**From:** "Resilience" <resilience@naturalhazards.govt.nz>
**Sent:** Mon, 31 Aug 2026 09:49:12 +1200
**To:** "submissions@southwaikato.govt.nz" <submissions@southwaikato.govt.nz>
**Subject:** NHC Submission Plan Change 4
**Attachments:** NHC Submission South Waikato Plan Change 4.pdf

Kia ora,

Please find attached the Natural Hazards Commission Toka Tū Ake submission on Plan Change 4: Urban Growth. Please feel free to contact resilience@naturalhazards.govt.nz if you have any questions.

Ngā mihi,

**Livvy Harris (she/her)**
**Senior Advisor, Risk Reduction| Kaitohutohu Matua, Whakamāmā Tūraru**
Natural Hazards Commission Toka Tū Ake
[redacted] Christchurch
www.naturalhazards.govt.nz




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Natural Hazards Commission
Toka Tū Ake

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# To the Planning Team, South Waikato District Council

Name of submitter: Sarah-Jayne McCurrach

Organisation: Natural Hazards Commission Toka Tū Ake

Email: resilience@naturalhazards.govt.nz

Date: 31 August 2026

Thank you for the opportunity to submit on Plan Change 4.

## 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 (who have 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, the NHI Act requires NHC to facilitate research and education and to share information, knowledge and expertise with the Crown, public and private entities, and the public, including in relation to:

- natural hazards and their impacts
- community resilience to natural hazards
- planning for, and recovering from, natural hazards

As the 'first loss' insurer for residential damage from natural hazards listed in the NHI Act, NHC carries financial risk on behalf of the Crown and sees hazard impacts firsthand through the claims we receive. This gives NHC strong insight into, and a strong interest in, reducing risk and building resilience to natural hazards across New Zealand.

Our research and education investments help translate evidence into policy and planning that supports long-term resilience. We encourage building in areas that will remain safe and sustainable for future generations and avoiding development in high-risk hazard zones where future owners may face complex and potentially hazardous situations that compromise safety and longevity.



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Climate change is increasing the frequency and severity of natural hazards covered by the NHC Scheme. We therefore support clear, risk-based policy frameworks that enable resilient, sustainable land use planning, and support community education and resilience.

In submissions on council strategies and plans, we focus on the suitability of land proposed for development *without* mitigation. We do not submit on individual planned or proposed developments; councils decide whether risks can be managed and whether appropriate mitigation and management is in place for individual consent applications.

Our advice is not intended to impede development; it is to highlight the need for careful, precautionary choices that support resilient, sustainable communities. We aim to help councils ask the right questions and make risk-informed decisions.

Accordingly, we encourage councils to consider the future risks and impacts a district plan may create, and to be satisfied that:

- Natural hazard risk is assessed on a multi-hazard basis, across multiple timeframes, out to at least 50 (preferably 100) years, using multiple climate change scenarios.
- Risks are mitigated to levels the community and council consider tolerable (for example, whether ongoing 'nuisance flooding' is acceptable).
- New development does not create new or increased risks for neighbouring suburbs, now or in the future.
- There is a plan to manage any residual risks after mitigation.
- The 'status quo' of risk and risk tolerance is appropriate for long-term decisions (for example, existing flood-, liquefaction- or tsunami-prone communities are not justification for new development to face the same risks).

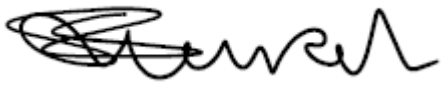
Where there is any doubt, we encourage councils to engage with private insurers to understand their tolerance for insuring locations, risks and developments. Insurability should be a key consideration when assessing the risks and impacts on future communities.

South Waikato District is exposed to natural hazards, including flooding, liquefaction, and ground shaking caused by earthquakes. Climate change is likely to affect the frequency and intensity of flooding across the district, which reinforces the need for natural hazard risk to be managed effectively through the district plan.

NHC encourages territorial authorities to use risk-based frameworks in district plans to reduce risk and increase resilience to natural hazards. Plan Change 4 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



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Natural Hazards Commission
Toka Tū Ake



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

**Natural Hazards Commission Toka Tū Ake Submission on Plan Change 4**

**To:** South Waikato District Council
Via Council submission email:
submissions@southwaikato.govt.nz

**Submitter:** Natural Hazards Commission Toka Tū Ake (NHC)

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**1. This is a submission on the following:**

The Plan Change 4 notified on 22/07/2026.

