overlay extents to ensure all are supported by evidence to justify their extents.</i>
Betty Harris S405	S405.002 Natural Hazards <i>Need to ensure that natural hazard overlays are justified and supported with evidence</i> <i>Ensure all overlays are supported with a relevant technical report that has been prepared by a suitably qualified person.</i>
Gail Dickson S407	S407.005 Planning Maps and Overlays <i>Review natural hazard overlays for accuracy in alliance with the documentation you have used to create the overlays. Reduce the number of overlays.</i>
Jane Whyte & Jeff Page S467	S467.004 Natural Hazards <i>The natural hazards overlays are not clear in their geographic application and relationship with other plan provisions, and are overly restrictive.</i>
<b>Submissions to review and/or remove the Flood Overlays</b>	
Whittaker Ventures Ltd S197	S197.002 Natural Hazards <i>Remove the Flood Plain Overlay.</i>
Anne Chapman S425	S425.001 Natural Hazards <i>Review / delete the flood overlays</i>
Davis Ogilvie & Partners Ltd S465	S465.002 Natural Hazards <i>Delete the Flood Plain Overlay</i>
Rick Hayman S471	S471.001 Natural Hazards <i>Greater clarification/justification as to the extent of the flood hazard maps including an independent peer review of the work to ensure it is fit for purpose.</i>
Chris & Jan Coll S558	S558.061 Flood Severe Overlay and Flood Susceptibility Overlay <i>Amend associated objectives, policies and rules to be more enabling.</i>
William McLaughlin S567	S567.146 Flood Severe Overlay and Flood Susceptibility Overlay <i>Amend associated objectives, policies and rules to be more enabling.</i>
Toka Tū Ake EQC	S612.114 Planning Maps and Overlays Natural Hazards

S612	<i>The Flood Severe and Flood Susceptibility overlays are inconsistent with the rest of New Zealand 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 territorial authorities</i>
<b>Submissions to review and/or remove the Westport Hazard Overlay</b>	
Jared Avery S508	S508.081, S509.081, S510.081, S511.081, S512.081, S513.081, S516.017, S543.027, S558.059, S566.059, S567.144 Westport Hazard Overlay
Kyle Avery S509	<i>Amend overlay and amend associated objectives, policies and rules to be more enabling</i>
Avery Bros S520	
Bradshaw Farms S511	
Paul Avery S512	
Brett Avery S513	
Steve Croasdale S516	
Martin & Co Westport Ltd and Lumberland Building Market Westport S543	
Chris & Jan Coll S558	
Chris J Coll Surveying Limited S566	
William McLaughlin S567	
Steve Croasdale S516	S516.016 Natural Hazards <i>Amend [Westport Hazard] overlay</i>

Note: This is not intended to be an exhaustive list of relevant submissions but to provide a range of relevant examples