**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 attached Appendices comprise the NHC submission. This submission relates to Plan Change 4 in its entirety.**

**5. The submission from NHC is:**

NHC supports, is neutral, and opposes Plan Change 4 to the extent outlined in this submission.

a) **Flood risk management provisions** – NHC supports provisions that manage flood risk through, minimum floor levels, setbacks from rivers, and controls on earthworks and buildings in high-risk flood areas.

b) **Liquefaction and risk assessment** – NHC supports requiring assessment by a suitably qualified geo-professional on land potentially prone to liquefaction and seeks clearer definitions or metrics for terms such as ‘acceptable level’ and ‘adequate assessment’.

c) **Subdivision and development** – NHC supports provisions that require subdivision and development to take account of natural hazards, and seeks clearer direction on how natural hazard risk should be assessed and managed.

d) **Significant natural hazard risk** – NHC seeks a clearer definition or risk matrix for ‘significant natural hazard risk’ to support consistent interpretation and alignment with national direction on natural hazards.

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 Plan Change 4, including such further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.





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Natural Hazards Commission
Toka Tū Ake

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|---|---|
| Date: | 31/08/2026 |
| Address for service: | Natural Hazards Commission Toka Tū Ake<br>PO Box 790,<br>Wellington<br>6140 |
| Contact person: | Sarah-Jayne McCurrach, Head of Risk Reduction |
| Email: | resilience@naturalhazards.govt.nz |

## Appendix One

| Provision | Description | Support / Oppose / Amend | Reasoning | Requested Action |
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| **Interpretation Chapter** | | | | |
| Habitable Room | Means any room used for the purposes of teaching or used as a living room, dining room, sitting room, bedroom, office or other room specified in the Plan to be a similarly occupied room. | **Support** | NHC supports the definition of 'habitable room' because it provides clarity for the application of rules and policies that manage natural hazard risk, such as floor levels and setbacks. | Retain the provision. |
| High-risk flood zone | Land that is subject to river or surface flooding during an event with an annual exceedance probability of no more than one per cent, and during such an event:<br>i. the depth of flood waters exceeds one metre;<br>ii. the speed of flood waters exceeds two metres / second; or<br>iii. the flood depth multiplied by the flood speed exceeds one. | **Support with amendments** | NHC supports the inclusion of a defined 'high-risk flood zone'. Clearly identifying thresholds for flood depth and velocity supports consistent decision-making and helps reduce exposure of people and property to flood hazards.<br>We recommend clarifying the wording of the definition to avoid misinterpretation. As drafted, 'no more than one percent' is confusing and could be subject to misinterpretation. For example, it could be interpreted as referring either to the annual exceedance probability (AEP) itself (i.e. no more than one per cent AEP) or to the flood depth associated with a one | The following amendment is made:<br>Land that is subject to river or surface flooding during an event with an annual exceedance probability of ~~no more than~~ one per cent or a less frequent event, and during such an event:<br>i. the depth of flood waters exceeds one metre;<br>ii. the speed of flood waters exceeds two metres / second; or |

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| | | | percent AEP event (i.e. no more than 1m flood depth). A clear definition supports improves clarity and can support consistent decision to reduce risk. | iii. the flood depth multiplied by the flood speed exceeds one. |
| **Natural Hazards Chapter** | | | | |
| NH-P4 | Manage flooding risk to people and property by requiring compliance with minimum floor levels and setbacks. Where compliance cannot be achieved, other risk reduction options must be assessed and implemented. | **Support** | NHC supports managing flood risk through minimum floor levels and setbacks. Raising floor levels and implementing setbacks from rivers can help reduce the likelihood of buildings being affected by flooding or river-related hazards. These are practical risk reduction tools that can reduce impacts on people and property. NHC also supports requiring alternative risk reduction options to be assessed and implemented where compliance with minimum floor levels and setbacks cannot be achieved. | Retain the provision. |
| NH-P5 | On land that is potentially prone to liquefaction, before new subdivision or development occurs, require an assessment by a geo-professional that reflects the type and scale of the activity, its overall vulnerability to the effects of liquefaction and the appropriate mitigation | **Support with amendments** | NHC supports requiring a suitably qualified geo-professional to assess land that is potentially prone to liquefaction before new subdivision or development occurs. This supports evidence-based decision-making and helps ensure mitigation measures are appropriate to the type and scale of the activity. However, we recommend providing alternative options where | Provide alternate options for a suitably qualified geo-professional.<br>Provide a definition and/or metric that clarifies what is meant by 'acceptable level' of liquefaction risk. |

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| | measures needed to reduce risk to an acceptable level. | | a suitably qualified geo-professional may not be available.<br><br>We recommend providing a definition and/or metric for the term 'acceptable level'. Without a clear threshold, there may be uncertainty about the level of mitigation required, which could lead to inconsistent decision-making. NHC has developed a Risk Tolerance Methodology[1] that could be used to determine acceptable levels of risk.<br><br>[1]Natural Hazards Commission (2025). Risk Tolerance Methodology. | |
| NH-R1 | PER Activities<br><br>GRZ, COMZ and MU-SETZ<br><br>(1) Outside of a high-risk flood zone, the floor level of any building with a habitable room shall be at least 0.5m above the 1% design flood level.<br><br>(2) All buildings shall be set back at least 25m from the edge of any river.<br><br>Activities that cannot comply with NH-R1 are discretionary activities. | **Support** | NHC supports requiring buildings with habitable rooms to be located at least 0.5 metres above the one percent design flood level and requiring buildings to be set back from rivers. These requirements are practical ways to reduce exposure to flood hazards and reduce impacts on people and property during flood events. | Retain the provision. |
| NH-R2 | PER Activities | **Support** | NHC supports requiring buildings with habitable rooms to be located at least 0.5 | Retain the provision. |

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| | GRUZ, RLZ, TCZ, NCZ, FUZ and the District Growth Cells<br><br>(1) Outside of a high-risk flood zone, the floor level of any building with a habitable room shall be at least 0.5 metres above the 1% design flood level.<br><br>(2) All buildings shall be set back at least 25 metres from the edge of any river, except for necessary utility structures such as pump sheds and water intake structures.<br><br>Activities that cannot comply with NH-R2 are discretionary activities. | | metres above the one percent design flood level and requiring buildings to be set back from rivers. These requirements are practical ways to reduce exposure to flood hazards and reduce impacts on people and property during flood events. | |
| NH-R4 | DIS Activities<br><br>All zones<br><br>(1) Any earthworks undertaken fully or partially within a high-risk flood zone.<br><br>(2) Any building located fully or partially within a high-risk flood zone provided it does not contain a habitable room.<br><br>Activities that cannot comply with NH-R4(2) are non-complying activities. | **Support** | NHC supports earthworks within a high-risk flood zone being managed as a discretionary activity. Earthworks can alter flood storage, flood flow paths, flood depths, and may create or increase flood risk if they are not properly assessed and managed. Having earthworks as a discretionary activity can help to reduce the impacts on people and property.<br><br>NHC also supports restricting buildings with habitable rooms within high-risk flood zones. Limiting habitable rooms in these areas is an important way to reduce exposure of people and property to flood hazards. | Retain the provision. |

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| **Subdivision Chapter** | | | | |
| 11-SUB | The provisions require that subdivision is well-planned and integrated with existing land uses and infrastructure provision. This includes taking into account natural hazards such as flooding and land stability. In the District Growth Cells and as the future urban zones are developed, there is an expectation that subdivision and subsequent development are co-ordinated with infrastructure provision and have good connectivity to surrounding neighbourhoods so that they positively contribute to surrounding neighbourhoods. | **Support** | NHC supports the subdivision chapter recognising the need for subdivision to take account of natural hazards such as flooding and land stability. Subdivision decisions are long-term land use decisions and can create future exposure to natural hazard risk. It is therefore important that natural hazards are considered early and clearly in the subdivision process. | Retain the provision. |
| SUB-O7 | Prior to the establishment of new subdivision and development, ensure adequate assessment of the natural hazard risk is undertaken. | **Support with amendments** | NHC supports requiring an adequate assessment of natural hazard risk before new subdivision and development occurs. This is important because subdivision and development decisions can increase the number of people and properties exposed to natural hazards and can influence the ability to reduce risk over the long-term.<br><br>NHC recommends that clearer guidance on what constitutes an 'adequate assessment' is provided. This would improve clarity and help ensure natural hazard risk is assessed | The following amendment is made:<br><br>Prior to the establishment of new subdivision and development, ensure adequate assessment of the natural hazard risk is undertaken. A natural hazard risk assessment must take into account the following:<br><br>1. the type, frequency and scale of the natural hazard (including |

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| | | | consistently. Waitaki District Council Proposed District Plan[1] provides detailed provisions that could be adapted to outline the requirements for a risk assessment.<br><br>[1]Waitaki District Council. Proposed District Plan: Natural Hazards Chapter. | compounding, cumulative, and cascading hazards) and whether the effects will likely be temporary or permanent; and<br><br>2. the type of activity being undertaken and its vulnerability to natural hazard events; and<br><br>3. the consequence of a natural hazard event in relation to the proposed activity; and<br><br>4. the suitability of any proposed new allotment and intended future use; and<br><br>5. the potential effects, including positive effects on public health and safety and other property; and<br><br>6. the potential effects, including positive effects on social, cultural and economic well-being; and<br><br>7. any exacerbation of an existing natural hazard risk; and<br><br>8. any risk reduction or hazard mitigation measures proposed, including relocation and recovery; and |

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| | | | | 9. any opportunities to take an adaptive management approach to addressing the risk. |
| SUB-P2 | Minimise risks to the health and safety of people by controlling the location and design of subdivision in areas subject to contaminated land and natural hazards, and by<br><br>(a) Ensuring subdivision and the resulting development does not create new or exacerbate existing natural hazards; and<br><br>(b) Avoiding subdivision that does not provide safe, flood free, stable building platforms at the time of subdivision. | **Support with amendments** | NHC supports controlling the location and design of subdivision in areas subject to natural hazards. This helps manage risks to people and property and can reduce the likelihood that subdivision decisions create or worsen natural hazard risk.<br><br>NHC recommends replacing 'natural hazards' with 'natural hazard risk' in clause (a), as risk better reflects the combination of likelihood and consequence and is consistent with risk-based planning approaches. Clause (a) should also be updated to reflect that natural hazard risks should not be created or exacerbated on neighbouring properties or downstream areas.<br><br>NHC further recommends removing "at the time of subdivision" from clause (b). Development enabled by subdivision should remain safe and suitable over the long-term, including under future climate conditions that may increase the frequency and intensity of rainfall and flooding events (not just at the time of subdivision). | The following amendments are made:<br><br>(a) Ensuring subdivision and the resulting development does not create new or exacerbate existing natural hazard~~s~~ risk on the site, on neighbouring properties, or in downstream areas; and<br><br>(b) Avoiding subdivision that does not provide safe, flood free, stable building platforms ~~at the time of subdivision~~. |

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| R5(4)-RLZ | (c) Development Concept Plan<br>• Natural hazards or physical constraints including means to mitigate such constraints and manage significant risks from natural hazards as part of the overall development of the growth cell – See APP4 | **Support with amendments** | NHC supports requiring development concept plans to identify natural hazards and manage significant risks from natural hazards. This provides an opportunity for natural hazard risk to be considered early in the planning process. This can help avoid or reduce exposure to natural hazards and identify mitigation or residual risk management requirements before development occurs.<br><br>NHC recommends that a definition is included for what level of natural hazard risk is considered 'significant'. Without a definition the term is open to interpretation and could cause confusion. Any definition for 'significant' risk should be at least consistent with the current National Policy Statement for Natural Hazards (NPS-NH)[1] and the accompanying Implementation Guide[2].<br><br>[1]Ministry for Cities, Environment, Regions, and Transport (2025). NPS-NH.<br><br>[2]Ministry for Cities, Environment, Regions, and Transport (2026). NPS-NH: Implementation Guide. | Include a risk matrix and a definition of "significant natural hazard risk", and that this definition is aligned with the language in the NPS-NH. |
| **Earthworks Chapter** | | | | |

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| EW-P6 | Avoid, remedy or mitigate earthworks where their scale and location has the potential to create or exacerbate natural hazards. | **Support** | NHC supports avoiding, remedying, or mitigating earthworks where their scale and location have the potential to create or exacerbate natural hazards. Earthworks can change land stability, overland flow paths, and drainage patterns. If not appropriately assessed and managed, earthworks can increase natural hazard risk to people and property. | Retain the provision. |